



**HOME INVESTMENT PARTNERSHIPS PROGRAM
– AMERICAN RESCUE PLAN (HOME-ARP)
ALLOCATION PLAN**

FISCAL YEAR 2021/2022

**Revision No. 1
Re-Submitted to HUD
October XX, 2023**

**City of Moreno Valley
City Manager's Office
Grants Division
14177 Frederick Street
Moreno Valley, CA 92553**

**City of Moreno Valley
HOME-ARP Allocation Plan**

TABLE OF CONTENTS

INTRODUCTION..... 1

HOME-ARP ELIGIBLE QUALIFYING POPULATIONS AND ACTIVITIES 1

CONSULTATION..... 2

PUBLIC PARTICIPATION..... 10

NEEDS ASSESSMENT AND GAP ANALYSIS 11

HOMELESS (AS DEFINED IN 24 CFR 91.5 HOMELESS (1), (2), OR (3))..... 11

AT-RISK-OF-HOMELESSNESS (AS DEFINED IN 24 CFR 91.5)..... 15

FLEEING OR ATTEMPTING TO FLEE DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, STALKING OR HUMAN TRAFFICKING 16

OTHER POPULATIONS –INSTABILITY OF HOUSEHOLDS PAYING 50% IN RENT 18

HOME-ARP ACTIVITIES..... 22

USES OF HOME-ARP FUNDING..... 23

HOME-ARP PRODUCTION HOUSING GOALS 25

PREFERENCES & PRIORITIZATION 25

REFERRAL METHODS 26

LIMITATIONS..... 27

Introduction

The City of Moreno Valley has been allocated \$2.4M of HOME- American Recovery Plan Act (HOME-ARP) funding from the U.S. Department of Housing and Urban Development (HUD). To receive the HOME-ARP allocation, the City must develop a HOME-ARP Allocation Plan (AP) that will become part of the City's FY 2021-2022 HUD Annual Action Plan by substantial amendment.

The HOME-ARP Allocation Plan must include:

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

HOME-ARP Eligible Qualifying Populations and Activities

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

The American Rescue Plan Act (ARP) defines qualifying individuals or families (aka Qualifying Populations or QPs), including Veterans, which are:

1. Homeless, as defined 24 CFR 91.5 *Homeless* (1), (2), or (3);;
2. At risk of homelessness, as defined in 24 CFR 91.5 *At risk of homelessness*;
3. Fleeing, or attempting to flee domestic violence, dating violence, sexual assault, or stalking (as defined by HUD in 24 CFR 5.2003) or human trafficking (as outlined in the Trafficking Victims Protection Act of 2000 as amended [22 USC 7102]); and
4. Other Populations who do not qualify under any of the populations above but meet one of the following criteria:
 - a. Other Families Requiring Services or Housing Assistance to Prevent Homelessness
 - b. Those At Greatest Risk of Housing Instability

- c. Veterans and Families that include a Veteran Family Member that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

Eligible activities include:

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

Consultation

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

HUD requires each HOME-ARP Participating Jurisdiction (PJ) to consult with agencies and service providers whose clientele include the HOME-ARP qualifying populations. Agencies consulted must at a minimum include the Continuum of Care (CoC) serving the PJ'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. States are not required to consult with all Continuums of Care or PHAs in their jurisdiction.

To ensure broad input into the HOME-ARP allocation plan from stakeholders, beginning January 2023 through February 2023, the City engaged in consultation with stakeholders through a series of virtual meetings, phone interviews, and written surveys. Surveys were emailed to 280 public and private agencies and virtual meetings invitations were sent to 24 of these same agencies serving the various QPs.

The goals of the surveys and virtual meetings were to: (1) identify the needs and gaps in services to the various QPs; (2) prioritize the gaps identified, and (3) quantify as much as possible the gaps identified.

Most respondents listed affordable low-income housing as a top need.

List the organizations consulted:

**Table 1
City of Moreno Valley
Organizations Consulted**

Agency/Organizations Consulted	Type of Agency/Organization	QP Served	Method of Consultation	Date of Consultation	Needs/Gaps Feedback
Riverside County Continuum of Care (CoC)	Public Agency	Homeless; At-Risk of Homelessness	1/3/23-Email Invitation to Phone consult / Survey	1/18/2023-Phone consult	The RivCo CoC provided several publications and data sets quantifying needs and gaps including the 2022 MoVal Point in Time stats, the MoVal Housing Inventory Count (HIC) and the 2022 RivCo Homeless Action Plan. Gaps included, but were not limited to, insufficient housing affordability, lack of permanent supportive and rapid rehousing units, lack of supportive services, lack of funds for move-in assistance.
Housing Authority of the County of Riverside (HACR)	Public Agency	Homeless; At-Risk of Homelessness	1/3/23-Email Invitation to Phone consult / Survey	No Response. Feedback from RivCo Allocation Plan incorporated by permission.	The HACR identified lack of affordable housing as a major need, after someone is approved for a voucher finding a unit is extremely difficult.
Riverside County Office of Aging	Public Agency	Homeless; At-Risk of Homelessness Seniors	1/3/23-Email Invitation to Phone consult / Survey	No Response. Feedback from RivCo Allocation Plan incorporated by permission.	OOA supported the need to direct funds toward the production of affordable permanent housing for the elderly homeless population.

**Table 1
(continued)**

Agency/Organizations Consulted	Type of Agency/Organization	QP Served	Method of Consultation	Date of Consultation	Needs/Gaps Feedback
Riverside County Department of Veterans Services	Public Agency	Homeless; At-Risk of Homelessness Vets	1/3/23-Email Invitation to Phone consult / Survey	No Response. Feedback from RivCo Allocation Plan incorporated by permission.	Veterans' Services was consulted about HOME-ARP qualifying populations, and activities. Needs described included: Affordable Housing, Transitional Housing, Wrap Around Services, and Shelters, as well.
Riverside University Health System-Behavioral Health	Public Agency	Homeless; At-Risk of Homelessness Disabled	1/3/23-Email Invitation to Phone consult / Survey	No Response. Feedback from RivCo Allocation Plan incorporated by permission.	RUHS oversees the County of Riverside's Coordinated Entry System (CES) and they agreed to provide referrals from the CES for HOME ARP funded affordable housing developments.
Mary Erickson Community Housing	Private Developer	Homeless Affordable housing	1/3/23-Email Invitation to Phone consult / Survey	1/19/2023-Survey received	More high density affordable housing, especially for students. Provide TBRA and Section 8 vouchers.
Neighborhood Partnership Housing Services	Private Not-for-Profit	Homeless Affordable housing	2/1/23-Email Invitation to Phone consult / Survey	2/7/23-Video consult and survey	Need more affordable housing; more homeowner counseling & foreclosure counseling.
The Salvation Army	Private Not-for-Profit	Homeless; At-Risk of Homelessness	1/3/23-Email Invitation to Phone consult / Survey	1/12/2023-Video consult	Lack of transitional housing; mentoring to get people back on their feet.

**Table 1
(continued)**

Agency/Organizations Consulted	Type of Agency/Organization	QP Served	Method of Consultation	Date of Consultation	Needs/Gaps Feedback
Lutheran Social Service of Southern California	Private Not-for-Profit	Homeless; At-Risk of Homelessness	1/3/23-Email Invitation to Phone consult / Survey	1/12/2023-Video consult	Transitional housing units for long term (24 month) counseling addressing mental issues, credit, finances, employment, drug addiction.
Inland So Cal United Way	Private Not-for-Profit	Homeless; At-Risk of Homelessness; Fleeing violence	1/3/23-Email Invitation to Phone consult / Survey	2/1/23-Video consult and survey	More affordable housing especially for singles college grads and women with children fleeing domestic abuse; more rental assistance; transitional services like employment services; sited Wellness Center in Victorville as an example of full scope project. Also, streamlining the process for approval.
Catholic Charities	Private Not-for-Profit	Homeless; At-Risk of Homelessness	1/3/23-Email Invitation to Phone consult / Survey	No Response	No Response.

**Table 1
(continued)**

Agency/Organizations Consulted	Type of Agency/Organization	QP Served	Method of Consultation	Date of Consultation	Needs/Gaps Feedback
First Serv Foundation	Private Not-for-Profit	Homeless; At-Risk of Homelessness	1/24/23- Email invitation to Phone consult	1/24/2023- Phone consult	More affordable housing/mental health services/financial management for vets (especially females), seniors, disabled. Incomes not sufficient to cover local housing costs. Need more temporary housing coupled with extensive case management and mandatory education to deal with issues of mental health, unemployment, personal budgeting, and other barriers to sustainability and movement to permanent housing.

**Table 1
(continued)**

Agency/Organizations Consulted	Type of Agency/Organization	QP Served	Method of Consultation	Date of Consultation	Needs/Gaps Feedback
U.S. Veterans	Private Not-for-Profit	Homeless; At-Risk of Homelessness; Disabled Vets;	1/3/23-Email Invitation to Video consult / Survey	2/2/23-Video consult and survey	More affordable housing as 50% of vets (about 500 in 2022) were turned away due to lack of affordable housing; Lack of transitional housing facilities for homeless like the US Vets MoVal facility; Fast tracking mental health assistance; Lack of child and senior care for vets trying to work; Improve access to critical documents like (birth certificates, etc.); Lack of available transportation to jobs, medical; Reducing red tape in screening services and centralizing screen function.
Assistance for Vets	Private Not-for-Profit	Homeless; At-Risk of Homelessness Vets	1/3/23-Email Invitation to Survey	1/17/23-Survey received	Shortage of housing vouchers and affordable village type housing for vets like those built by U.S. Vets. Mental health issues creating barriers to employment are not being addressed.

**Table 1
(continued)**

Agency/Organizations Consulted	Type of Agency/Organization	QP Served	Method of Consultation	Date of Consultation	Needs/Gaps Feedback
Reset Project	Private Not-for-Profit	Homeless; Domestic Violence	1/3/23-Email Invitation to Video consult / Survey	1/7/2023-Survey received	More TBRA; affordable housing (min 50 units), basic essentials; Must have counseling on basic life skills; treatment of mental health issues all to promote sustainability.
Riverside County Sherriff	Public Agency	Victims of Domestic Violence/Sexual Assault/Stalking/ Human Trafficking	1/3/23-Email Invitation to Video consult / Survey	2/22/23-Crime Stats Provided	City is second only to Riverside in violent crime. More assistance for victims is needed.
SAFE Family Justice Center	Private Not-for-Profit	Victims of Domestic Violence/Sexual Assault/Stalking/ Human Trafficking	1/25/23-Email Invitation to Phone consult / Survey	1/25/2023-Phone consult	Lack of affordable permanent supportive housing for victims of domestic violence.
Riverside Area Rape Crises Center	Private Not-for-Profit	Victims of Domestic Violence/Sexual Assault/Stalking/ Human Trafficking	1/3/23-Email Invitation to Video consult / Survey	2/8/23-Email Invitation to Video consult / Survey	Need shelter for domestic violence victims as there is none in City or County; Lack of sufficient administration budget for necessary case manager/admin staff to follow up with victims in long term.

**Table 1
(continued)**

Agency/Organizations Consulted	Type of Agency/Organization	QP Served	Method of Consultation	Date of Consultation	Needs/Gaps Feedback
Operation Safe House	Private Not-for-Profit	Victims of Domestic Violence/Sexual Assault/Stalking/ Human Trafficking	1/3/23-Email Invitation to Video consult / Survey	2/1/23-Video consult and Survey	More affordable housing; Major drug rehab services.
Voices for Children	Private Not-for-Profit	Victims of Domestic Violence/Sexual Assault/Stalking/ Human Trafficking	1/3/23-Email Invitation to Video consult / Survey	1/31/23-Video consult and Survey	VFC stated need for more dental health for children terming out of foster care.
Fair Housing Council of Riverside County	Private Not-for-Profit	Civil Rights/ Fair Housing	1/3/23-Email Invitation to Video consult / Survey	No Response	No Response.

Summarize feedback received and results of upfront consultation with these entities:

The public and private agencies consulted were asked to prioritize the four activities eligible with the HOME-ARP funds based on the needs and service gaps to the QP’s. The following is the outcome of the prioritization activity for those agencies that provided input.

1. Develop and Support more Affordable Low-Income Rental Housing.
2. Provide more wrap around/transitional services, such as counseling and mental health services
3. Provide more rental assistance.
4. Increase availability of non-congregate shelter units

The lack of affordable low-income rental housing in the City, and Riverside County in general, was a top concern for a majority of agencies consulted (13 of the 18 responses listed above). The populations most impacted were households with Extremely Low Income (ELI) at 30% or less AMI for Riverside County and recently evicted persons, families fleeing domestic violence, and seniors. Several stakeholders listed the elderly and seniors amongst the populations with the greatest need for permanent affordable low-income housing. Additional information on homeless seniors was made available from the County of Riverside’s meeting with the Riverside County Office on Aging (OOA). OOA supported the need to direct funds toward the production of affordable low-income housing for the elderly homeless population due to the challenges seniors face in finding and keeping affordable low-income housing. The OOA stated, “The most notable difference between older and younger homeless adults is the older adults’ compromised health status; one study found that they were 3.6 times as likely to have a chronic medical condition as homeless adults under 50.”

The Riverside County Homeless Action Plan, dated January 2022, describes the overall affordable low-income housing shortage in the area:

”Homelessness in Riverside County must be understood in context of Riverside County’s overall lack of affordable housing. The Riverside-San Bernardino-Ontario metropolitan area has one of the most severe shortages of affordable homes in the country, with only 18 affordable and available homes per 100 renter households. 58.6% of Riverside County renters are considered rent burdened by HUD, paying more than 30% of household income on rent. This is higher than state and national averages as, in the same year, 49.6% of American renters and 54.8% of Californian renters were considered rent burdened. Riverside County’s housing stock is mostly composed of single family detached homes, which make up 68.3% of the housing stock. Only 17.4% of the county’s housing stock is in a complex with 2 or more units, compared to 31.4% at the state level and 26.3% at the national level.”

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:*** September 15, 2023
- ***Public comment period:*** Beginning September 15, 2023, and ending September 29, 2023
- ***Date(s) of Council Public Hearing:*** October 3, 2023

Describe the public participation process:

HUD requires each Participating Jurisdiction to 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 state may undertake.

Public participation was solicited through a 15-Day public comment period. The City provided a 15-day public comment period for the proposed HOME-ARP Allocation Plan beginning September 15, 2023, ending September 29, 2023. The City council approved the HOME-ARP Allocation Plan at the regularly scheduled council public hearing on October 3, 2023. A combined notice of public comment period was published in both English and Spanish in local newspapers of general circulation on September 15, 2023. Accommodations for the disabled and Spanish language participants were provided at the October 3, 2023 council meeting.

Describe efforts to broaden public participation:

The HOME-ARP Allocation Plan was posted on the City website, a notice of availability was posted to the City’s various social media sites, and an information bulletin notifying stakeholders and the public was distributed via City mailings.

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

There were [TBD] comments received during the public comment period. These comments are summarized in **Attachment 1** - Summary of Public Comments.

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

Needs Assessment and Gap Analysis

The needs assessment and gap analysis must evaluate the 1) size and demographic composition of HOME-ARP qualifying populations, and 2) unmet needs of HOME-ARP qualifying populations. In addition, the needs assessment and gap analysis must identify any gaps within its current shelter and housing inventory, and service delivery system. This needs assessment and gap analysis focuses on the following populations:

1. Homeless - sheltered and unsheltered (QP1);
2. Households At-Risk of Homelessness (QP2);
3. Those Fleeing violence, dating violence, stalking and human trafficking (QP3); and
4. Those at greatest risk of housing instability or unstable housing situations (QP4).

The City utilized the following publications that highlighted the needs and gaps in the City and Riverside County as a whole.

1. City of Moreno Valley Housing Element 2021-2029 dated October 2022
2. Riverside County 2022 Homeless Action Plan dated January 2022
3. Riverside County 2023 Homeless Point-In-Time Count and Survey dated May 2023
4. Riverside County Performance Assessment and Gap Analysis dated June 2021
5. HUD Comprehensive Housing Affordability Strategy (CHAS) data for 2016-2020, released September 5, 2023

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

Homeless (as defined in 24 CFR 91.5 Homeless (1), (2), or (3))

In partnership with the County of Riverside, the City participated in the 2023 Homeless Point-in-time (PIT) count that was conducted on January 25, 2023. Both the sheltered and unsheltered homeless data collected is being used for this analysis. The 2023 PIT revealed the City of Moreno Valley experienced 77 unsheltered homeless. Of the 77 unsheltered persons, the majority were living in the streets (45%), or in a vehicle (29%). Others were living in tents or sheds (7%), in abandoned buildings (7%), in an encampment (7%), in a park (4%), or under a bridge (2%). 41%

of the unsheltered persons interviewed were homeless for the first time. Of the 77 unsheltered homeless, 53% were “White” (this includes Hispanics), 31% were “Black, African American, African”, 14% identified as being “multiple races”, and 1% were “Asian, Asian American”. Of the 77 unsheltered persons, 10, or about 13% were elder adults over the age of 55. In 2022 similar, but not identical, stats were used, showing 9% of the 77 unsheltered homeless were seniors, age 60 or over. This shows an increase of 3 seniors (elder adults) that are homeless in the City, which is a 43% increase year over year. This count does not include “sheltered” homeless seniors. This approximate change within the City is corroborated by the County’s statistics from the 2023 PIT report , which shows a year over year 6% increase in homeless seniors, a 26% decrease in sheltered homeless seniors, and a 47% increase in unsheltered seniors. Additionally, the report identifies 1) Family Disruption, 2) Lack of Income, and 3) Unemployment as the top three primary factors contributing to unsheltered homelessness. Seniors are especially vulnerable to these factors, which have been exasperated by the COVID 19 Pandemic. Seniors tend to live on a fixed income. Many are not able to work due to age related issues or chronic health issues. According to the state of California’s Homeless Data Integration System (HDIS) seniors are the fastest growing homeless group. From 2017 to 2021 California’s senior population grew by 7%, but the number of people aged 55 and over who sought homeless services increased 84%, more than any other group. Those at increased risk of losing shelter tend to be older adults who live alone and on fixed incomes. The Federal Social Security Administration maximum federal SSI payment in 2023 for a single individual is \$914, and for a couple is \$1,371. That would put all seniors relying solely on SSI payments well below 30% AMI for an individual (\$1,633) or a couple (\$1,866).

Table 2 below shows the number of unsheltered and sheltered homeless identified in the 2023 PIT.

DRP

**Table 2
City of Moreno Valley
2023 Homeless Point-in-Time Count**

CITY OF MORENO VALLEY		
Unsheltered	Sheltered	Total
77	24	101

Race (all)	Count	Percent %
<i>American Indian, Alaskan Native, Indigenous</i>	0	0%
<i>Asian, Asian American</i>	1	1%
<i>Black, African American, African</i>	24	31%
<i>Native Hawaiian, Pacific Islander</i>	0	0%
<i>Multiple Races</i>	11	14%
<i>White</i>	41	53%
Total	77	100% *

**Percentages do not add up to 100% due to rounding*

Age	Count	Percent %
<i>Children (≤17)</i>	0	0%
<i>Youth (18-24)</i>	14	18%
<i>Adults (25-34)</i>	18	23%
<i>Adults (35-44)</i>	20	26%
<i>Adults (45-54)</i>	15	19%
<i>Adults (55-64)</i>	7	9%
<i>Adults (65+)</i>	3	4%
Total	77	100% *

**Percentages do not add up to 100% due to rounding*

The annual Housing Inventory Count (HIC) provides useful context regarding the number and type of beds and units that are available for individuals and families experiencing homelessness on any given night. Table 3 below summarize beds and units available in 2022 in the City by bed type as provided in consultation with the Riverside County CoC.

1. Emergency housing beds include emergency shelter and transitional housing; emergency shelter generally allows for short-term or nightly stays, while transitional housing generally allows for a stay up to 24 months. Both types of emergency housing may include supportive services designed to facilitate movement to independent living.
2. Rapid rehousing provides security and utility deposits and/or monthly rental and utility assistance for rental units that rent for less than the fair market rent. Assistance is generally provided for the shortest period of time necessary for a household to gain stable housing and can range from 3 to 24 months. Permanent supportive housing provides for an unlimited lease term; residents receive services necessary to promote continued housing stability.

Table 3 below shows the 2022 HIC inventory for the City as provided by the RivCo CoC. There remain **only 2 available transitional housing beds** for the 77 unsheltered homeless (12 beds per the HIC inventory less 10 sheltered per the 2022 PIT count). Although Rapid Rehousing and Permanent Supportive beds totaled 196 for 2022, those beds were not necessarily available to or accepted by the existing and new homeless individuals in the City.

Table 3
City of Moreno Valley
2022 Housing Inventory Count

Emergency Housing Beds Available 2022								
	Current Inventory					Beds for Subpopulations		
	Family Units	Family Beds	Households with Children	Child-Only Beds	Total Year Round Beds	Chronic	Veterans	Youth
Emergency Shelter	0	0	0	0	0	0	0	0
Transitional Housing	0	0	12	0	12	0	12	0
Total Emergency Housing Beds	0	0	12	0	12	0	12	0

Rapid Rehousing and Permanent Supportive Housing Available 2022								
	Current Inventory					Beds for Subpopulations		
	Family Units	Family Beds	Households with Children	Child-Only Beds	Total Year Round Beds	Chronic	Veterans	Youth
Rapid Rehousing	28	97	29	0	126	0	15	3
Permanent Supportive Housing	15	52	18	0	70	29	0	0
Total Year Round Beds	43	149	47	0	196	29	15	3

Source: Riverside County Continuum of Care

The Riverside County 2021 Gaps Analysis report cited the following as gaps:

- Lack of housing affordable to the Extremely Low-income Population
- Lack of Permanent Supportive and Rapid Rehousing opportunities.
- The accessibility and usefulness of Housing Choice Vouchers.

This data aligns with stakeholder feedback regarding the need for more affordable low-income housing. The City also believes that certain supportive services, such as those legal services listed in Use of HOME-ARP Funding below, will assist the homeless with reducing the barriers that contribute to homelessness.

At-Risk-Of-Homelessness (as defined in 24 CFR 91.5)

Table 4 below shows a 2016 comparison of the number of households in the City “At-Risk-Of-Homelessness” due to eviction compared to the State of California and County of Riverside. Households in the City were shown to be at greater risk than households in these larger jurisdictions.

**Table 4
City of Moreno Valley
2016 Eviction Notices Filed**

Jurisdiction	Population	Evictions	Eviction Rate
State of California	39.1 million	147,000	0.38%
County of Riverside	2.38 million	10,500	0.44%
City of Moreno Valley	204,308	956	0.47%

Source: Eviction Lab

Since the COVID-19 pandemic began in 2020, households, especially those of extremely low-income minorities, were at greater risk as the U.S. economy was “shuttered in place”, and many families lost their jobs and became delinquent in housing payments. The national and statewide moratoriums on eviction protection for renters helped delay families from losing their residence for almost two years, but only created an accumulation of rent delinquency as families redirected limited resources to basic needs over rent.

This accumulation of delinquent rent became a national crisis that was partially mitigated by programs such as the CARES Act Emergency Solutions Grants (ESG-CV) for homelessness and homeless prevention, and U.S. Treasury Department “Emergency Rental Assistance” (ERA) programs, which were funded through American Rescue Plan legislation. With grant funding from both ESG-CV and ERA, the City was able to cure delinquencies for over 2,300 households in the City between 2021 and 2022, as shown in Table 5. Of the assisted households, 1,308 (56%) were households with annual income at 50% or less than the Average Median Income (AMI) for Riverside County and paid 50% or more of household income in rent.

Table 5
City of Moreno Valley
ESG-CV/ERA Rental Assistance Provided
2021-2022

CITY OF MORENO VALLEY			
Household (HH) % AMI	Total Served	HH that pay 50% of Reported Income in Rent	% of Total Served
below_30	827	661	80%
between_30_50	741	647	87%
between_50_80	736	679	92%
Total	2,304	1,987	86%

Source: Inland SoCal United Way

However, since September 30, 2022, both federal and California COVID related eviction protections expired, and ESG-CV and ERA funds have been nearly exhausted, elevating the number of households at risk of eviction in the City. Inland SoCal United Way (ISCUW), the City’s ERA sub-grantee, has received hundreds more applications for additional rental assistance from residents in the City that may not be served with the limited ESG-CV and ERA resources remaining, leaving a gap in helping those families most “At-Risk of Homelessness”.

Table 5 above highlights those rental unit households that that are paying over 50% of the reported family income in rent and are at the greatest risk of housing instability, especially those at the Extremely Low Income (ELI) <30% or below AMI for Riverside County, which accounted for 661 (27%) of the 2,304 households assisted by the City’s ERA program. Table 8 below further shows the number of renter households in the entire City earning <30% AMI, and 30%-50% AMI that pay more than 50% of their income to rent.

The City believes that certain supportive services, such as those legal services listed in **Use of HOME-ARP Funding** below, will assist households in reducing certain at-risk-of-homelessness conditions including those listed in Table 8.

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

Consultation by the County of Riverside with SAFE Family Justice Centers revealed that families or individuals fleeing domestic or dating violence need increased safety measures to minimize the risk of returning to unsafe residential environments. QP3 has a critical need for temporary shelter for safe harboring, and supportive services (i.e., legal advocacy, childcare, employment services, and case management) to help them transition to permanent supportive housing. Based on the 2011 Executive Management Report produced by SAFE Family Justice Centers of Riverside County, there has been an increase in domestic violence following the COVID-19 pandemic, increasing the need to provide families with safe housing opportunities and supportive services.

Table 6 below shows 2021 crime statistics for the City as reported by the Riverside County Sheriff for sexual assault, rape, domestic violence and child abuse. Clearly domestic violence (DV) and sexual assault are the most significant with a total of 781 (37 + 744) cases reported.

Table 6
City of Moreno Valley
2021 Domestic Violence Cases

	SEXUAL		DOMESTIC	CHILD
City	ASSAULT	RAPE	VIOLENCE	ABUSE
MORENO VALLEY	37	22	744	262

Source: Riverside County Sheriff Department

Furthermore, Table 7 below shows the 2023 unsheltered PIT identified 16 (29%) of the respondents experiencing unsheltered homelessness in the City, became homeless as a result of family disruption, and 5 (9%) as a result of domestic violence. Family disruption could be caused by domestic violence, or sexual assault among other causes resulting in homelessness for the fleeing victim. People are considered sheltered when they are residing in emergency shelter or transitional housing, but not when they are receiving rapid rehousing assistance or residing in permanent supportive housing.

Table 7
City of Moreno Valley
2023 PIT Reasons for Homelessness

Reasons for Homelessness (interview, not mutually exclusive)		
<i>Reason</i>	#	%
Family Disruption	16	29%
Domestic Violence	5	9%
Jail Release	1	2%
Lack of Income	11	20%
Medical Discharge	1	2%
Mental Illness	2	4%
Runaway	1	2%
Substance Abuse	1	2%
Unemployment	3	5%
Other	9	16%

Source: Riverside County 2023 Point In Time Homeless Count

The 2021 *NNEDV Domestic Violence Counts Report-California Summary* reported the underfunded needs for victims of DV included emergency shelter, housing, transportation, childcare and legal representation, among other services.

The City believes that certain supportive services, such as those legal services listed in **Use of HOME-ARP Funding** below, will assist in reducing homelessness caused by domestic violence, dating violence, sexual assault, and human trafficking.

Other Populations –Instability of Households Paying 50% in Rent

Table 8 below shows that there were 3,460 households in Moreno Valley in 2022 earning <30% AMI and paying over 50% of their income in rent, putting them at greatest risk of falling behind in rent and facing eviction without assistance. The City website currently lists 1,235 affordable low-income units in the City among 24 apartment complexes. Assuming the rent on these units is less than market with the help of Section 8 vouchers, the gap in affordable low-income housing is estimated at 2,225 units for <30% AMI households paying over 50% of household income in rent.

**Table 8
City of Moreno Valley
Renter Households at Risk of Homelessness**

CITY OF MORENO VALLEY	
Affordable Rental Unit Gap (Renters Only)	
Income by Cost Burden (Renters Only)	Cost Burden >50%
Renter Households with Income <30% AMI paying more than 50% of income for rent (including utilities)	3,460
Renter Households with Income 30% to 50% AMI paying more than 50% of income for rent (including utilities)	1,755
Renter Households with Income 50% to 80% AMI paying more than 50% of income for rent (including utilities)	600
Renter Households with Income 80% to 100% AMI paying more than 50% of income for rent (including utilities)	45
Renter Households with Income > 100% AMI paying more than 50% of income for rent (including utilities)	-
Total Affordable Units Needed	5,860

Source: HUD CHAS Table for 2016-2020, released September 2023

Table 9 below shows that approximately 6,355 households or 12.3% of the City’s households fall into Extremely Low Income. These households are some of the most unstable and vulnerable to homelessness.

Table 9
City of Moreno Valley
Moreno Valley Income Groups

CITY OF MORENO VALLEY						
Income Group	Owner	Percent	Renter	Percent	All Households	Percent
Extremely Low Income	2,025	6.3%	4,330	22.2%	6,355	12.3%
Very Low Income	2,720	8.5%	3,425	17.6%	6,145	11.9%
Low Income	6,025	18.8%	4,785	24.5%	10,810	21.0%
Moderate Income	4,105	12.8%	2,055	10.5%	6,160	12.0%
Above Moderate Income	17,175	53.6%	4,900	25.1%	22,075	42.8%
Total	32,050	100.0%	19,495	100.0%	51,545	100.0%

Source: HUD CHAS Table for 2016-2020, released September 2023

Seniors at Greatest Risk of Instability

A sub-population in this QP at greatest risk of instability are the City’s seniors (62+ years in age), many of whom are living on fixed incomes such as pensions or social security and are at the Extremely Low Income (ELI) level. Over the five year period July 2019 to July 2023, average rental costs in Riverside County were allowed to increase by law as much as 42.7%. This increase is 22.5% more than the 20.3% COLA increase in social security benefits over the same period. The gap in the affordability of rental housing has potentially put all ELI seniors at risk of homelessness. Many of these ELI seniors are unable to go back to work to offset this rental inflation and rely solely on social security, social services, family assistance and/or must apply for Section 8 housing vouchers to maintain permanent housing.

According to 2022 U.S. census data posted on the City’s website, there are approximately 20,000 seniors age 62+ residing in the City. If approximately 12.3% of these persons are ELI based on Table 9 and household size averages 1.5 persons, there would be approximately 1,640 senior ELI households in the City that are potentially unstable due to the high rental rates.

Currently on the City website, there are 1,235 affordable low-income units potentially available for Section 8 vouchers. There are only 67 units located in Moreno Valley qualify for Section 8 rental assistance as listed on the HACR website, including the Mountain View Apartments (50 units), the Courtyard at Cottonwood (16 units) and 1 HACR owned townhome at Moreno Valley Villa (Source: <https://harivco.org/available-units>). This leaves a gap of 405 affordable low-income units (1,640 needed less 1,235 available) for senior ELI households. The Section 8 affordable low-income unit gap is even greater at 1,168 (1,235 units total less 67 exiting Section

8 qualified). The HACR staff has also reported a gap of 876 senior households in the City awaiting a Section 8 housing voucher.

Describe the unmet housing and service needs of qualifying populations:

The lack of affordable low-income housing in the City affects all four QPs and hinders current efforts by the City and the City’s subgrantees to find affordable low-income permanent housing for individuals and families. Legal services to assist families with issues relating to housing and personal safety issues were also a specified need during the consultation process.

Table 10 below shows a summary of the housing gaps by Qualifying Population (QP) in the City as identified in the prior analysis.

**Table 10
City of Moreno Valley
Affordable Low Income Housing Gap by QP**

CITY OF MORENO VALLEY			
QP	Units Needed	Avaiable Units	Gap
1 - Homeless	101	2	99
2 - At-Risk of Homelessness	N/A	N/A	N/A
3 - Domestic Violence	21	0	21
4 - Instability-50% Rent ⁽¹⁾	3,460	1,235	2225
Total	3,582	1237	2345
(1) Senior only available units are 332			

Homeless as defined in 24 CFR 91.5:

This Allocation Plan aims to reduce the 101 sheltered and unsheltered homeless persons in the City needing permanent housing by allowing these QP1 households to apply for permanent affordable low-income housing in the proposed new construction described in **Use of HOME-ARP Funding** below. It also aims to provide unmet needs for legal services including those listed in **Use of HOME-ARP Funding** below.

At Risk of Homelessness as defined in 24 CFR 91.5:

This Allocation Plan aims to allow QP2 households to apply for more affordable low-income housing in the proposed new construction described in **Use of HOME-ARP Funding** below. This Allocation Plan also aims to provide unmet needs for legal services including those listed in **Use of HOME-ARP Funding** below.

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

This Allocation Plan aims to allow QP3 households to apply for permanent affordable low-income housing in the proposed new construction described in **Use of HOME-ARP Funding** below. This Allocation Plan also aims to provide unmet needs for legal services including those listed in **Use of HOME-ARP Funding** below.

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:

This Allocation Plan aims to allow QP4 households to apply for more affordable low-income housing in the proposed new construction described in **Use of HOME-ARP Funding** below. This Allocation Plan also aims to provide unmet needs for legal services including those listed in **Use of HOME-ARP Funding** below.

The most significant housing gap affecting the City is with QP4 and with a 405 unit gap for the sub-population of senior ELI households including the homeless. These senior ELI households have minimal or fixed incomes and have been most impacted by rising rental rates and overall inflation experienced since the Covid-19 pandemic in 2020.

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

Based on the consultations in Table 1 and subsequent evaluation in this Allocation Plan, the City is experiencing gaps in emergency shelters, transitional housing and affordable low-income permanent housing. Funding is also lacking for supportive services such as drug rehabilitation, mental and medical care and legal services. This Allocation Plan aims to address specifically the gap in affordable low-income housing and legal services.

The City lacks sufficient affordable low-income housing units compared to the needs of the QPs within the City. Currently residents needing assistance are limited to waiting lists, due to the lack of affordable low-income units available within the City. The gap in affordable low-income housing is approximately 2,345 units as shown in Table 10. There is no current solution to the gap apart from construction of affordable low-income housing. Legal services gaps can be specific to those relating to barriers to permanent housing and protection from domestic related violence.

Identify priority needs for qualifying populations:

Affordable low-income housing is the most urgent need for the City followed by 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:

The level of need for affordable low-income housing units was estimated using various City, County and federal sources. The total number of households identified as below 30% AMI or 30-50% AMI paying more than 50% of their income towards rent, less currently available affordable low-income units is shown in Table 8. Lack of funding was also identified as a hinderance to delivery of supportive services to the QPs.

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:

For the proposed activities described in **Use of HOME -ARP Funding** below, the City will engage in the following selection processes.

Legal Services – the City will partner with a legal services aid firm to deliver these services. . The firm selected will best mitigate the barriers to permanent housing as described in **Use of HOME-ARP Funding** below.

Rental Housing - the City is proposing an \$18 million thirty-five (35) unit low-mod income senior rental project in the City that will be completed by the end of 2024. The development will partner with the Riverside County Housing Authority to provide Project Based Vouchers to assist in maintaining monthly rent payments by the tenants at HUD HOME-ARP limits while maintaining the financial feasibility of the project.

Describe whether the PJ will administer eligible activities directly:

The legal firm selected by the City will administer the legal services activities. The builder/developer will oversee the rental housing activity. A contracted grant administrator will assist City staff in administering the accounting and required HOME-ARP reporting.

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:

No HOME-ARP administration funds have been paid to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP Allocation Plan.

Uses 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:

As shown in Table 11 below, the City intends to provide supportive services and to develop affordable low-income rental housing that was identified as two of the most immediate needs of the four QPs.

**Table 11
City of Moreno Valley
HOME-ARP Funding Allocation**

HOME-ARP Funding Allocations			
Activity	Funding Amount	Percent of Allocation	Statutory Limit
Supportive Services	\$110,000	5%	
Non-congregate Shelter	\$0	0%	
Tenant-based Rental Assistance	\$0	0%	
Develop Rental Housing	\$2,000,000	82%	
Non-profit Operating	\$0	0%	5%
Non-profit Capacity Building	\$0	0%	5%
Administration and Planning	\$317,401	13%	15%
Total HOME-ARP Allocation	\$2,427,401		

Supportive Services

The City has identified the need for additional supportive services to QP’s within the City, specifically legal advocacy and representation for legal issues acting as barriers to permanent housing, provision and safety, including those listed below. The City intends to allocate up to \$110,000 (5%) of the HOME-ARP funds to local attorneys and/or non-profits to provide all QP’s with legal services. Legal services allowable under *CPD-21-10 Requirements of the Use of Funds in the HOME-American Rescue Plan Program* may include, but are not limited to:

- Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with a qualifying individual or family's ability to obtain and retain housing.
- Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other legal remedies for victims of domestic violence, dating violence, sexual assault, human trafficking, and stalking;

appeal of veterans and public benefit claim denials; landlord-tenant disputes; and the resolution of outstanding criminal warrants; landlord/tenant matters, provided that the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.

Development of Rental Housing

The City has identified the need for additional affordable low-income housing within the City as a top priority, particularly to unsheltered persons and the ELI households cited above. The City intends to allocate up to \$2,000,000 (82%) of the HOME-ARP funds to partially finance the construction of thirty-five (35) affordable low-income housing units available to all QP's qualifying as seniors aged 62 and over. A minimum of twenty-five (25 or 71%) of the units will be made available to these QP's for a minimum of fifteen (15) years. Rents for these HOME-ARP funded units will not exceed 30% of the adjusted income of a household whose annual income is less than 30% of the Riverside County average median income (<30% AMI) in effect at the time of application. In order to make the project financially viable, the development will utilize Section 8 Project Based Vouchers from HACR and senior housing tax credits. The County's CES will provide referrals from their waiting list, which will be prioritized as described below under **Preference and Prioritization**.

Administration:

The City intends to allocate up to \$317,401 (13%) of the HOME-ARP funds to program management, coordination, legal, monitoring, and evaluation of the HOME-ARP activities. Costs may include reasonable salaries and wages, travel, administration under a third party and other cost allowable under *CPD 21-10 Requirements of the Use of Funds in the HOME-American Rescue Plan Program*.

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:

Through the consultation and public participation described above, the City was able to determine the major gaps in housing and services to QP's related to availability of affordable low-income housing and supportive services. As such, the City intends to build additional affordable low-income rental housing and provide supportive legal services to the QP's as previously described above. The City will partner with the Riverside County Housing Authorities Continuum of Care, Coordinated Entry System and Section 8 Voucher program to assist with screening and recommending rental applicants that meet the HOME-ARP regulations and the

preferences discussed below. The City will utilize a private firm or non-profit organization, such as Riverside Legal Aid, to screen and deliver legal services to the QP's.

HOME-ARP Production Housing Goals

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

The City intends to have constructed an additional thirty-five (35) units of affordable low-income senior housing with its allocation of HOME-ARP funds as previously described in **Use of HOME-ARP Funding**. It is estimated that a minimum of 25 units (71% of available units) will be reserved for the HOME-ARP defined QP's.

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

The City hopes that the additional affordable low-income senior rental housing will provide permanent housing to a minimum of 25 extremely low-mod QP1-homeless persons in the City. If additional units are available, they will be made available to the QP2-QP4 persons based on the stated **Preferences and Prioritization** below.

Preferences & Prioritization

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). With this understanding and with identification of those QPs most in need at this time, the City has established preferences for QP applicants.

Legal Services Preferences and Priorities

The City will give preference for legal services to any QP with extremely low income (<30% AMI). Legal services will be provided on a first approved, first served basis.

Rental Housing Preferences and Priorities

The City will give preference for the twenty-five (25) senior rental housing units allocated to each QP based on priorities in Table 12 below. Further preference in each QP groups will be given to the sub-population of qualified senior applicants ages 62 and older. The City is consulting with and anticipating approval of this preference with HUD's Fair Housing Equal Opportunity Division.

Table 12
City of Moreno Valley
HOME-ARP PREFERENCES AND PRIORITIES

HOME-ARP Rental Housing				
Qualifying Populations	Description	Order of Preference	Method of Prioritization	Income Limitation
QP1	Homeless	1	CES referred	<30% AMI
QP2	At-Risk	2	First Applied	<30% AMI
QP3	DVs	3	First Applied	<30% AMI
QP4	Other	4	Rent Over 50%	<30% AMI

QP1 applicants referred to the City by the Riverside County Coordinated Entry System (CES) will be given priority. If all 25 units are not completely occupied by QP1 applicants, then the City will accept QP2-QP3 applicants in the Order of Preference listed above on a first approved basis as long as units are available. QP4 applicants will be given priority based on those paying more than 50% of their annual income in their current rent. All QP’s considered for rental housing will be extremely low-mod income households (<30% AMI for Riverside County as published by HUD and effective at time of application).

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 preferences and priorities established will first address the most identifiable need for affordable low-income housing for the QP1-homeless and Q4-At greatest risk of housing instability with further preference in both QP’s to seniors 62+ years of age and have <30% AMI. Persons/households that do not qualify for the preferences for rental housing or legal services will be referred to partnering non-profits such including but not limited to Riverside Legal Aid, Fair Housing Counseling of the County of Riverside, Inland So Cal United Way.

Referral Methods

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):

For Rental Housing, the City intends to utilize the Riverside County CES referrals for the QP1 - Homeless rental housing applicants for available units. The City may receive referrals from agencies and non-profits serving QP2-QP4 individuals when rental units are not fully occupied by QP1 referrals.

For Legal Services, the City will accept referrals from any other agencies or non-profits providing legal service referrals to the four QP's.

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 CES will only be screening and referring QP1-Homeless applicants to the proposed rental housing project. Persons in QP2-QP4 that are seniors and meet the ELI income requirements will be eligible for referral by other agencies and non-profits such including but not limited to Riverside Legal Aid, Fair Housing Counseling of the County of Riverside, Inland So Cal United Way. . The City will work with these agencies and non-profits to generate outreach materials and social media posts targeting all QPs.

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 City will instruct the Riverside County CES to prioritize referrals based on applicants 1) Qualifying as QP1 (Homeless) under Home ARP; 2) age 62 and over 3) at <30% AMI for Riverside County effective at the time of application and 3) on a first approved basis.

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 City will accept referrals from other stakeholder agencies for QP2- QP4 applicants. These agencies and non-profits referring QP2-QP4 applicants will be instructed to apply the preferences listed in Table 12 above.

Limitations

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

The City intends to limit rental housing to any QP applicant qualifying as elderly/senior age 62 and over, and an ELI household (<30% AMI for Riverside County effective at the time of application).

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in

the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The City's needs analysis has highlighted its ELI senior population as the most vulnerable to housing instability and risk of homelessness due to their limited ability to work and fixed income sources that do not keep pace with escalating rental rates. The lack of affordable low-income senior housing eligible for Section 8 vouchers is also a factor in this limitation.

The City intends to limit legal services to households with incomes at <30% AMI for Riverside County effective at the time of application in order to provide services to the most vulnerable populations within the City in need of housing and protection from violence matters.

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

For unmet needs and gaps in benefits and services of QP's not included in the limitations listed above, the City will refer QP's to one or more of the support organizations listed in Table 1 on page 4, including but not limited to Riverside Legal Aid, Fair Housing Counseling of the County of Riverside, Inland So Cal United Way.

DRAFT