

URBAN COUNTY OF SANTA CLARA HOME-ARP Allocation Plan

Public Comment Period: May 30, 2023 – June 14, 2023



Prepared by the Office of Supportive Housing

Housing and Community Development Division 130 W. Tasman Drive, San Jose, CA

Submitted to HUD, June 27, 2023

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Executive Summary

The American Rescue Plan Act of 2021 (ARP) authorized \$5 billion in funding provided by the U.S. Congress to be distributed through the HOME Investment Partnerships Program (HOME) in order to address the need for homelessness assistance and supportive services. Program activities must primarily assist qualifying individuals and families who are homeless, at-risk of homelessness, or belong to other vulnerable populations. According to the guidelines set forth by the U.S. Department of Housing and Urban Development (HUD) for HOME-ARP, the County of Santa Clara's (County) HOME-ARP Allocation Plan (Allocation Plan) outlines how the County will use funds from the HOME-ARP Program for eligible activities to address the unmet needs of the qualifying populations (QPs). According to the guidelines set forth by the U.S. Department of HOUD) for HOME-ARP, the County of Santa Clara's (County) HOME-ARP Program for eligible activities to address the unmet needs of the qualifying populations (QPs). According to the guidelines set forth by the U.S. Department of HOUD) for HOME-ARP, the County of Santa Clara's (County) HOME-ARP Program for eligible activities to address the unmet needs of the qualifying populations (QPs). According to the guidelines set forth by the U.S. Department of HOUSING and Urban Development (HUD) for HOME-ARP, the County of Santa Clara's (County) HOME-ARP Allocation Plan outlines how the County will use funds from the HOME-ARP Program for eligible activities to address the unmet needs of the qualifying populations (QPs).

The County as the HOME Consortium lead will receive a one-time allocation of HOME-ARP funding in the amount of \$3,599,966 from HUD. To receive the HOME-ARP allocation, the County must develop an Allocation Plan that will become part of the Fiscal Year 2021–2022 Action Plan (FY21–22 Action Plan). The Allocation Plan includes a summary of the County's consultation activities, estimates of the size and demographic composition of the QPs, and the intended uses of the County's HOME-ARP funding for eligible activities. ARP defines qualifying individuals or families as those that are (1) homeless, as defined in Section 103 of the McKinney-Vento Homeless Assistance Act; (2) at-risk of homelessness, as defined in Section 401 of McKinney-Vento; (3) fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or (4) in other populations where providing supportive services or assistance would prevent a family's homelessness or would serve those with the greatest risk of housing instability.

Continuums of Care (CoCs), homeless service providers, domestic violence service providers, veterans service groups, public housing authorities, nonprofit organizations that address the needs of the QPs, and public and private organizations that address fair housing, civil rights, and the needs of people with disabilities all participated in the County's extensive consultation process between July 2021 and March 2022. The consultation's purpose was to collect qualitative data in order to determine the most pressing needs and service gaps for people living in QPs across the County.

Across all forums, participants consistently reported that the largest gaps in their communities were in supportive services. Without supportive services, it is difficult for individuals with health, economic, and other challenges to maintain stable housing.

The County plans to fill supportive service gaps with 85% of its HOME-ARP allocation and use the remaining 15% for HOME-ARP administration and planning. To fulfill this need, the County will include this service in an upcoming Request for Qualifications for Supportive Services if there is a lack of capacity among current providers. While there are insufficient resources in our community to meet the need, the HOME-ARP funds will address the current service gap and offer necessary supportive services across the four qualifying populations residing throughout the Urban County limits.

Consultation Process

Describe the consultation process including methods used and dates of consultation:

HUD requires each Participating Jurisdiction to consult with agencies and service providers whose clientele includes 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 or 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 County may undertake.

The County of Santa Clara's Office of Supportive Housing started its engagement process in 2021 as part of the County's gap analysis for unhoused families with children. This effort included multiple consultation sessions with stakeholders from each of the recommended entities and a regular evaluation of the gaps in serving homeless families. This engagement process has been extended over a period of time when a number of new resources have entered our community and there was a desire to allow for a more intentional review of the system gaps. In addition, the County held two different public hearings to give the Board of Supervisors and the public multiple opportunities for input.

Below is a summary table of our HOME-ARP feedback collection opportunities:

Method of Gathering Input	Date and Time
Focus Group – Social Services Agency	July 7, 2021
Virtual Listening Sessions with the Required Service	October 26, 2021
Providers	November 1, 2021
	November 10, 2021
	January 5, 2022
Virtual Listening Session – Local Government	January 12, 2022
Focus Group – Community Solutions	March 17, 2022
Continuum of Care Board Meeting	March 28, 2022
Public Comment	May 30 – June 14, 2023
Public Hearings	January 25, 2022 and March 14, 2023

Table 1: Feedback Collection Opportunities

List the organizations consulted.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Destination: Home	Service – All qualifying populations	Virtual Meeting – July 30, 2021	Supports looking at different ways to leverage the resources to make a real impact.
Santa Clara County Continuum of Care Board	Service – Homelessness (Continuum of Care)	Virtual Meetings – March 28, 2021 July 7, 2021 September 9, 2021	Supports targeting the resources towards supportive services for families enrolled in Heading Home. Provided regular updates on the gaps in the system and continue to support the County's recommendation for HOME-ARP. Note: CoC staff provided the internal OSH team working on the Allocation Plan with data related to homeless families and survivors of gender-based violence.
Santa Clara County Office of Immigrant Relations (OIR)	Public Agency	Virtual Meeting – August 4, 2021	Consider connecting families to additional services provided through OIR. There is an identified gap among families who are undocumented
NextDoor Solutions	Service - Domestic Violence, Human Trafficking, and Gender-Based Violence	Virtual Meeting – October 26, 2021	Discussed a variety of options related to housing opportunities and referral processes.
Community Solutions	Service - Domestic Violence, Human Trafficking, and Gender-Based Violence	Virtual Meeting – October 26, 2021	Requested help navigating the housing system more effectively and pushed for a new housing intervention for domestic violence survivors.
Asian Americans for Community Involvement (AACI)	Service - Domestic Violence, Human Trafficking, and Gender-Based Violence	Virtual Meeting – October 26, 2021	Development, operations, and supportive services are priority needs.
Santa Clara County Office of Gender-Based	Public Agency – Domestic Violence, Human Trafficking,	Virtual Meeting – October 26, 2021	Generally asked for assistance in better navigating the housing system and advocated for a new housing intervention for survivors

Table 2: Consulted Organizations

Violonao	and Candan Dagad		that allows for a thread year
Violence Prevention	and Gender-Based Violence		that allows for a three-year transition period. Discussed a variety of options related to housing opportunities and referral processes.
Santa Clara County Housing Authority	Public Agency	Virtual Meetings – October 26, 2021, November 1, 2021	Supported the County's proposal and offered support in engaging with landlords and services partners. Discussed various ways to engage landlords in supporting families with an EHV or HCV.
Saint Joseph's Family Center	Service – Homeless and at-risk.	Virtual Meetings – November 1, 2021, & November 10, 2021	Mentioned that families need more time to find an apartment.
YWCA Golden Gate Silicon Valley	Service – People Fleeing Domestic Violence and human trafficking	Virtual Meetings – October 26, 2021, November 1, 2021, & November 10, 2021	Generally asked for assistance in better navigating the housing system and advocated for a new housing intervention for survivors that allows for a three-year transition period. Supported the County's proposal but asked for assistance in acquiring apartments that can be used solely for survivors of gender-based violence.
Amigos De Guadalupe Center for Justice and Empowerment	Service – Homelessness, at- risk,, and other populations	Virtual Meetings – November 1, 2021, & November 10, 2021	Supported the County's proposal and describe the additional hardship that families face when being unsheltered and/or living in their vehicles.
Abode Services	Service – Homeless, at-risk, and veterans	Virtual Meeting November 1, 2021, & November 10, 2021	Supported the County's proposal and encouraged engagement with local landlords.
HomeFirst Services of Santa Clara County	Service – Serves all qualifying populations	Virtual Meeting – November 1, 2021, & November 10, 2021	Provided testimony around the struggles faced by families and the limited number of resources available for families with school- aged children.

LifeMoves	Service – Serves all qualifying populations	Virtual Meeting – November 1, 2021, & November 10, 2021	Shared information about upcoming programs and the City of San Jose's motel voucher program for families.
Community Solutions	Service – Homeless, at-risk, veterans, and survivors	Virtual Meeting – November 1, 2021, & November 10, 2021	Shared that more families need intensive case management than before.
Community Solutions 1:1	Service – Homeless, at-risk, veterans, and survivors	Virtual Meeting – March 17, 2022	Asked about the opportunity to acquire a single-family home for survivors.
City of Campbell	Public Agency	Virtual Meeting – January 12, 2022	Supports funds for case management, supportive services to prevent evictions and housing for families and at-risk households.
City of Cupertino	Public Agency	Virtual Meeting – January 12, 2022	Mentioned that landlords are unwilling to rent to voucher holders.
City of Gilroy	Public Agency	Virtual Meeting – January 12, 2022	Shared how all four of the HOME-ARP QPs struggle to find housing that is affordable and accessible in the community.
Town of Los Gatos	Public Agency	Virtual Meeting – January 12, 2022	Shared the issues that low-income households experience due to the lack of affordable units.
City of Morgan Hill	Public Agency	Virtual Meeting – January 12, 2022	Shared the problems that the community is having as a result of rising costs for housing. The end of the eviction moratorium has made housing more expensive and uncertain for low-income households.
City of Mountain View	Public Agency	Virtual Meeting – January 12, 2022	Asked the County for a list of CoC providers and partnering agencies contact list.
City of Palo Alto	Public Agency	Virtual Meeting – January 12, 2022	Supports the funding of supportive services, and affordable housing for families, and low-income households. Expressed a desire to increase shelter access and intake.

City of Santa Clara	Public Agency	Virtual Meeting – January 12, 2022	Supported using the funding for supportive services with a priority on families.
City of Saratoga	Public Agency	Virtual Meeting – January 12, 2022	Discussed the problems that the low-income community faces as a result of the shortage of affordable housing.
City of Sunnyvale	Public Agency	Virtual Meeting – January 12, 2022	Reiterated that there is a service gap present and supported the County's proposal that there is a need out there for emergency housing vouchers.
City of San Jose	Public Agency	Virtual Meeting – January 12, 2022	Requested guidance on the required community and regional partner consultation meetings for the HOME-ARP funding. Also requested to share the COC contact list.
Santa Clara County Social Services Agency	Public Agency	Virtual Meeting – July 7, 2021	Asked about ways to integrate households who are also enrolled in the County's CalWORKs programs.
Bill Wilson Center	Service – Homeless, at-risk, and other populations	Virtual Meeting – January 5, 2022	Encourage the funding of assistance programs. Expressed a desire for innovative approaches to improving the construction of affordable housing.
Catholic Charities of Santa Clara County	Service – Fair Housing and People Fleeing Domestic Violence and Dating Violence, homeless, and at-risk	Virtual Meeting – January 5, 2022	Supports the funding housing vouchers. Preference for serving families and individuals at-risk, retired individuals, and persons with disabilities.
Downtown Streets Team	Service – Homeless	Virtual Meeting – January 5, 2022	Supports funding for supportive services focused on chronically homeless individuals. Mentioned that they want to see an initiative that rewards agencies for operating collaboratively.
Family Supportive Housing	Service – Homeless and at-risk	Virtual Meeting – January 5, 2022	Supports the funding housing vouchers.

Silicon Valley Independent Living Center	Service - Other populations at greatest risk of homelessness or housing instability and civil rights, fair housing, and disability service provider	Virtual Meeting – January 5, 2022	Supports funding for supportive services focused on people with disabilities to secure integrated, affordable, and accessible housing.
Senior Adults Legal Assistance	Service - Other populations at greatest risk of homelessness or housing instability and civil rights, fair housing, and disability service provider	Virtual Meeting – January 5, 2022	Supports funding for supportive services focused on people with disabilities and persons 62 years of age and older to secure integrated, affordable, and accessible housing. Service providers also stated the increased need for the older population to have access to legal information and services regarding rights, benefits, safety, housing, and/or other legal matters.
Housing Choices	Service – Persons with disabilities	Virtual Meeting - January 5, 2022	Supports funding affordable housing because waiting lists are too long and supportive services focused on fair housing, emergency rental assistance, mental health, outreach, and live- in aids for individuals with intellectual and developmental disabilities, seniors, families, and low-income individuals. Desire for interagency collaboration.
Rebuilding Together Silicon Valley	Service – Persons with disabilities and at-risk of homelessness	Virtual Meeting – January 5, 2022	Supports funding for affordable housing for families and low- income households, and supportive services.

Summarize feedback received and results of upfront consultation with these entities: Consultation revealed strong support for the following (in order or priority):

Provision of Supportive Services.

There was strong support for supportive services. Many stakeholders have a preference about the type of services they would like funded, including homelessness prevention, financial assistance, financial literacy, basic income, rent arrears, tenant's rights, fair housing, childcare, food insecurity, storage, transportation, employment training for individuals with lived experience,

behavioral health, and case management. Stakeholders expressed a preference to serve all the qualifying populations, with a particular emphasis on unhoused families.

Development and Support of Affordable Housing.

The development and support of affordable housing is a priority for the County, and a number of stakeholders reaffirmed this priority. Stakeholders emphasized the importance of developing affordable housing for very low- and extremely low-income households and families. Some stakeholders stressed the importance of finding creative ways to build affordable housing.

Tenant-Based Rental Assistance (TBRA).

Stakeholders also supported funding TBRA and supplementing it with supportive services to help stabilize clients, however, the support was minimal when compared to other support for other eligible activities.

Public Participation

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

- Date(s) of public notice: 5/29/2023
- Public comment period: start date 5/30/2023 end date 6/14/2023
- Date(s) of public hearing: 3/14/2023 and 01/25/2022

Describe the public participation process:

In compliance with the requirements for developing the Allocation Plan, the County provided reasonable notice and the opportunity to comment on the proposed Allocation Plan for no less than fifteen calendar days and held two public hearings during the development of the HOME-ARP allocation plan, prior to plan submission.

Public noticing was done for the release of the draft Allocation Plan, public comment period, and public hearings. The public comment period and hearings were held on the dates listed below:

- The Allocation Plan was made available for public comment on May 30, 2023, for a 15day public comment period. Public comment was held from May 30, 2023, to June 14, 2023. The Plan was also made available electronically on the County's website (https://osh.sccgov.org/).
- The County's Board of Supervisors held a public hearing on the Allocation Plan on January 23, 2022.
- The County's Board of Supervisors held a public hearing on the Allocation Plan on March 14, 2023.
- Additionally, public comments could be submitted in writing to:

Santa Clara County

Office of Supportive Housing Housing and Community Development Division 130 W. Tasman Drive San Jose, CA 95134

Describe the efforts to broaden public participation:

As described in the "Consultation Process" section above, the County extensively promoted participation opportunities through listening sessions and focus groups, our website, public noticing, and direct correspondence. The County's outreach was consistent with its Citizen Participation Plan, with notices published in different languages and accommodation offered for persons with disabilities. Seven public notices were published in three different multilingual newspapers, including the San Jose Mercury News (English), El Observador (Spanish), and Vietnam Daily (Vietnamese), three of which were to inform the public that the revised Draft HOME-ARP Allocation Plan had been recirculated for public comments.

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

January 23, 2022 – Public Hearing

The Board of Supervisors heard this item at its virtual and in-person meeting on January 23, 2022.

Two comments were received from the public. The first participant expressed appreciation for the efforts made by the jurisdiction to provide very low-income housing and thanked the County for its work. The second individual stated that although market rate housing goals have been achieved since 2016, they have not been achieved for extremely low- and very low-income housing. The speaker suggested that efforts for market-rate housing should be put on hold until affordable housing goals are met. At its meeting, the Board unanimously approved the delegation of authority to the County Executive, or designee, to negotiate, execute, amend, and/or terminate the Agreement with the Department of Housing and Urban Development, in an amount not to exceed \$3,599,966, relating to HOME American Rescue Plan funds.

May 30, 2023, to June 14, 2023 – Public Comment Period

The County received no public comments.

March 14, 2023 – Public Hearing

The Board of Supervisors heard this item at its virtual and in-person meeting on March 14, 2023. No comments were received from the public. At its meeting, the Board unanimously approved the delegation of authority to the County Executive, or designee, to negotiate, execute, amend, or terminate an agreement with the Department of Housing and Urban Development relating to HOME American Rescue Plan funds in an amount not to exceed \$3,599,966.

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

No comments were received during the public participation process

Needs Assessment and Gaps Analysis

Unlike the traditional HOME funding requirements, HOME-ARP funds are intended to serve a specific targeted population known as Qualifying Populations¹. The CPD Notice 21-10 provides in-depth definitions of these qualifying populations, along with subpopulations for each definition. The definitions below, however, are condensed definitions that refer to the regulations for each qualifying population in order to make the document more readable. Qualifying populations are described as follows in the Notice:

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act;
- At risk of homelessness, as defined in section 401 of the McKinney-Vento Homeless Assistance Act;
- 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
- 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:
 - Prevent a family's homelessness;
 - Serve those with the greatest risk of housing instability

Since these are the only populations we may serve with the funding, the County will only evaluate data regarding the housing gaps for this data population.

The Office of Supportive Housing is the lead in managing the County's HOME program and is the collaborative applicant for the Santa Clara County Continuum of Care. This unique position gives the Office of Supportive Housing a greater sense of the needs of the qualifying populations across the county.

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

Homeless as defined in 24 CFR 91.5

There were 10,028 persons experiencing homelessness in the County during the 2022 Point-In-Time (PIT) Homeless Census on February 23 and 24, 2022. This represents a 3% increase from 2019. The percentage of persons living on the streets decreased slightly from 2019, while the percentage of persons staying in shelters increased by 30%. This increase in persons staying in shelters is likely due to increased Covid funding allocated to shelters and increased community efforts toward increasing shelter capacity.

In order to gain a more comprehensive understanding of the experiences of individuals and families experiencing homelessness in Santa Clara County, respondents in the 2022 PIT Homeless Census were asked basic demographic questions including age, gender, sexual orientation, and race/ethnicity.

¹ Notice CPD-21-10: Requirements for the Use of Funds in the HOME-ARP Program - HUD Exchange

Forty percent of survey respondents were over the age of 50 and 12% were under the age of 25, as shown in Table 3 below.

AGE GROUP	2017	2019	2022
Less than 18 Years	<1%	1%	<1%
18-24 Years	7%	15%	11%
25-30 Years	7%	6%	10%
31-40 Years	16%	16%	19%
41-50 Years	27%	22%	20%
51-60 Years	34%	28%	24%
61 Years or More	9%	12%	16%

Table 3: 2022 Point-In-Time Homeless Census, Respondents By Age

Nearly two thirds (61%) of survey respondents identified as male, while 37% of respondents identified as female. Transgender and gender non-conforming respondents were 1% and less than 1%, respectively. This information is shown in Tables 4 and 5 below.

Table 4: 2022 Point-In-Time Homeless Census, Respondents By Gender

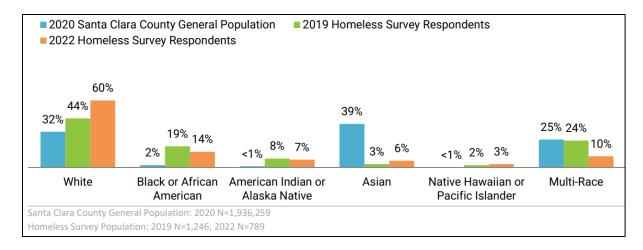
		Male	Female	Transgender	Gender Non-Conforming	
2022	61%			37%	1%	
2022 N=1	10,028					

LGBTQ+ IDENTITY	2019	2022
Gay	17%	25%
Lesbian	19%	21%
Bisexual	48%	34%
Transgender	13%	1%
Queer	3%	7%
Other	14%	13%

2019 N=175 respondents offering 198 responses; 2022 N=134 respondents offering 147 responses Note: Multiple response question. Percentages may not add up to 100.

In profiling racial identity, differences between the general population and those experiencing homelessness were more pronounced, as shown in Tables 6 and 7 below. A much higher proportion of homeless survey respondents identified as Hispanic/Latinx than in the general population of Santa Clara County (47% compared to 25%). Survey respondents identifying as Black or African American continued to be overrepresented when compared to the general population, with 14% identified in 2022 compared to 2% of the general population. Please see Table 6 below for more information.

Table 6: 2022 Point-In-Time Homeless Census, Respondents by Race



At Risk of Homelessness as defined in 24 CFR 91.5

The County prioritizes extremely low-income households who are at-risk of homelessness. The Homelessness Prevention System provides assistance to low-income families or individuals who are at-risk of losing their housing, including temporary financial assistance, legal support, case management, and other services. Since 2017, the region's Homelessness Prevention System has assisted over 5,000 households from beginning homeless. The system has seen that in Santa Clara County:

- 60% of those assisted included children under the age of 18
- 35% of the heads of households had a disabling condition
- 89% of those assisted were extremely low-income with 51% seeking assistance due to income loss or reduction and 5% were fleeing domestic violence.

According to the California Housing Partnership's 2021 Affordable Housing Needs Report, 74% of Extremely Low-Income families in Santa Clara County are paying more than half of their income on housing costs compared to just 1% of moderate-income households². Renters in Santa Clara County need to earn \$46.21 per hour to afford the average monthly asking rent of \$2,403.

The most severe impacts of COVID-19 have been felt by the most vulnerable members of our community. Most renters with increasing debt and who are most at-risk of evictions are low-wage employees and disproportionately are people of color. On September 16, 2021, Policy Link³ indicated that two-thirds of renters with rental arrears are people of color as renters of color have been disproportionately impacted by the pandemic and are most vulnerable to eviction. Further, households unable to pay rent have remained at 14-15 percent, which is twice the baseline pre-pandemic.

Data from the Homeless Prevention System shows an uptick in the need for prevention services in the County and indicate an increased number of households that are at-risk of homelessness. The most recent full year of data (CY2021) shows that 1,063 households – comprising 2,483 household members households received prevention services. Due to the interventions provided for in the

² Santa-Clara_Housing_Report.pdf (chpc.wpenginepowered.com)

³ Policy Link: Rent Debt in America: Stabilizing Renters is Key to Equitable Recovery, <u>Rent Debt in America: Stabilizing</u> <u>Renters Is Key to Equitable Recovery | Policy Link</u>

Homeless Prevention System, 98.3% of those households (1,284) were able to retain their housing while receiving services. In the first reporting quarter of FY 2022-2023, data shows an even larger uptick in at-risk households with 305 receiving services in the first three months of the year.

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

As of August 4, 2022, there were 914 households on the Community Queue who reported that they were currently fleeing domestic violence (DV) or have been a DV victim/survivor within the past year. 58% of those on the Community Queue self-identified as currently fleeing domestic violence. 63% of homeless clients identified as female. As shown in Table 7 below, the 35-44 age tier had the most victims/survivors.

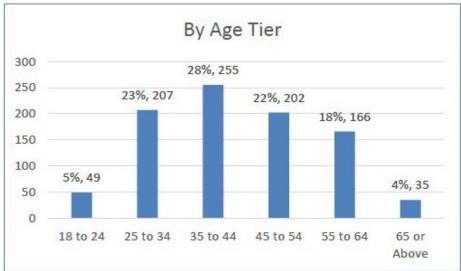
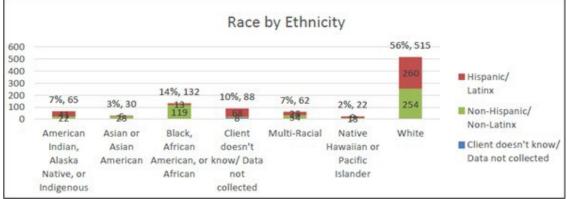


Table 7: Demographic Data by Age

By ethnicity, 56% of people identified as Hispanic/Latinx, as shown in Table 8 below.

 Table 8: Demographic Data by Race and Ethnicity



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

The fourth HOME-ARP QP is for "other populations" for whom providing supportive services or assistance would prevent homelessness or would serve those with the greatest risk of housing instability. To estimate the size and demographic composition of this QP, the County analyzed data on the individuals enrolled in the County's Homelessness Prevention System program in Calendar Year (CY) 2021. Additionally, the County also collected and analyzed one-year estimates on veterans in the County who are living below the poverty line from the 2021 American Community Survey (ACS).

Households earning 30 percent or less AMI, also referred to as extremely low-income (ELI) households, can be at-risk of homelessness, particularly if they are experiencing a cost burden greater than 50%.

In 2021, CHAS data indicate that there were 98,910 ELI households in the County. Of these households, 35 percent (34,600) were owners and 65 percent (64,310) were renters. The most common severe housing problem faced by this population was severe cost burden, with 61% (60,465) households spending 50% of monthly household income toward housing costs. Overall, 68% of ELI households with severe housing were renters and 32 percent were owners.

The County's Homelessness Prevention System (HPS) provides assistance to low-income families or individuals who are at-risk of losing their housing, including temporary financial assistance, legal support, case management, and other services. In 2021, the HPS assisted 2,838 households. Of these households, 89 percent (2,526) were households with 30% or less AMI, 9 percent (266) were households between 30% and 50% AMI, 1 percent (31) were households between 51% and 80% AMI, and 1 percent (15) were households with 80% and above AMI.

The following charts below shows demographic information for the 2,792 households enrolled in the HPS program in 2021 with 30% AMI or less (2,526 households) or 31-50% AMI (266 households).

Table 9 below provides a breakdown of the County's Homelessness Prevention System program households by age. Of the 2,792 households, 30% were between 35 and 44.

Table 9: Homeless Prevention Households Enrolled by Age

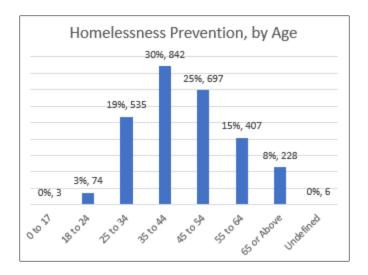


Table 10 below provides a breakdown of the County's Homelessness Prevention System program household by gender. Of the 2,792 households, 69% were female.



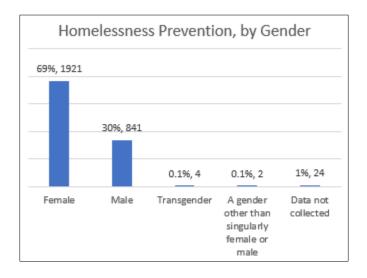


Table 11 below provides a breakdown of the County's HPS program by household type. Of the 2,792 households, 41% were households with children, 51% were single adult households, and 8% were households without children.

Table 11: Homeless Prevention System Households Enrolled by Household Type

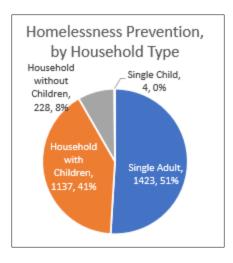
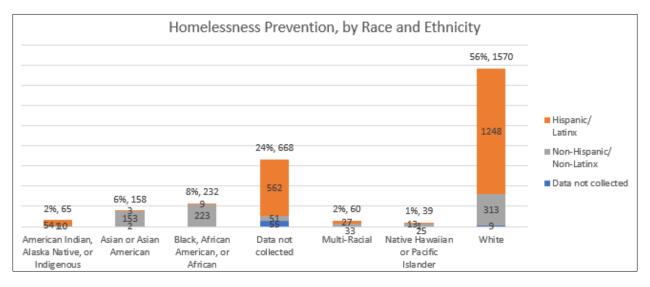


Table 12 below provides a breakdown of the HPS program households by race and ethnicity. Of the 2,792 households, 56% were White, 6% were Asian, 8% were Black/African American, and 24% refused to disclose their race. Of the 2,792 households, 69 percent were Hispanics, 29 percent were Non-Hispanics, and 2 percent refused to disclose their ethnicity.





Veterans Living Below the Poverty Line

Data from ACS provides information on the number of veterans in the County who are living below the poverty line. Although veterans are not a distinct HOME-ARP QP, HUD <u>Notice:</u> <u>CPD-21-10</u> states that veterans and their households that meet the criteria for one of the QPs are eligible to receive HOME-ARP assistance.

In 2021⁴, there were 45,065 veterans in the County, of whom 93 percent (41,798) were male and 7 percent (3,267) were female. 18 percent (8,347) had a disability and 8 percent (3,695) were

⁴ 2021: American Community Survey 1-Year Estimates: <u>B21001: SEX BY AGE BY VETERAN ... - Census Bureau Table</u>

living below the poverty line. As of November 1, 2021, 6,495 households were on the Community Queue, and of those, 6,495 283 are veterans. These clients have been assessed with the VI-SPDAT assessment and are awaiting housing.

Key demographic information available for these individuals is below:

- 92% of them identify as male, 6% as female, and 2% as transgender.
- The 55-64 age tier had the most (36%) veterans.
- 99% of households are single adults.
- By ethnicity, 78% identify as non-Hispanic/Latinx.

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 (Optional):

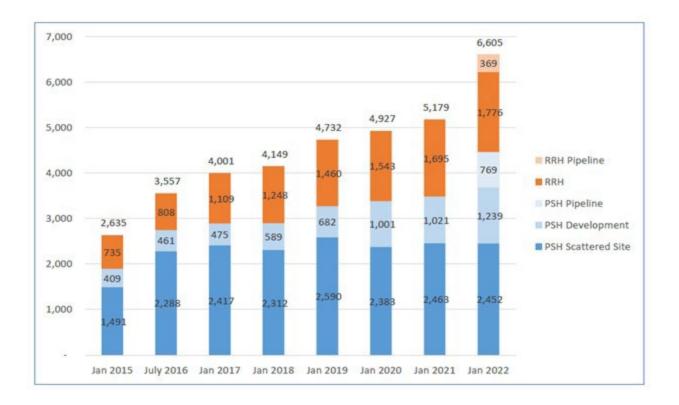
In 2016, Santa Clara County voters passed a \$950 million affordable housing bond with a goal of financing 4,800 new affordable and supportive housing units for the most vulnerable members of our community including 1,800 units of permanent supportive housing. Given the low vacancy rate in the rental market and the high cost of living, the County has taken a lead role in the production of affordable and supportive housing. Table 13 shows the status of the previously approved developments. While the County only has a remaining balance of approximately \$111 million, the Office of Supportive Housing anticipates meeting the goals of the housing bond.

Project Status	No. of Projects	No. of Units			
	, i i i i i i i i i i i i i i i i i i i				
In Operation	17	1,724			
Under Construction	15	1,543			
Secured All Financing	4	262			
Waiting for Tax Credit Allocation	5	574			
Applying for Soft Financing	8	1,067			
Waiting for Entitlements	1	TBD			
Total	50	5,170			

 Table 13: Status of Approved Affordable Housing Bond Developments

Since 2015, the County and its partners have made tremendous progress in increasing housing capacity. Chart 22 shows growth in the system but despite this growth, the need continues to grow, as shown in Table 14 below.

Table 14: Growth in Housing Capacity (2015 – 2022)



Through a partnership with the Santa Clara County Housing Authority, the County was able to leverage the one-time allocation of Emergency Housing Vouchers (EHVs). Our community received 1,033 vouchers and we currently have approximately 400 households in housing search. The EHV represents the biggest growth in tenant-based rental assistance programs in the past six years. Of the families in housing search, approximately 200 families have not been assigned a case manager to help provide them support after they are housed.

Finally, the County's Homelessness Prevention System pilot program has grown tremendously since it started in 2017. Today the system can support approximately 1,600 households. The Plan calls for an increase in the system to support 2,500 households annually. Most recently the demand for these services has increased dramatically, particularly in the post-pandemic time with rental protections expiring.

Additional current resources available to QPs include the following:

- Street-Based Outreach, referrals to services, shelter and housing to encampments
- Hygiene services
- Affordable housing units and supportive housing units under development
- Congregate beds and non-congregate shelter beds
- Rapid rehousing
- Transitional housing
- Emergency shelter / motel vouchers
- TBRA & Housing Choice Vouchers
- Emergency Rental Assistance

- Housing Opportunities for Persons With AIDS (HOPWA)
- Youth programs
- Homelessness prevention and housing problem solving
- Programs for Gender-Based Violence/Women in supportive housing
- Veteran's services
- Fair housing, housing rights, eviction help and diversion; legal services and education programs
- Employment development
- Food distribution

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

As of March 2023, there were a total of 5,967 unhoused individuals in the community queue. Of this total 86% are single adults, 8% include households with children, 4% are youth clients, and 2% are households without children. The Supportive Housing System has the capacity to serve 3,824 households who need a housing intervention of permanent supportive housing and has a utilization rate of 93%. Similarly, the system can support 1,715 households who require a rapid rehousing intervention and has a utilization rate of 83%. For families with children, the need for temporary shelter and permanent housing is greater. While families only represent 8% of households waiting in the community queue the resources that have historically been dedicated just for families are not sufficient. As of May 27, 2021, the Supportive Housing System had the capacity to serve 239 households nightly, 90% of which are in non-congregate shelter units. The additional capacity reflects various new programs including, but not limited to, the County's Casitas program, a hotel program operated by Amigos de Guadalupe, a City of San José-funded hotel voucher program operated by Lifemoves, the Mountain View Homekey program, and the Evans Lane Emergency Interim Housing Program. The latter two programs opened in mid and late-May 2021, respectively.

While we do not currently have sufficient capacity in the supportive housing system to house every single household, we currently have a gap in providing supportive services to 200 families with children that are enrolled in our local campaign to end family homelessness. The County has received an infusion of one-time assistance of Emergency Housing Vouchers, a robust housing production pipeline, and resources to support emergency interim housing and other non-congregate shelters. However, the one is of need that we have been unable to fill in around the supportive services that are needed by families with children that are enrolled in the Heading Home campaign.

At Risk of Homelessness as defined in 24 CFR 91.5

The Countywide Homelessness Prevention System pilot has the capacity to serve 2,161 households and has a utilization rate of 142%. With the expiration of the tenant protections,

households are at higher risk of becoming homeless and the most recent average per household cost is approximately \$12,000. Most recently the Board of Supervisions approved additional funding to support approximately 500 additional households. The County is also working with the local Managed Care Plans who have made a commitment of \$10 million in funding to support families who are at-risk of homelessness and the Behavioral Health Services Department has set aside \$3.5 million annually to support families who have a family member that is experiencing their first episode of psychosis and may become at-risk of losing their housing.

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

Understanding the needs of those fleeing is difficult to measure. However, the Office of Supportive Housing in partnership with the City of San Jose and the Victim Services providers have been working together through a Housing Workgroup to better understand needs and gaps.

An overview of the County's Community Queue data, a tool that measures the Homeless population in Santa Clara County, indicates that, as of November 1, 2021, 2,177, or 34%, of the 6,495 households currently on the Community Queue, self-report a background of domestic violence, and 788 reports they are currently fleeing domestic violence. The household capacity for victims of domestic violence as of November 2021 includes 59 units of permanent supportive housing, 75 units of rapid rehousing, and 73 units of emergency shelter or transitional housing, indicating that the need considerably outweighs the capacity.

Additionally, for any project type, clients who self-report that they are currently fleeing domestic violence at program entry demonstrate growth, indicating that there is a need for the supporting services and housing rental assistance that our programs provide to this demographic.

In 2017, 358 clients reported fleeing from domestic violence. In 2018, 462, in 2019, 725, in 2020, 745, in 2021, 930, and in 2022, 1,277 clients reported fleeing from domestic violence.

A system gap exists because most existing RRH programs are limited to two years (at the most) and most existing permanent supportive housing (PSH) programs are for individuals who have disabling conditions and/or are chronically homeless, which are eligibility requirements for most PSH programs funded by the U.S. Department of Housing and Urban Development's (HUD) Continuum of Care Program (CoC Program). Unfortunately, this work is ongoing and the needs analysis for this subpopulation has not been completed.

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

In the County of Santa Clara, extremely low-income renter households are disproportionately burdened by housing costs, and so are households who are earning the median family income for Santa Clara County of \$181,300; because of the unaffordability of our region, many are rent burdened. During the consultation process, across all forums, participants consistently reported that the largest gaps in their communities were in supportive services, particularly for households with children. Without supportive services, it can be challenging for individuals and households to maintain stable housing due to their health, finances, and other issues. Many stakeholders have preferences for the services they would like to see funded, including case management, financial assistance, rent arrears, tenant rights, and prevention of homelessness. Stakeholders stated a desire to serve all of the qualifying populations, including families with children, households affected by COVID-19, retired seniors, and people with disabilities.

Veterans:

The County, in collaboration with the City of San José, the Housing Authority, and Destination: Home, initiated the All the Way Home⁵ campaign in 2015. This collaboration continues to partner with the community's consortium of service providers with the aim of ending veteran homelessness. Veterans are housed using a variety of supports and initiatives, including landlord incentives and federal programs such as the Veteran Affairs Supportive Housing Program (VASH) and the Supportive Services for Veterans and Families (SSVF) program.

Highlights from the County's efforts to end homelessness for veterans include the following:

- Since November 2015, 2,579 veterans in Santa Clara County moved from homelessness to housing. Just over half of veterans who were housed received assistance from the VASH program, and more than 20% were supported via the SSVF program.
- Veterans exited transitional housing programs into permanent housing at higher rates than the system-wide population (36% versus 27%, respectively). While exits to permanent housing were similar to the system-wide population overall and RRH programs, veterans show lower exit rates to permanent housing destinations from Emergency Shelter programs. With the closing of FEMA Covid-19 hotels/motels and many veterans transferring to traditional emergency shelter programs, an increasing number exited from these programs to unknown or homeless destinations.
- Overall returns to homelessness for veterans is at 18% which is the same as the overall population. Returns to homelessness after exiting from Emergency Shelter programs is highest for both veterans (27%) and for the overall population (21%).
- The number of veterans placed into permanent housing consistently exceeds the number of homeless veterans seeking assistance for the first time. In the last 12 months, 127 veterans (an average of 11 per month) have sought housing assistance for the first time. During the same period, 264 veterans (an average of 20 per month) have been placed in permanent housing. This trend reflects the County's continuing robust efforts to end veteran homelessness.

⁵ <u>All the Way Home - Destination: Home (destinationhomesv.org)</u>

Families:

The County has identified a significant gap in the system of care for unhoused families. Through the prioritization of unhoused families for Emergency Housing Vouchers (EHVs), the County has been able to house 828 families, with 160 in the housing search process and 45 pending applications. However, EHVs do not include supportive services, which are critical to ensure successful housing placements for families. The County has been able to leverage some existing funding sources for supportive services, but these do not meet the needs for all families enrolled in EHV.

Between October 1, 2021 and March 31, 2023, an average of 71 families per month entered homelessness, as measured by the number who took the VI-SPDAT for the first time. During that same time period, an average of 51 families per month entered permanent housing, demonstrating the need for additional resources to serve this population. In addition, the 2023 Point-in-Time (PIT) Homeless Census showed a 36.5 percent increase in the number of unhoused families compared to the 2022 PIT Homeless Census data.

The County's Heading Home Campaign ⁶was launched in 2021 in an effort to end family homelessness by 2025. Since the launch, approximately 923 families with children have found permanent housing. The 2023 Point-in-Time Homeless Census counted 365 families consisting of 1,226 individual family members still experiencing homelessness in the County. The families experiencing homelessness subpopulation represented 13% of the homeless population.

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

There are currently estimated to be almost 10,000 unhoused people in Santa Clara County. The data presented earlier in this Allocation Plan indicates that there continue to be unmet needs within the County's supportive housing system, despite the success of the 2016 Measure A Affordable Housing Bond. The County has made significant progress toward expanding the supply of supportive housing, but there are still not enough units available to accommodate all the homeless individuals and households who would qualify for and benefit from supportive housing. Wrap-around supporting services are undoubtedly needed to give community members stability and support, so they are able to secure and maintain long-term permanent housing, especially because 40% (2,434) of the 6,157 clients on the Community Queue are chronically homeless.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here:

N/A the County is not proposing an additional definition.

⁶ <u>Heading Home – End Family Homelessness (headinghomesv.org)</u>

Identify priority needs for qualifying populations:

According to the feedback from the consultation process and the completed needs and gaps analysis, the County's needs are identified as being the provision of affordable housing, TBRA, and supportive services as a priority among all four QPs. The County is planning to utilize the HOME-ARP funds strategically to ensure that unmet needs and system gaps that are not already funded by other sources are given priority in order to have the biggest impact on all the QPs.

Although the need for more affordable and supportive housing is a key challenge in our community, the County's Board of Supervisors has approved 51 housing developments (5,100 new units) since 2016, using the County's 2016 Measure A Affordable Housing Bond. This is a significant expansion to our local supply of both affordable and supportive housing. Similarly, the Santa Clara County Housing Authority (SCCHA) offers voucher programs and rental properties that help make rental housing safe and affordable for over 20,000 low-income families and individuals. Through a partnership with SCCHA, the County is currently leveraging a one-time allocation of 1,033 Emergency Housing Vouchers (EHVs), which represents our largest growth in tenant-based rental assistance programs in the past six years.

Since the County is utilizing significant existing resources for the provision of affordable and supportive housing and TBRA, consultation process stakeholders and the needs and gaps analysis have identified funding for supportive services as the County's greatest need, especially for unhoused individuals and households with children. The County, therefore, proposes using its HOME-ARP allocation to fund supportive services.

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

Several data sources, including the CoC HMIS (2021), Point in Time Count, Santa Clara County Housing Authority Program Data, CDBG Program Statistics, Santa Clara County Study on Women and Homelessness (2020), National Low Income Housing Coalition, Out of Reach, and The Gap for Santa Clara County (2022), Census, and CHAS data, were carefully reviewed and analyzed to determine the level of need and gaps in the housing inventory and service delivery systems.

Additionally, Santa Clara County's Community Plan to End Homelessness 2020–2025 (Community Plan)⁷, which was developed in 2015 to create a roadmap for ending homelessness in Santa Clara County, was reviewed. The Community Plan is centered around a collective impact response and the proven Housing First model—setting an ambitious goal to create 6,000 new housing opportunities and identifying innovative strategies and programs for reducing homelessness.

The framework for the new Community Plan includes three strategies:

⁷ <u>CommunityPlan_2020.pdf (sccgov.org)</u>

- 1. Addressing the root causes of homelessness through system and policy change
- 2. Expanding homelessness prevention and housing programs to meet the need
- 3. Improving the quality of life for unsheltered individuals and creating healthy neighborhoods for all

The first two strategies focus on ending and preventing homelessness, and the third focuses on meeting the needs of unsheltered individuals.

Between January 2020 and December 2022, 9,645 people have been housed in Santa Clara County as a result of collective efforts. Over 3,500 people were housed in 2022 as a result of the coordinated efforts underway with the Heading Home Campaign. This is reflected in the fact that 23% of those housed are families with children. Further, 15,134 people were supported in county-wide temporary housing/shelter programs since 2020. Still, more permanent housing is needed.

When the region launched the Community Plan in 2020, for every household moving into permanent housing, another 2.5 became homeless. Since then, we have narrowed this gap significantly by both increasing the number of housing placements annually and reducing the number of people experiencing homelessness for the first time through the Homelessness Prevention System. In 2022, for every household moving to permanent housing, another 1.7 households became homeless for the first time.

We must continue to work on increasing the capacity of our supportive housing system to assist more people in moving out of homelessness and prevent more households from experiencing homelessness for the first time.

Finally, qualitative data was gathered through the various consultation meetings listed in the "Consultation" section of this Allocation Plan, which were attended by government agencies, nonprofit service providers, Urban County leadership, and advocacy groups. The County's understanding and identification of the housing inventory scarcity as well as the service delivery gaps have been made possible by the input of all of these stakeholders. The analysis of the aforementioned data was combined with an examination of all stakeholders' responses. The County has identified supportive services as the area with the greatest need.

HOME-ARP Activities

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

The County will be leveraging existing solicitations and contracts to meet this need. However, if there is a lack of capacity in existing providers, the County will include this service as part of an anticipated Request for Qualifications for Supportive Services. The County anticipates releasing this solicitation in late Summer and anticipates being ready to enter into contracts by January 2024.

Describe whether the PJ will administer eligible activities directly:

The County of Santa Clara will not directly administer specific HOME-ARP activities. The County will contract with subrecipients who will administer the eligible activities after being selected through a competitive County process.

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

HOME-ARP administration funds provided to the County will be used to support internal administration and planning costs for the County.

Use of HOME-ARP Funding

	Funding	Percent of	Statutory
	Amount	the Grant	Limit
Supportive Services	\$ 3,059,972		
Acquisition and Development of Non-	\$ 0		
Congregate Shelters			
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental	\$ 0		
Housing			
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 539,994	15 %	15%
Total HOME-ARP Allocation	\$ 3,599,966		

Table 4: Use of HOME-ARP Funding

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

The County plans to fill supportive service gaps with 85% of its HOME-ARP allocation and use the remaining 15% for HOME-ARP administration and planning. To fulfill the identified priority need of additional supportive services, the County will include these services in an upcoming Request for Qualifications for Supportive Services if there is a lack of capacity among current providers. While there are insufficient resources in our community to meet the need, the HOME-ARP funds will address the current service gap and offer necessary supportive services across the four QPs residing throughout the Urban County limits.

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:

All of the HOME-ARP eligible activities are necessary to have the greatest impact on all the QPs, however, we must be strategic in how we use the HOME-ARP funds to ensure we are prioritizing unmet needs and system gaps which are not already funded by other sources. For example, although affordable and supportive housing are a critical need for our community, we are currently leveraging the 2016 Measure A Affordable Housing Bond to construct this housing. Supportive services for unhoused families was recognized as the greatest need by many stakeholders and the needs and gap assessment support this use of funds. Therefore, the County proposes to employ alternative state and federal funding for other HOME-ARP eligible activities and to use its HOME-ARP allocation to fund supportive services.

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:

N/A; The County is not proposing to develop new affordable and supportive housing with the HOME-ARP dollars.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs: N/A; The County is not proposing to develop new affordable and supportive housing with the HOME-ARP dollars.

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:

The County would like to adopt a preference for individuals or households with children who fall within the homeless qualifying population. Individuals or households without children who fall within the homeless qualifying population will receive secondary preference.

Preferences are used to establish the order in which applicants are admitted to the HOME-ARP program. Families with children within the qualifying populations will be prioritized first for supportive services based on Coordinated Entry (CE), locally referred to as the Community Queue. CE will be used for direct referrals. All other eligible QP applicants (who do not qualify as homeless with children) will still be eligible to apply or be referred to the HOME-ARP program. This preference will require eligible QP applicants who are homeless with children to be selected before eligible QP applicants who do not qualify as individuals or households who are homeless with children. This preference refers to people who are experiencing homelessness as part of a household that has at least one adult (age 18 and older) and one child (under age 18),

including families with infants and pregnant women. Individuals or households without children who fall within the homeless qualifying population will receive secondary preference. The implementation of this preference will not exclude or remove the eligibility of any QP from our HOME-ARP program.

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

The use of a preference for the homeless-qualifying population with children and homeless qualifying population without children will prioritize the people who need the most access to supportive services. Based on the County's needs and gap assessment and the feedback collected during the consultation process, it is apparent that the preference and method of prioritization will address the needs of the QPs within our county, which includes supporting clients with supportive services for day-to-day needs.

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:

An established preference will not exclude or remove the eligibility of any QP from our HOME-ARP program. The other QPs will still be eligible for the HOME-ARP program; additionally, the County will continue to service the needs of the populations by utilizing other existing programs.

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

The County will have multiple referral methods to ensure all QPs are served. Referrals will be provided through the CE process and the County's Homelessness Prevention System to ensure applicants from all QPs can be served.

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

The County's CE does not currently include all four QPs. As a result, the County will utilize CE, as well as the County's Homelessness Prevention System, so that all QPs may be served.

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

The County intends to use CE and its Homelessness Prevention System to refer eligible applicants to the HOME-ARP supportive services program. In the County's CE system, homeless individuals and households complete the Vulnerability Index – Service Prioritization Decision Assistance Prescreen Tool (VI-SPDAT) that considers the household's situation and identifies the best type of housing intervention to address their situation. A Community Queue of eligible households is generated from the standard assessment. The Community Queue is used to fill spaces in supportive housing programs, including permanent supportive housing and rapid rehousing, in the county. This coordinated process reduces the need for people to travel the county seeking assistance from every service provider separately. For the HOME-ARP program, the County will give preference first to homeless households with children. Homeless individuals and households without children will receive secondary preference.

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

The following is a list of the referral methods the County proposes to use in order of priority for HOME-ARP assistance:

- 1. The County will use and prioritize CE for individuals or households with children within the qualifying homeless population. Qualified applicants will be selected for services based on their level of vulnerability, which is determined through the VI-SPDAT assessment.
- 2. Additionally, CE will be used for individuals or households without children within the qualifying homeless population. Qualified applicants will be selected for services based on their level of vulnerability, which is determined through the VI-SPDAT assessment.
- 3. For the other three QPs, the County will be utilizing the County's Homelessness Prevention System (HPS). The HPS is open to everyone in Santa Clara County, including the other three QPs, and prioritizes people for services based on their level of risk of becoming unhoused, which is determined through the Homelessness Prevention Assessment Tool (HPAT).

Those who are literally unhoused are not eligible for services through the HPS and would instead be served through the CE.

HOME-ARP Refinancing Guidelines

The County does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing.

• 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

N/A; the County is not proposing to use HOME-ARP funding to rehabilitate existing multifamily housing.

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

N/A; the County is not proposing to use HOME-ARP funding to rehabilitate existing multifamily housing.

• State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both. N/A: the County is not proposing to use HOME-ARP funding to rehabilitate existing

N/A; the County is not proposing to use HOME-ARP funding to rehabilitate existing multifamily housing.

- Specify the required compliance period, whether it is the minimum 15 years or longer. N/A; the County is not proposing to use HOME-ARP funding to rehabilitate existing multifamily housing.
- State that HOME-ARP funds cannot be used to refinance multifamily loans made or *insured by any federal program, including CDBG*. N/A; the County is not proposing to use HOME-ARP funding to rehabilitate existing

N/A; the County is not proposing to use HOME-ARP funding to rehabilitate e multifamily housing.

• *Other requirements in the PJ's guidelines, if applicable:* N/A; the County is not proposing to use HOME-ARP funding to rehabilitate existing multifamily housing.