HOME-ARP Allocation Plan

HOME Investment Partnerships - American Rescue Plan Program Allocation Plan is a Substantial Amendment to the Program Year 2021-22 United States Department of Housing and Urban Development Annual Action Plan

SAN BERNARDINO COUNTY, CALIFORNIA

Community Development and Housing Department

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INTRODUCTION

The American Rescue Plan (ARP) was signed into law on March 11, 2021 to provide federal funding to relieve the continued impact of the COVID-19 pandemic on the economy, public health, and state and local governments. As part of the American Rescue Plan (ARP), the U.S. Department of Housing and Urban Development (HUD) is providing $5 billion in funding to cities and counties across the country that participate in HUD's Home Investment Partnerships (HOME) entitlement grant program. This funding will assist people who are homeless or at risk of homelessness and other vulnerable populations through housing, rental assistance, supportive services, and non-congregate shelter, with the goal of reducing homelessness and increasing housing stability. Grantees are required by HUD to develop and submit plans outlining their housing and homeless needs and their anticipated uses of HOME-ARP funding.

San Bernadino County (County) is scheduled to receive $12.7 million in HOME-ARP funds and has engaged in a consultation and public participation process to develop this HOME-ARP Allocation Plan. In this Plan, the County describes how it intends to distribute HOME-ARP funds locally. In accordance with federal regulations and the guidelines contained in the Community Planning and Development Notice CPD-21-10, the Plan will be submitted to HUD as a substantial amendment to the County's 2021-22 Annual Action Plan.

San Bernardino County is classified by HUD as HOME Consortium because it includes several cities which choose to cooperate with the County and receive HOME and other grant funds through the County. Cities that are members of the County Consortium for participation in the County's HOME program include:

1. Adelanto
2. Barstow
3. Big Bear Lake
4. Colton
5. Grand Terrace
6. Highland
7. Loma Linda
8. Montclair
9. Needles
10. Redlands
11. Twentynine Palms
12. Yucaipa
13. Town of Yucca Valley
14. Chino Hills
15. Rancho Cucamonga

Definitions

This section includes definitions of several of the terms used related to HUD's HOME-ARP program and, more generally, housing and services for individuals and families experiencing homelessness.

Qualifying Populations (Definitions based on HUD's Community Planning and Development Notice CPD-21-10)

- **Qualifying Populations:** The American Rescue Act defines qualifying individuals or families as those that are: (1) homeless, (2) at risk of homelessness, (3) fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; (4) part of other populations where providing assistance would prevent homelessness or serve those with the greatest risk of housing

instability; and (5) veterans and families that include a veteran family member that meet the criteria in items 1 through 4.

- **Homeless**: (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, or (2) an individual or family who will lose their primary nighttime residence within 14 days and has not identified a subsequent residence, or (3) unaccompanied youth under the age of 25.

- **At Risk of Homelessness:** An individual or family with an annual income under 30% of median family income (as determined by HUD) without sufficient resources or support networks who has moved two or more times in the last 60 days due to economic reasons, is living in someone else's home due to economic reasons, has been notified that they must leave their home within 21 days, lives in a hotel or motel, lives in overcrowded conditions, is leaving a publicly funded institution (e.g., healthcare facilities, mental health facilities, foster care, correction program) or has other characteristics of housing instability.

- **Fleeting, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**: Any individual or family fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, including cases where an individual or family believes there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions within their primary nighttime residence.

- **Families Requiring Services or Housing Assistance to Prevent Homelessness:** Households who were previously homeless and currently housed due to temporary or emergency assistance, such as financial assistance or temporary rental assistance, and need additional housing assistance or services to avoid a return to homelessness.

- **Households with Greatest Risk of Housing Instability:** (1) A household with an annual income at or below 30% of area median income paying more than 50% of monthly household income towards housing costs, or (2) a household with an income at or below 50% of the area median income who is at risk of homelessness.

Housing Assistance Types (Definitions based on "Homelessness in San Bernardino County Data Trends and Recommendations" prepared by the Hub for Urban Initiatives and Office of Homeless Services and HUD's HOME-ARP Non-Congregate Shelter Fact Sheet)

- **Emergency Shelter (ES):** Any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless.

- **Permanent Housing (PH):** Community-based housing without a designated length of stay in which formerly homeless individuals and families live as independently as possible. Typically, PH refers collectively to both permanent supportive housing and rapid rehousing.

- **Permanent Supportive Housing (PSH):** A means of reintegrating chronically homeless and other highly vulnerable homeless families and individuals with psychiatric disabilities or chronic health

challenges into the community by addressing their basic needs for housing and providing ongoing support.

- **Rapid Rehousing (RRH):** An intervention that rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services.

- **Transitional Housing (TH):** A project that has as its purpose facilitating the movement of homeless individuals and families to permanent housing within a reasonable amount of time (usually 24 months). Transitional housing includes housing primarily designed to serve deinstitutionalized homeless individuals and other homeless individuals with mental or physical disabilities and homeless families with children.

- **Non-Congregate Shelter (NCS):** Shelter that provides private units or rooms as temporary shelter to individuals and families and does not require occupants to sign a lease or occupancy agreement. Examples include hotels, motels, dormitories, or other forms of non-congregate shelter.

- **Tenant-Based Rental Assistance (TBRA):** Rental subsidies that help individual households afford housing costs such as rent and security deposits. The most common type of TBRA program provides payments to make up the difference between the amount a households can afford to pay for housing and local rent standards.

CONSULTATION

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

To obtain stakeholder input for San Bernardino County's HOME-ARP Allocation Plan, the County conducted outreach to a variety of agencies and service providers who serve HOME-ARP qualifying populations to identify needs related to homelessness. Input from these providers was also used to determine how the County will spend its HOME-ARP funds and potential opportunities for collaboration.

The stakeholder consultation process built on the County's Homeless Strategic Action Plan adopted in 2022. The Strategic Action Plan included input from over 500 community stakeholders, including youth, veterans, older adults and persons with disabilities, formerly homeless individuals, healthcare entities, faith and community-based organizations, cities, and housing developers. It identified three interrelated goals of (1) housing the most at-risk; (2) increasing shelter capacity; and (3) making system improvements to enhance coordination. The Homeless Strategic Action Plan contemplated the use of HOME-ARP funds for administrative activities, permanent supportive and service-enriched housing, and rental assistance. Through the HOME-ARP Allocation Plan consultation process, these were further explored as possible uses of HOME-ARP funding.

The stakeholder engagement process included the San Bernardino County Homeless Partnership, which is the Continuum of Care (CoC) that covers the entire grantee geography and the only CoC within San Bernardino County, and the Housing Authority of the County of San Bernardino and the Housing Authority of the City of Needles, which are the only two housing authorities operating within the grantee geography.

The HOME-ARP Allocation Plan consultation process included the following meetings and email outreach:

San Bernardino County Homeless Partnership's Interagency Council on Homeless (ICH)

County staff attended a virtual meeting of the San Bernardino County Homeless Partnership's Interagency Council on Homelessness (ICH) on October 26, 2022. The Homeless Partnership serves as the County's Continuum of Care. The meeting had 66 attendees representing a wide variety of agencies and providers. The meeting included an overview of the HOME-ARP program and eligible uses of funds. Following the presentation, attendees were queried regarding:

- Proposed uses of HOME-ARP funds for Permanent Supportive Housing, Service-Enriched Housing, Rental Assistance, and Administrative Activities, as outlined in the County's Homeless Strategic Action Plan;
- Potential targeting of HOME-ARP funds to specific qualifying populations or subgroups; and
- Potential collaboration opportunities to ensure success of HOME-ARP projects.

Please see the appendix for a list of agencies that attended the ICH meeting.

San Bernardino County Stakeholder Meeting

The County held a virtual stakeholder meeting on November 17, 2022, with about 14 attendees. The meeting included an overview of the HOME-ARP program and eligible uses of funds, followed by

discussion of proposed uses of HOME-ARP funds, potential targeting to specific qualifying populations, and potential collaboration opportunities. Please see the appendix for a list of agencies that were invited to attend the stakeholder meeting.

Follow-Up Email Questionnaire

Following both meetings, attendees were invited to provide additional input by email. The County received two follow-up emails after the ICH meeting, from Josh Candelaria with Viewpoint Advocacy and Wendell Wilson with the Mountain Homeless Provider Network. Both individuals wrote regarding additional ways to engage with the project and were invited to the November 17, 2022 stakeholder meeting.

The County received four email responses following the November 17 stakeholder meeting. They included:

- Additional input about rural homeless needs from the City of Twentynine Palms;
- Written input from the Inland Fair Housing and Mediation Board (IFHMB);
- Written input from the Housing Authority of the County of San Bernardino; and
- A letter co-signed by National Community Renaissance and Hope through Housing Foundation.

Outreach Methods

Stakeholders were invited to participate in the November 17 stakeholder meeting via email invitations sent on November 8 and November 10, 2022. The invitation included instructions on how to request accommodations if necessary. The invitation also included instructions on how to join either via Zoom on a computer or by phone. Following the completion of the stakeholder meeting on November 17, participants received a follow-up email requesting that they share any additional thoughts via email by November 28, 2022. Additional outreach to key stakeholders that had not yet provided input through a meeting or in writing was conducted through email and via phone through February 2023.

Agencies Consulted and Input Received

The table below lists all organizations who either attended a meeting or provided input via email, along with a summary of the input they shared.

TABLE 1 – AGENCIES CONSULTED

Agency/Org Consulted	Type of Agency/Org	Qualifying Population(s) Served	Method(s) of Consultation	Date(s) of Consultation	Feedback
San Bernardino County Homeless Partnership (SBCHP)	Continuum of Care (see Appendix for a list of participating organizations)	Homeless At-risk of Homelessness Survivors of Domestic Violence Veterans Other Populations (unstably housed)	ICH Meeting Conference Call	10/26/2022 01/17/2023	The County has a very large need for permanent supportive housing, but this area is currently very underfunded. Permanent supportive housing, service-enriched housing, and rental assistance would be good uses of HOME-ARP funds. Additionally, too many private landlords practice income discrimination and refuse to accept voucher income, creating an even larger need for city or council controlled permanent supportive housing. Note: The Homeless Partnership serves as the governing body for the Continuum of Care. Three SBCHP staff members participated in the meeting, along with the chairpersons from each of SBCHP's five Regional Steering Committees. SBCHP staff provided additional input regarding the use of HOME-ARP funds via conference call with County staff on January 17, 2023.
Mountain Regional Homeless Provider Network	Homeless Service Providers	Homeless At-risk of Homelessness Survivors of Domestic Violence Veterans Other Populations (unstably housed)	ICH Meeting Written Input Submitted by Email Stakeholder Meeting	10/26/2022 (ICH Meeting & Email) 11/17/2022	This area's biggest need is for more affordable rental housing, especially for elderly, disabled, and displaced residents. AirBNB has made this more difficult, and many people are forced to go to hotels. Additionally, landlords are refusing vouchers. A solution to this could be non-profits owning their own properties. Shelter-wise, cold weather shelters in the mountains are high- priority and often overlooked. This is an area where motels (as a form on non-congregate shelter) could be useful. Many grants require a lot of finished pre-development work for their application process, which is cost prohibitive for small areas and

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					nonprofits. Pre-development cost assistance is a need.
					Funds are sometimes distributed based on the number of chronically homeless people identified in the PIT count, but there are more non-chronically homeless people who need assistance too and aren't being accounted for with a focus on chronically homeless people.
					The County Inroads Program could help with a MAP-style program like that referenced by the City of Montclair.
					Region steering committees could be helpful in deciding fund disbursal; each region could get a set minimum amount and then steering committees could have input for the extra. There is some existing infrastructure for communication, but regions and organizations also have to compete for funding which can hinder collaboration.
West Valley Regional Homeless Provider Network	Homeless Service Providers	Homeless At-risk of Homelessness Survivors of Domestic Violence Veterans Other Populations (unstably housed)	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.

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Central Valley Regional Homeless Provider Network	Homeless Service Providers	Homeless At-risk of Homelessness Survivors of Domestic Violence Veterans Other Populations (unstably housed)	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Morongo Basin Aligning Resources Challenging Homelessness (ARCH)	Homeless Service Providers	Homeless At-risk of Homelessness Survivors of Domestic Violence Veterans Other Populations (unstably housed)	ICH meeting	10/26/2022	Short-term rental housing has cost us affordable housing.
Brilliant Corners	Homeless Housing and Service Provider	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Mercy House	Homeless Housing and Service Provider	Homeless At-risk of Homelessness	ICH meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.

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		Other Populations (unstably housed)			
Step Up on Second	Homeless Housing and Service Provider / Low-Income Service Provider	Homeless At-risk of Homelessness Veterans Other Populations (unstably housed)	ICH meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Victor Valley Rescue Mission	Homeless Housing and Service Provider	Homeless At-risk of Homelessness Other Populations (unstably housed, people with substance use disorders)	ICH meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Inland Valley Hope Partners	Homeless Housing and Service Provider	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Knock Knock Angels	Homeless Housing and Service Provider	Homeless At-risk of Homelessness	ICH meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.

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		Survivors of Domestic Violence Other Populations (unstably housed)			
Lutheran Social Services of Southern California	Homeless Housing and Service Provider	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Re-Entry Clinical Housing and Supportive Services	Homeless Housing and Service Provider	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Time for Change Foundation	Homeless Housing and Service Provider	Homeless At-risk of Homelessness Survivors of Domestic Violence Other Populations (unstably housed)	ICH meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Victor Valley Family Resource Center	Homeless Housing and Service Provider	Homeless Other Populations (unstably housed)	ICH meeting	10/26/2022	Agency representatives attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.

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Women Who Matter Too	Homeless Housing and Service Provider	Homeless Other Populations (unstably housed)	ICH meeting	10/26/2022	Agency representatives attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Knowledge and Education for Your Success (KEYS)	Homeless Service Provider	Homeless At-risk of Homelessness	ICH Meeting Stakeholder Meeting	10/26/2022 11/17/2022	Agency representatives did not provide specific comments at the meetings; Contacted by email for any follow-up input on 11/17; No response received.
First Step Staffing	Homeless Service Provider / Work-force Development	Homeless Other Populations (unstably housed)	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Foothill AIDS Project	Homeless Service Provider	Homeless At-risk of Homelessness Other Populations (people living with HIV/AIDS who are unstably housed)	ICH meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Street Life Project	Homeless Service Provider	Homeless	Stakeholder Meeting	11/17/2022	Agency representative did not provide specific comments at the meeting; Contacted by email for any follow-up input on 11/17; No response received.
Desert Manna	Homeless Housing and Service Provider / Low-Income Service Provider	Homeless At-risk of Homelessness	ICH meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.

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		Other Populations (unstably housed)			
New Hope Village	Affordable Housing & Homeless Service Provider	Homeless	Stakeholder Meeting	11/17/2022	Agency representative did not provide specific comments at the meeting; Contacted by email for any follow-up input on 11/17; No response received.
Community Action Partnership of San Bernardino County	Homeless Service Provider / Low-Income Service Provider	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
National Community Renaissance	Affordable & Special Needs Housing Provider	At-risk of Homelessness Other Populations (unstably housed)	Written Input Submitted by Email	12/7/2022	The County's allocation of HOME-ARP funding is an exciting opportunity to address the housing and homelessness crisis in San Bernardino County by 1) expanding access to housing through investment in new units of affordable housing, including permanent supportive housing, 2) funding supportive services for residents of permanent supportive and other affordable housing communities, and 3) keeping residents housed by providing emergency rental assistance to households at risk of eviction. HOME-ARP represents an important leveraging tool to catalyze the development of more units of affordable housing in the County. Throughout the County, proposed affordable housing communities stand to bring in tens of millions of dollars in outside investment to the County. However, funding sources to make these projects possible are highly competitive and oversubscribed. The

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					County's direct investment in new affordable housing and permanent supportive housing communities boosts a project's competitiveness for and ability to secure these scarce resources. Additionally, HOME-ARP funding can serve to promote best practice service for residents of affordable housing communities in San Bernardino County. Quality supportive services, like those focusing on resident health outcomes, economic mobility, workforce training, and financial counseling are especially critical in permanent supportive housing communities. These services are expensive to operate and few funding sources are dedicated to the provision of services in affordable housing communities. HOME-ARP funding can boost resident outcomes by expanding access to quality supportive services in the County's affordable housing and permanent supportive housing communities. Finally, the County's allocation of HOME-ARP funding represents an opportunity for keeping San Bernardino County residents housed in the short term. National CORE and HTHF support the use of a portion of HOME-ARP funding for the continuation of emergency rental assistance for San Bernardino County residents, a proven prevention strategy for ensuring housing stability for those on the brink of experiencing homelessness.
Hope through Housing Foundation	Private Agency – Low-Income Service Provider	At-risk of Homelessness Other Populations (unstably housed)	Written Input Submitted by Email	12/7/2022	See above; organization provided comment through a dual letter with the National Community Renaissance.

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Family Service Association of Redlands	Private Agency – Low-Income Service Provider	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting Stakeholder Meeting	10/26/2022 11/17/2022	Service providers need more clarity and instructional access to the application and Request for Proposal (RFP) process for HOME-ARP funding.
Desert Sanctuary Haley House	Domestic Violence Service Provider	Survivors of Domestic Violence	Stakeholder Meeting	11/17/2022	HOME-ARP funds should target domestic violence survivors who frequently need a lot of assistance getting back on their feet.
Domestic Violence Education and Services (DOVES)	Domestic Violence Service Provider	Survivors of Domestic Violence	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
House of Ruth	Domestic Violence Service Provider	Survivors of Domestic Violence	ICH Meeting	10/26/2022	Agency representatives attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
San Bernardino County Veterans Affairs	Public Agency – Veterans' Groups	Veterans and Families that Include a Veteran	ICH Meeting Written Input Submitted by Email	10/26/2022 1/27/2023	The County's VA Department's primary focus is on assisting Veterans with the Compensation and Pension (C&P) claims with the Federal Department of Veterans Affairs. Regarding issues of housing and homelessness, we refer Veterans to internal and external resources for assistance. Our County Veterans Service Officer hear complaints and concerns from Veterans related to housing, including: • Challenges getting in contact with someone with the HUD-VASH program; • Addiction/sobriety as barriers to being able to participate in or be eligible for programs and

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					corresponding difficulty accessing services to support sober living; • Programs that are perceived to be too strict with rules; • Locations that participate in the HUD-VASH program may be in areas perceived to be "dangerous" (higher crime, etc.) and • Lack of transportation to resources.
Housing Authority of the County of San Bernardino (HACSB)	Public Housing Authority	At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting Written Input Submitted by Email	10/26/2022 1/12/2023	Moderate income housing (workforce housing) is much needed. HOME funds can play an essential part in creating mixed income housing to help with this need. The need for housing for low to moderate income families (80% to 100% AMI) remains a gap due to rising rents and other inflationary conditions. Furthermore, the capital funding to develop more affordable housing remains a gap from the Housing Authority's point of view. HUD does not provide capital funds for the creation of additional housing. As such HACSB has to rely on partnerships to meet gaps in the funding stack to create more affordable housing. The county should target HOME-ARP funds towards low to moderate income families via the creation of mixed income developments. We understand that HOME funds have AMI restrictions, however the capital funding can be utilized with set asides for applicable AMI units while also creating moderate income housing. Collaboration with entities that can provide capital funding and operating subsidies in the creation of

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					affordable and workforce housing developments are essential to the success of HOME-ARP projects. The Housing Authority has a long-standing partnership with the County of creating affordable housing using HOME funds. This partnership has created hundreds of affordable housing units in our County. HACSB would be glad to further discuss partnerships with the County.
Housing Authority of the City of Needles	Public Housing Authority	At-risk of Homelessness Other Populations (unstably housed)	Telephone Interview	02/27/2023	Permanent affordable housing would be a great use of HOME-ARP funds. The demand for affordable housing far outweighs the supply. Housing choice voucher holders often have difficulty finding a rental unit due to a very low supply of housing affordable with the payment standard. For public housing units in Needles, the wait list is long and turnover among public housing units is very low, particularly one-bedroom units. Non-congregate shelter would also be a good use of HOME-ARP funds. There is very little shelter space in the Needles area and they seem to stay well-occupied/busy.
San Bernardino County Office of Homeless Services	Public Agency – Homeless Service Provider	Homeless At-risk of Homelessness Survivors of Domestic Violence Veterans Other Populations (unstably housed)	ICH Meeting	10/26/2022	There is a large need for permanent affordable housing in San Bernardino County, including housing with services.

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San Bernardino County Community Revitalization	Public Agency – Homeless Service Provider	Homeless At-risk of Homelessness Survivors of Domestic Violence Veterans Other Populations (unstably housed)	ICH Meeting	10/26/2022	The San Bernardino County Office of Homeless Services is located under the County's Community Revitalization department. Community Revitalization staff members attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
San Bernardino County Department of Aging and Adult Services	Public Agency – Serving Seniors and People with Disabilities	Homeless At-risk of Homelessness Other Populations (seniors who are unstably housed)	ICH Meeting	10/26/2022	A staff member attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
San Bernardino County Department of Behavioral Health	Public Agency – Serving People with Disabilities	Other Populations (people with disabilities and/or substance use disorders)	ICH Meeting	10/26/2022	Staff members attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Molina Healthcare	Private Agency – Healthcare Agency	Homeless At-risk of Homelessness Other Populations (unstably housed, seniors, people with disabilities)	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.

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San Bernardino County Superintendent of Schools	Public Agency – Serving Students and Families	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Victor Elementary School District	Public Agency – Serving Students and Families	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
YouthBuild Inland Empire	Private Agency – Serving Students	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
San Bernardino County Probation Department	Public Agency – Law Enforcement	Other Populations (unstably housed)	ICH Meeting	10/26/2022	A staff member attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
San Bernardino County Sheriff's Department	Public Agency – Law Enforcement	Other Populations (unstably housed)	ICH Meeting	10/26/2022	A staff member attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
Inland Fair Housing and Mediation Board (IFHMB)	Fair Housing / Civil Rights Agency	Other Populations (unstably housed)	Written Input Submitted by Email	12/6/2022	Affordable housing development is needed due to the lack of affordable housing in San Bernardino County. Permanent supportive housing would help address the need for affordable housing. There is a lack of affordable housing for persons with

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					disabilities (both physical and mental). Accessibility is important in all housing development and especially in permanent supportive housing. The locations for new developments should take into account fair housing considerations and requirements, including proximity to community resources (such as hospitals, libraries, workplaces, etc.).
					HOME-ARP funding should also target the following specific populations: persons experiencing homelessness or housing instability; persons with disabilities, especially those at risk of institutionalization; persons living in impoverished areas or experiencing persistent poverty; and persons who are immigrants and/or have limited English proficiency.
					Collaboration with local non-profits can help to ensure success in this area.
City of Barstow	Public Agency – Municipality	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting Stakeholder Meeting	10/26/2022 11/17/2022	There should be more investigation into unusual or alternative forms of housing, such as converted storage units. There is a lack of funding or education on how to receive funding for smaller rural cities who want to expand homeless assistance programs. Many nonprofits are not interested in or able to expand to these areas, so cities have to form their own programs. Collaboration between organizations can be helpful but requiring it for funding can be a problem – it should be voluntary.

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City of Colton	Public Agency – Municipality	Homeless At-risk of Homelessness Other Populations (unstably housed)	Stakeholder Meeting	11/17/2022	Agency representative did not provide specific comments at the meeting; Contacted by email for any follow-up input on 11/17; No response received.
City of Montclair	Public Agency – Municipality	Homeless At-risk of Homelessness Other Populations (unstably housed)	Stakeholder Meeting	11/17/2022	Non-congregate shelter is not ideal for people with substance abuse issues. Mental health assistance and drug rehab should be mandatory, not voluntary, for people receiving homeless services. Permanent supportive housing is not a good solution for chronic homelessness. In general – there should be more varied types of shelter available. There is also a need for more supportive services for people benefiting from permanent supportive housing. The MAP program could be a good partnership resource or example for service distribution, especially for homeless individuals needing medical addiction assistance. There is a potential opportunity for collaboration with local businesses to incentivize hiring people exiting homelessness.
City of Redlands	Public Agency – Municipality	Homeless At-risk of Homelessness Other Populations (unstably housed)	Stakeholder Meeting	11/17/2022	Agency representative did not provide specific comments at the meeting; Contacted by email for any follow-up input on 11/17; No response received.

Agency/Org Consulted	Type of Agency/Org	Qualifying Population(s) Served	Method(s) of Consultation	Date(s) of Consultation	Feedback
City of Twentynine Palms	Public Agency – Municipality	Homeless At-risk of Homelessness Other Populations (unstably housed)	Stakeholder Meeting Written Input Submitted by Email	11/17/2022 11/21/2022	HOME-ARP funding should target assistance for disadvantaged or low-income communities in addition to homelessness; they are a growing concern in the area and do not receive the same level of resources as homeless assistance programs.
City of Ontario	Public Agency – Municipality	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting	10/26/2022	A City representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
City of Rancho Cucamonga	Public Agency – Municipality	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting	10/26/2022	A City representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
City of San Bernardino	Public Agency – Municipality	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting	10/26/2022	City representatives attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
City of Victorville	Public Agency – Municipality	Homeless At-risk of Homelessness	ICH Meeting	10/26/2022	City representatives attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.

Agency/Org Consulted	Type of Agency/Org	Qualifying Population(s) Served	Method(s) of Consultation	Date(s) of Consultation	Feedback
		Other Populations (unstably housed)			
Town of Yucca Valley	Public Agency – Municipality	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting	10/26/2022	A town representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
San Bernardino County Administrative Office	Public Agency – Administration	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
San Bernardino County Counsel	Public Agency – Administration	Not Applicable	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
San Bernardino County Board of Supervisors	Public Agency – Elected Officials	Homeless At-risk of Homelessness Other Populations (unstably housed)	ICH Meeting	10/26/2022	Board of Supervisors members/staff attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.
US House of Representatives, CA 31	Public Agency – Elected Officials	Homeless At-risk of Homelessness	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.

Agency/Org Consulted	Type of Agency/Org	Qualifying Population(s) Served	Method(s) of Consultation	Date(s) of Consultation	Feedback
		Other Populations (unstably housed)			
Viewpoint Advocacy	Private Agency – Advocacy Organization	Not Applicable	ICH Meeting	10/26/2022	Agency representative did not provide specific comments at the meeting; Contacted by email for any follow-up input on 11/17; No response received.
Urban Initiatives	Private Agency – Advocacy Organization	Not Applicable	ICH Meeting	10/26/2022	An agency representative attended the ICH meeting on 10/26/2022 but did not provide specific input during the meeting.

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

The summary below includes input received through the ICH meeting on October 26, the stakeholder meeting on November 17, and all additional input shared via email following the meetings.

The County's recently adopted Homeless Strategic Action Plan calls for using HOME-ARP funds for Permanent Supportive and Service-Enriched Housing, Rental Assistance, and Administrative Activities. Participants generally agreed with the County's plan to provide funding for Permanent Supportive Housing, Service-Enriched Housing, Rental Assistance, and Administrative Activities. They particularly noted that there is substantial need for permanent affordable rental housing throughout the county.

Stakeholders mentioned that clients often have difficulty using TBRA/Housing Choice Vouchers because there is a large amount of demand for rental units and landlords select applicants without vouchers. While this type of assistance continues to be a need, it is often difficult for recipients to use their vouchers. Stakeholders also noted the need for emergency rental assistance for households at risk of eviction.

Other needs noted by stakeholders include: congregate shelter with mental health and addiction treatment services for chronically homeless persons; addiction treatment and sober living resources for veterans; cold weather shelter (particularly in the mountains region); food assistance; other supportive services for residents of permanent supportive and affordable housing; mobile addiction treatment services; and housing assistance for survivors of domestic violence. Stakeholders noted that needs vary by region within the county.

More detailed input notes by discussion question are shown below.

Discussion Questions

1. **The Homeless Strategic Action Plan proposes to program the HOME-ARP funds for Permanent Supportive Housing, Service-Enriched Housing, Rental Assistance, and Administrative Activities. Are these still the best uses of HOME-ARP funds? What unmet needs and gaps in the current housing and service delivery systems would remain?**

   Response Summaries:

   - Permanent affordable rental housing is a significant need, would be a good use of funds, and is an effective way to prevent homelessness.
   - Permanent supportive housing and housing for extremely low-income households is expensive housing to build and operate, so HOME-ARP is a good opportunity to address the gap in funding available for this type of housing. Assistance with pre-development costs would be beneficial for non-profit developers.
   - Funding resources for affordable housing and permanent supportive housing are competitive and oversubscribed. Direct investment by the County in new affordable housing and permanent supportive housing will boost a project's competitiveness for other funding sources as well.
   - There is a lack of affordable housing for people with physical and mental disabilities. Accessibility is important in all housing development and especially in permanent supportive housing.

- Locations for new developments should take into account fair housing considerations and requirements, including proximity to community resources such as hospitals, libraries, and workplaces.
- It is difficult to find landlords that will accept clients with TBRA/Housing Choice Vouchers, given that there is considerable demand for rental units.
- There is a need for emergency rental assistance to ensure housing stability and prevent evictions and homelessness.
- In the mountain region, there is need for emergency shelters, especially cold weather shelters.
- Food access assistance is needed.
- Supportive services for affordable housing and permanent supportive housing communities should focus on resident health outcomes, economic mobility, workforce training, and financial counseling.
- One participant noted a need for technical assistance to cities and non-profit organizations to provide homeless services, particularly in rural areas.
- One participant noted that non-congregate shelter and the Housing First model is not appropriate for all qualifying population subgroups, including many people who are chronically homeless or need services related to mental health or substance abuse. This group is often left out when attention is paid to people temporarily experiencing homelessness due to an unexpected event. The need for congregate shelters with attached services will remain a need/gap since it is not an eligible funding activity under HOME-ARP. Mobile/on-street addiction treatment is a need; while there is a provider (County Inroads) that offers this service, more funding may be needed.
- Needs vary by region. For example, in the mountains region, chronic homelessness makes up a small share of homelessness. Most funding is spent on non-chronic homeless because that is where most of the need is there.

2. **Should the County target HOME-ARP funding to any specific populations?**

- The state of California already designates some special populations (for example, large families) that get housing funding through tax credits or other statewide funding sources. If the County designates any specific populations for HOME-ARP funding, it should make sure they are compatible with other funding sources. This would allow developers to use multiple forms of subsidy.
- There is a continued need for housing and services for people who are survivors of domestic violence.
- Possible targeting includes people experiencing homelessness and other housing instability, people with disabilities and those at risk of institutionalization, people living in high poverty areas, and immigrants or people with limited English proficiency.
- Each region of the County decides what they will prioritize in their region under the HHAP (Homeless Housing, Assistance and Prevention Grant) Program. HOME-ARP priorities could also vary by region.
- Smaller/more rural areas (for example, Twentynine Palms) have growing homeless populations but typically have less resources and receive lower amounts of funding to assist them.

- Veterans may have challenges in accessing the HUD-VASH program and locations that participate in the program may be in areas that are perceived to be less safe (i.e., higher crime).
- Service needs for veterans with housing needs include resources for sober living/addiction treatment and transportation to resources.

3. **What collaboration opportunities would be important for ensuring the success of the County HOME-ARP funded projects?**

- The County's housing provider network prompts some collaboration between regions but there is still a lot of competition for funding between agencies.
- Domestic violence housing and service providers network well throughout the county.
- The amount of competition for funding makes collaboration difficult.
- Requiring collaboration among organizations in order to receive HOME-ARP funding could hurt small jurisdictions or organizations that don't have as many connections.
- There may be an opportunity to form a collaboration among business owners and service providers including work training programs to assist people who are homeless obtain jobs.

PUBLIC PARTICIPATION

Cities and counties that receive HOME-ARP funding must provide for and encourage public participation in the development of their HOME-ARP Allocation Plans. Before submission of their plans, grantees must provide residents with reasonable notice and an opportunity to comment on the proposed plan of at least fifteen (15) calendar days. Grantees must follow their Citizen Participation Plan guidelines for providing reasonable notice and opportunity to comment. Additionally, grantees must hold at least one public hearing during the development of the HOME-ARP Allocation Plan and prior to submission. Grantees must make the following information available to the public:

- The amount of their HOME-ARP grant; and
- The activities the city or county anticipates completing using their HOME-ARP grant.

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.

Prior to adoption by the San Bernardino County Board of Supervisors and submission to HUD, the County invited members of the public to participate in the HOME-ARP planning process by reviewing and commenting on the draft Allocation Plan. The draft HOME-ARP Allocation Plan was made available for public review and comment for a 15-day period from Monday, March 13 through Tuesday, March 28, 2023. Public notices were published in *The Sun* (San Bernardino County's official newspaper of record), *Big Bear Grizzly*, *Daily Press*, *Hi-Desert Star*, *Inland Valley Daily Bulletin/Ontario*, and *La Prensa Hispaña* (the primary Spanish newspaper serving San Bernardino County) to notify residents of the opportunity. Notice was also given on the San Bernardino County Department of Community Development and Housing (CDH) website. The public was invited to submit written comments to CDH by mail or email. Additionally, the County held a public hearing to receive comments on the draft HOME-ARP Allocation Plan on Tuesday, March 28, 2023 before the Board of Supervisors.

Public comment period:

- Start date: Monday, March 13, 2023
- End date: Tuesday, March 28, 2023

Public hearing:

- Public hearing before Board of Supervisors: Tuesday, March 28, 2023

Describe efforts to broaden public participation.

In completing this HOME-ARP Allocation Plan, San Bernardino County conducted public outreach to gather input from residents, County staff, the Continuum of Care, the Housing Authority of San Bernardino County, staff, and elected officials in cities within San Bernardino County, non-profit agencies, local service providers, housing developers, and others. To involve members of the public in the Plan, the County advertised its draft HOME-ARP Allocation Plan in six newspapers with circulation within San Bernardino

County, including notices in English and Spanish. Advertisements included the amount of the County's allocation, the range of activities eligible for funding, and the County's proposed use of HOME-ARP funds.

In the public notices, the County identified how residents can access the complete draft HOME-ARP Allocation Plan and provide comments in writing or at a public hearing. The public notices also specified procedures for requesting special accommodations for anyone needing support in order to fully participate in the public hearing, which was held on Tuesday, March 28, 2023, before the County Board of Supervisors.

The County offered a variety of avenues for members of the public to participate by commenting on the draft plan. These included both mail and email options for written comments and the opportunity to comment orally at the scheduled public hearing.

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

Before developing this HOME-ARP Allocation Plan, the County consulted widely with a variety of agencies and service providers whose clientele include the HOME-ARP qualifying populations. Consultations were achieved primarily through two virtual meetings and a follow-up questionnaire sent via email. The comments and recommendations received through these processes are summarized in the preceding "Consultation" section of this plan.

Comments received during the public comment period or public hearing will be added here prior to submission of the HOME-ARP Allocation Plan to HUD.

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

Any comments received but not accepted during the public comment period or public hearing will be added here prior to submission of the HOME-ARP Allocation Plan to HUD.

NEEDS ASSESSMENT AND GAPS ANALYSIS

HUD asks that HOME-ARP grantees evaluate the size and demographic composition of qualifying populations within their jurisdiction and assess the unmet needs of each of those populations. In addition, each grantee should identify any gaps within its current shelter and housing inventory as well as the service delivery system. Grantees should use current data, including point in time counts, housing inventory counts, or other data available through the Continuum of Care, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

The following sections discuss the needs of qualifying populations in San Bernardino County, making use of the Continuum of Care's February 2022 point-in-time count, local housing inventory counts, consultations with service providers, and national datasets including the U.S. Census Bureau's American Community Survey and HUD's Comprehensive Housing Affordability Strategy data.

Table 2 on the following page estimates the gaps between housing need and housing inventory using HUD's recommended methodology and sources. The Hub for Urban Initiatives and San Bernardino County Office of Homeless Services recently prepared separate estimates of the need for a variety of bed types to serve unsheltered homeless persons. This analysis indicated the need for an additional 473 emergency shelter beds, 1,104 rapid rehousing beds, and 649 permanent supportive housing beds per year to adequately serve unsheltered individuals.

Table 3 estimates the number of households at greatest risk of housing instability, defined by HUD as households with an annual income at or below 30% of area median income and who pay more than 50% of monthly household income towards housing costs, or a household with an income at or below 50% of the area median income who is at risk of homelessness. As shown, there is an estimated gap of 41,957 housing units affordable to households with incomes less than 30% of area median income.

TABLE 2 – HOMELESS NEEDS INVENTORY AND GAP ANALYSIS FOR SAN BERNARDINO COUNTY CONTINUUM OF CARE

	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Survivors of Domestic Violence	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	269	85	228	/	0								
Transitional Housing	221	65	115	/	12								
Permanent Supportive Housing	647	368	948	/	678								
Rapid Rehousing	1,788	419	472	/	151								
Sheltered Homeless						17	827	29	71				
Unsheltered Homeless						29	2,028	166	166				
Current Gap										/	/	1,542	/

Sources: https://www.sbcounty.gov/uploads/sbchp/SBC-2022-Homeless-Count-Report.pdf,
https://files.hudexchange.info/reports/published/CoC_HIC_State_CA_2021.pdf

TABLE 3 – HOUSING NEEDS INVENTORY AND GAP ANALYSIS

Non-Homeless			
	Current Inventory	**Level of Need**	**Gap Analysis**
	# of Units	# of Households	# of Households
Total Rental Units	65,904		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	3,923		
Rental Units Affordable to HH at 50% AMI (Other Populations)	12,734		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		45,880	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		26,520	
Current Gaps			59,666 units affordable to 50% AMI or less; 41,957 of which should be available to under 30% AMI

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

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

Homeless as defined in 24 CFR 91.5

The 2022 Point In Time Count for San Bernardino County indicates that, as of February 2022, there were 3,333 individuals experiencing homelessness within the County. This is an increase of roughly 7% from the number of individuals experiencing homelessness identified in 2020; however, the number of unsheltered homeless remained stable at 2,390. The number of sheltered homeless individuals increased by 28% during this same time period. Since 2016, San Bernardino County has experienced a 77% increase in the homeless population.

About 43.5% of homeless adults surveyed were considered chronically homeless, which is defined as being homeless for one year or more and having a disabling condition such as mental illness, chronic health condition, and a physical disability. 27% of adults surveyed had become homeless for the first time within the past twelve months.

Of the 3,333 individuals identified as homeless during the point in time count, 72% were unsheltered. The HUD-provided definition for unsheltered homelessness is as follows:

> "An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings."

The Gap Analysis table above indicates that San Bernardino County would require an additional 1,542 beds to house all unsheltered homeless adults. The 2022 point in time count reported that nearly 80% of unsheltered adults were men and that only 16 children were unsheltered, indicating a large degree of need for beds for unsheltered single men. Additionally, the count reported 166 unsheltered veterans, indicating a need for veteran shelter. Estimates prepared by the Hub for Urban Initiatives and San Bernardino County Office of Homeless Services were somewhat higher, indicating a need for 2,226 additional beds per year to serve the unsheltered homeless population, including 473 emergency shelter beds, 1,104 rapid rehousing beds, and 649 permanent supportive housing beds.

At Risk of Homelessness as defined in 24 CFR 91.5

HUD defines individuals and families earning under 30% AMI who also live in a rental unit with a severe housing problem as being at risk of homelessness. These problems are defined as the following:

- Housing unit lacks complete kitchen facilities;
- Housing unit lacks complete plumbing facilities;
- Household has more than 1.5 people per room; or
- Household is severely cost burdened: residents spend more than 50% of their income on housing costs.

The most recently available Comprehensive Housing Affordability Study (CHAS) data indicates that 45,880 such households exist within San Bernardino County, a number that does not include households earning under 30% AMI who live without severe housing problems. At the time of the San Bernardino County 2020 Consolidated Plan, the county reported only 3,923 rental units available to residents earning under 30% AMI, leaving such residents at great risk of becoming homeless due to inability to find affordable housing. Renters experiencing severe housing problems experience a higher risk of displacement due to such problems and therefore a higher risk of homelessness.

The Needles Housing Authority identified a long wait list for public housing units, indicating the degree to which there is need for additional affordable housing in the area. According to the housing authority, there are about 45 households on the waiting list for their 52 public housing units which typically have very low turnover, often less than one unit per year. HUD's Picture of Subsidized Households data also indicates long wait times for housing assistance in San Bernardino County. As of 2021 data, the average Housing Authority of the County of San Bernardino voucher holder spent about 10 months on the waiting list.

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

In 2020, the National Coalition Against Domestic Violence published an updated fact sheet stating that 34.9% of California women and 31.1% of California men experience intimate partner physical violence, intimate partner sexual violence and/or intimate partner stalking in their lifetimes (https://assets.speakcdn.com/assets/2497/ncadv_california_fact_sheet_2020.pdf). The same study also states that "In a single day in 2019, 81% of California domestic violence shelters served 5,644 adults and children. 1,236 requests for services went unmet due to lack of resources." The 2022 point-in-time count found 237 people experiencing homelessness due to domestic violence, dating violence, sexual assault or stalking in San Bernardino County. Of these, 166 individuals, or 70%, were unsheltered, indicating a need for both emergency and transitional housing for people experiencing homelessness due to feeling domestic violence.

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 addition to the significant renter population within San Bernardino County who are currently housed but earn under 30% AMI and are experiencing a severe housing problem, an additional 26,520 households are considered "at risk of housing instability" due to experiencing a severe housing problem while earning between 30-50% AMI. These households face a higher risk of displacement due to severe housing problems and, once displaced, are likely to face difficulty in securing new housing as San Bernardino County only has 12,734 units considered affordable to families earning under 50% AMI.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

According to data gathered from the 2022 point-in-time (PIT) count and the 2021 HUD housing inventory count report, San Bernardino County is currently over 1,500 beds away from meeting the needs of its the homeless population. Local estimates put this number higher, at about 2,226 units, including 473 emergency shelter beds, 1,104 rapid rehousing beds, and 649 permanent supportive housing beds. The 2022 PIT count found 29 unsheltered individuals who were members of unsheltered families and 2,028 unsheltered single adults, indicating a need for shelter for single adults within the County.

The 2022 Homeless Strategic Action Plan identified a variety of wrap-around services needed to assist the County's homeless population, including mobile healthcare; substance use disorder treatment and mental health support; access to meals and shower facilities; and case management and system navigation support.

At Risk of Homelessness as defined in 24 CFR 91.5

The most recently available CHAS data indicates that there are over 45,000 households in San Bernardino County who are at risk of homelessness. As described above, this population is defined as rental households who earn less than 30% AMI while also experiencing at least one severe housing issue. Such individuals may be at a higher risk of losing preexisting housing due to severe housing issues and will subsequently struggle to find new housing due to a severe lack of affordable housing within the county. To meet this need, San Bernardino County would need nearly 42,000 additional rental housing units affordable to households earning under 30% AMI.

Stakeholders that provided input for this HOME-ARP Allocation Plan noted the need for emergency rental assistance, food access assistance, workforce training, and financial counseling to support housing stability and prevent homelessness. They also identified the need for housing location assistance services, specifically to find landlords that will accept tenant-based rental assistance/Housing Choice Vouchers, given the considerable demand for rental units.

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

The 2022 PIT count identified 71 sheltered and 166 unsheltered individuals who were homeless as a result of fleeing domestic violence. At the time of the count such individuals were more than twice as likely to be unsheltered as sheltered, indicating potential difficulties in finding both temporary and permanent housing for individuals in this subgroup. The 2021 HUD housing inventory count report records only 24 safe haven beds within the county, all of which are only available to adults, potentially creating difficulty for parents with children fleeing domestic violence situations.

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 addition to over 45,000 rental households with at least one severe housing problem who earn under 30% AMI, San Bernardino County contains over 26,000 households with the same housing issues earning between 30-50% AMI. With fewer than 13,000 housing units affordable to this group, they will likely face the same difficulties as the under 30% AMI group in finding new housing if displaced. Preventing

displacement for rental households earning under 50% AMI may prove a key strategy for the county in preventing future homelessness.

Specific housing needs identified by stakeholders that provided input for this Plan include affordable rental housing, especially for elderly and disabled residents; permanent supportive housing; emergency rental assistance; and housing in mixed-income communities. A representative for San Bernardino County Veterans Affairs identified needs faced by veterans, including challenges accessing the HUD-VASH program and service needs related to transportation and to accessing support services for sober living.

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

One of the biggest gaps in the current shelter system is the lack of affordable rental housing within San Bernardino County. Data and stakeholder input indicates that there is a substantial number of households at high risk of housing instability due to low incomes and high housing costs. As shown in Table 3, there is an estimated gap of 41,957 housing units affordable to households with incomes at or below 30% of area median income countywide. Stakeholders corroborated this finding, noting that the physical lack of affordable units is one of the biggest barriers to housing stability. Even households that have assistance, such as a housing choice voucher, have difficulty securing affordable housing. Additional affordable housing units have the potential to serve a variety of qualifying populations, including people who are homeless, at risk of homelessness, facing housing instability, veterans, or fleeing domestic violence.

Another gap identified through both quantitative and qualitative data is the need for additional housing to serve unsheltered homeless persons. Point-in-time counts indicate continued need for housing and services for unsheltered persons and stakeholders noted continued need for emergency shelter as well. Depending on the individual or family, this need may be best satisfied through congregate or non-congregate shelter.

One of the most common service needs discussed in conjunction with affordable housing was the need for housing locator/navigator assistance. Many stakeholders indicated that voucher holders have difficulty finding units to rent. Other service needs identified include those focused on supportive services to improve resident health and mental health outcomes and economic mobility. For some homeless individuals, substance abuse services may also be a need. San Bernardino County anticipates using HOME-ARP funds to develop affordable rental housing and develop or acquire non-congregate shelter, with other funding available through the Homeless Partnership / Continuum of Care designed to provide related services.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a Participating Jurisdiction 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:

San Bernardino County does not wish to include additional characteristics related to "other populations" at "Greatest Risk of Housing Instability." The County will use HUD's definition: (1) A household with an annual income at or below 30% of area median income paying more than 50% of monthly household

income towards housing costs, or (2) a household with an income at or below 50% of the area median income who is at risk of homelessness.

Although the County does not wish to amend this definition, it does note that lack of affordable housing impacts the housing stability of moderate-income households as well, as noted by the Housing Authority of the County of San Bernardino. The County may consider the use of HOME-ARP funds in mixed-income housing developments that include affordable housing targeted to a range of household incomes.

Identify priority needs for qualifying populations:

San Bernardino County would benefit from considering a two-pronged comprehensive approach to addressing homelessness. First and most immediately, the county could expand its bed capacity for currently unsheltered individuals, including single adults. Second, the county could implement future-conscious homelessness prevention programs that focus on providing housing affordable to renters earning under 50% AMI. In addition, the county should ensure that there are family units available specifically for parents with children fleeing domestic violence situations, as this population may be overlooked under current care models.

Explain how the Participating Jurisdiction (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:

Data used in the previous section is from the following sources:

- 2022 San Bernardino County Continuum of Care Homeless County and Survey Final Report
- 2022 San Bernardino County Homeless Strategic Action Plan
- San Bernardino County 2020-2025 Consortia Consolidated Plan
- Homelessness in San Bernardino County - Data Trends and Recommendations, Prepared by the Hub for Urban Initiatives and the San Bernardino County Office of Homeless Services
- HUD 2021 Continuum of Care Homeless Assistance Programs: Housing Inventory Count Report
- HUD 2016 Comprehensive Housing Affordability Strategy (CHAS) data
- HUD 2021 Picture of Subsidized Households Data

In addition to these data sources, stakeholder input was also used to identify levels of need and gaps San Bernardino County's shelter and housing inventory and service delivery systems. Please see Table 1 for a list of organizations that provided input.

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.

HOME-ARP funds administered by the County will be used to develop affordable rental housing, including permanent supportive and/or service-enriched housing, and to develop or acquire non-congregate shelter. Projects and activities funded through HOME-ARP will be available to all qualifying populations, including:

- People who are homeless;
- People who are at risk of homelessness;
- People fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking;
- Other populations requiring services or assistance to prevent homelessness and with the greatest risk of housing instability; and
- Veterans, and families that include a veteran family member, who fall within one of the first four groups.

The County plans to carry out these activities through partnerships with housing and service providers. The County anticipates putting out Requests for Qualifications (RFQs) or Notices of Funding Availability (NOFAs) on an as-needed basis to identify projects and activities for funding with HOME-ARP. The RFQs and NOFAs will identify the eligible uses of funding and qualifying populations to be served, as outlined in this Plan.

The County's Department of Community Development and Housing (CDH) will coordinate RFQ or NOFA application process. CDH anticipates accepting RFQ or NOFA applications for HOME-ARP funding from for-profit or nonprofit entities, without any requirements for a specific corporate structure. To qualify for funding, project sites must have a San Bernardino County address. CDH will also manage any subgrants, including required monitoring and reporting for HOME-ARP activities.

CDH uses a similar competitive process to allocate annual HOME grant funds for affordable rental housing development and Community Housing Development Organizations (CHDOs). Information about HOME-ARP Program application requirements will be available on the Department website at https://sbcountycdha.com/. To receive notifications and information regarding NOFA releases and funding opportunities, interested entities may sign up with the County's electronic procurement system (e-Pro) to register as a vendor and periodically check CDH's website for updates.

Describe whether the Participating Jurisdiction will administer eligible activities directly.

The County anticipates using HOME-ARP funds to make subgrants to a variety of subrecipients for the production of permanent supportive and service-enriched housing and the provision of tenant-based rental assistance.

If any portion of the Participating Jurisdiction'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 Participating Jurisdiction's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the Participating Jurisdiction's HOME-ARP program.

Not applicable. The County will not allocate funds to a subrecipient or contractor to administer the entire HOME-ARP grant.

TABLE 4 – USE OF HOME-ARP FUNDING

Category	Funding Amount	Percent of Grant
Supportive Services	$0	0%
Acquisition and Development of Non-Congregate Shelters	$4,323,904	34%
Tenant-Based Rental Assistance (TBRA)	$0	0%
Development of Affordable Rental Housing	$6,485,855	51%
Non-Profit Operating	$0	0%
Non-Profit Capacity Building	$0	0%
Administration and Planning	$1,907,604	15%
Total HOME ARP Allocation	$12,717,363	100%

Describe how the Participating Jurisdiction will distribute HOME-ARP funds in accordance with its priority needs identified in the needs assessment and gaps analysis.

The largest share of San Bernardino County's HOME-ARP funding will be used for the development of affordable rental housing. This includes $6,485,855 or 51% of the total grant amount. Permanent affordable housing was the top need identified by stakeholders during the consultation process for this Plan. Stakeholders noted that permanent supportive housing and housing for extremely low-income households is expensive housing to build and operate, so HOME-ARP funds would be a good opportunity to address the gap in financing available for this type of housing.

Data reinforces what stakeholders shared. There were an estimated 3,333 homeless individuals in San Bernardino County as of the 2022 point-in-time homeless count, up significantly from 2,118 in the 2018 count. Additionally, there are an estimated 45,880 renter households in San Bernardino County with very low incomes and severe housing needs, such as spending more than 50% of income on rent or living in severely overcrowded conditions, that puts them at risk of homelessness or housing instability. In comparison, there are only 3,923 rental units affordable to households with very low incomes, indicating a severe need for additional affordable housing.

San Bernardino County estimates prepared by the Hub for Urban Initiatives and Office of Homeless Services indicate that the County would need about 2,226 beds per year to house unsheltered homeless

individuals and families. This figure includes about 473 emergency shelter beds, 1,104 rapid rehousing beds, and 649 permanent supportive housing beds.

San Bernardino County will spend an estimated 34% of its HOME-ARP grant (or $4,323,904) to develop or acquire non-congregate shelter. Non-congregate shelter provides private units or rooms as temporary shelter to individuals and families without requiring them to sign a lease. Several stakeholders identified a continued need for shelter space. Additionally point-in-time counts and estimates prepared by the Hub for Urban Initiatives and Office of Homeless Services indicate a continued need for emergency shelter in San Bernardino County.

Finally, San Bernardino County will spend an estimated 15% of its HOME-ARP grant (or $1,907,604) on program administration. This is the maximum share of the grant that grantees may allocate toward administrative costs.

Stakeholder input and input from County staff indicates that many households with Tenant-Based Rental Assistance (TBRA) have difficulty finding affordable units to rent. A successful TBRA program would require additional affordable housing units and/or housing locators to assist participants in finding a place to live with their TBRA voucher. Additionally, because the County does not currently operate a TBRA program, using HOME-ARP funding for TBRA would require development of a new program and additional administrative capacity. For these reasons, the County does not plan to use HOME-ARP funds for TBRA.

San Bernardino County will not allocate any HOME-ARP funds towards supportive services or non-profit operating and capacity building. Other funding sources available within San Bernardino County are designed to fund homeless services, including Homeless Housing, Assistance and Prevention (HHAP) funding available to the San Bernardino County Homeless Partnership through the State of California Homeless Coordinating and Financing Council (HCFC). Additionally, the Homeless Partnership anticipates providing about $700,000 in funding for non-profit training and capacity building. Rather than duplicating these uses, the County will focus its HOME-ARP funds on the production of additional affordable housing units and emergency shelter beds.

HOME-ARP PRODUCTION GOALS

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

San Bernardino County anticipates spending about $6,485,855 (of 51%) of its HOME-ARP allocation on the development of affordable rental housing units that will serve all qualifying populations. The County estimates that a total of 20 to 25 new affordable rental housing units will be created using HOME-ARP funds. It is anticipated that these units will include a mix of 2- and 3-bedroom units, with up to two beds per room.

Of the affordable rental units developed using HOME-ARP funds, at least 70% will be occupied by qualifying populations and at most 30% will be occupied by other low-income households (defined by HUD to be household with incomes at or below 80% of area median income).

For units to be occupied by qualifying populations, HOME-ARP rents will not exceed 30 percent of the adjusted income of a household whose annual income is equal to or less than 50 percent of the median income for the area, as determined by HUD (i.e., Low HOME Rents). For units to be occupied by other low-income households, HOME-ARP rents will not exceed Fair Market Rent or 30 percent of the adjusted income of a household with an annual income equal to 65 percent of the area median income, whichever is lower.

Affordable rental units developed using HOME-ARP funds will remain affordable for a minimum of fifteen (15) years, as outlined by HUD regulations.

The County will strive to produce as many new affordable rental housing units as efficiently possible, however, costs per unit may vary depending upon many factors, such as property acquisition and material and construction differences between various building types. The number of affordable rental units that a given project or activity will produce will be considered when evaluating responses to any RFQs or NOFAs. The County anticipates that the $6,485,855 in HOME-ARP funding can be used to leverage about $60 million for the development of new housing in conjunction with Low Income Housing Tax Credits or other affordable housing subsidy programs. Please see the "HOME-ARP Activities" section for a description of the County's plans regarding soliciting applications for HOME-ARP funding.

Describe the specific affordable housing production goals that the Participating Jurisdiction hopes to achieve and describe how the production goal will address the Participating Jurisdiction's priority needs.

San Bernardino County's priority needs for HOME-ARP qualifying populations are:

- Affordable housing, including permanent supportive housing and service-enriched housing; and
- Non-congregate emergency shelter and services.

By adding approximately 20 to 25 new affordable rental units to the County's inventory, HOME-ARP funds will help reduce the substantial need for units affordable to individuals and families with very low incomes.

Associated services (anticipated to be funded through other sources besides HOME-ARP) will further reduce gaps related to the provision of supportive services in San Bernardino County.

PREFERENCES

Identify whether the Participating Jurisdiction intends to give preference to one or more qualifying population or a subpopulation within one or more qualifying populations for any eligible activity or project.

Under HUD regulations, grantees have the option of developing preferences that would prioritize some qualifying populations or subpopulations over others in determining who is served by projects and activities funded through HOME-ARP. For example, a grantee could develop rental housing that gives preference to applicants who are chronically homeless over other applicants. In that case, people who are chronically homeless would be prioritized for admission before other qualifying populations. Other qualifying populations must be considered on a first come, first served basis, behind the group with preference.

If grantees do not establish any preferences, then its HOME-ARP projects and activities must serve all qualifying populations on a first come, first served basis. Applicants for projects and activities must be selected in chronological order of their application to the greatest extent possible, without the use of any preference or prioritization. Projects and activities should use waiting lists, with an applicant's order on the waiting list determined by when they applied.

San Bernardino County covers a large geography with varying levels of need and resources related to homelessness. Because of these varying needs, the County will not establish preferences among the qualifying populations identified by HUD regulations. Any projects or activities conducted using HOME-ARP funds will be available on a first come, first served basis to all qualifying populations, including:

- People who are homeless;
- People who are at risk of homelessness;
- People fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking;
- Other populations requiring services or assistance to prevent homelessness and with the greatest risk of housing instability; and
- Veterans, and families that include a veteran family member, who fall within one of the first four groups.

If San Bernardino County later decides to establish preferences for any of its projects or activities funded using HOME-ARP, the County will amend this plan to outline those preferences.

In administering its HOME-ARP grant funding, the County will act in compliance with all applicable fair housing, civil rights, and nondiscrimination requirements. Eligibility and selection of applicants will be determined without regard to an applicant's race, color, religion, sex (including gender identity and sexual orientation), disability, familial status, or national origin. The County will follow best practices to maintain the confidentiality of applicants who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.

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 Participating Jurisdiction's needs assessment and gap analysis.

Not applicable. The County has not identified any preferences in this Allocation Plan. Should the County desire to fund a project that uses preferences with HOME-ARP funds, the County will amend this Allocation Plan accordingly.

Referral Methods

Identify the referral methods that the Participating Jurisdiction intends to use for its HOME-ARP projects and activities. Participating Jurisdictions may use multiple referral methods in its HOME-ARP program.

San Bernardino County anticipates that referrals for its HOME-ARP projects will be generated from the network of housing and social service agencies operating within the county. HOME-funded housing developments and non-congregate shelters shall maintain waiting lists that include applicants from all qualifying populations, to be served in chronological order (i.e., on a first-come, first-served basis).

As part of the project selection process, San Bernardino County will ask agencies responding to its Notice of Funding Availability (NOFA) for their anticipated plan for receiving referrals and managing waiting lists in order to serve all eligible qualifying populations and meet other HOME-ARP requirements. San Bernardino County's HOME-ARP projects and activities will serve all qualifying populations without preference, including:

- People who are homeless;
- People who are at risk of homelessness;
- People fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking;
- Other populations requiring services or assistance to prevent homelessness and with the greatest risk of housing instability; and
- Veterans, and families that include a veteran family member, who fall within one of the first four groups.

If the Participating Jurisdiction 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.

Grantees have the option of using their Continuum of Care's Coordinated Entry (CE) process as a referral method for projects and activities funded using HOME-ARP. However, Coordinated Entry processes may not include all HOME-ARP qualifying populations and may use preferences or prioritization approaches that are not compatible with a grantees' HOME-ARP Plan. In these cases, grantees must also use other referral methods to ensure that applicants are selected for projects and activities in chronological order, with consideration for any preferences established in the HOME-ARP Allocation Plan.

San Bernardino County does not plan to use the Coordinated Entry process as a referral method for projects and activities funded using HOME-ARP funds. The County plans to establish waiting lists for each HOME-ARP project or activity, with qualifying individuals and families accepted on a chronological basis.

If the Participating Jurisdiction intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE.

San Bernardino County does not plan to use the Coordinated Entry process as a referral method for projects and activities funded using HOME-ARP funds. The County plans to establish waiting lists for each HOME-ARP project or activity, with qualifying individuals and families accepted on a chronological basis.

If the Participating Jurisdiction intends to use both a CE process established by the CoC and another referral method for a project to activity, describe any method of prioritization between the two referral methods, if any.

San Bernardino County does not plan to use the Coordinated Entry process as a referral method for projects and activities funded using HOME-ARP funds. The County plans to establish waiting lists for each HOME-ARP project or activity, with qualifying individuals and families accepted on a chronological basis.

Limitations in a HOME-ARP Rental Housing or NCS Project

Describe whether the Participating Jurisdiction 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.

Under HUD regulations, grantees have the option of establishing limitations for some projects or activities funded through HOME-ARP. A limitation would restrict eligibility for the project to certain qualifying populations or subpopulations. Examples of limitations include a shelter that limits admission to survivors of domestic violence or a rental project that limits occupancy to homeless veterans. Limitations are only allowed when necessary to address housing or service gaps that cannot be addressed through the use of a preference. Additionally, if a grantee has projects that include limitations, it must also have other HOME-ARP-funded projects that serve all qualifying populations.

San Bernardino County will not limit eligibility for housing or non-congregate shelter developed or acquired using HOME-ARP funds to particular qualifying populations or subpopulations. Any housing or shelter developed or acquired using HOME-ARP funds will be available on a first come, first served basis to all qualifying populations, including:

- People who are homeless;
- People who are at risk of homelessness;
- People fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking;
- Other populations requiring services or assistance to prevent homelessness and with the greatest risk of housing instability; and

- Veterans, and families that include a veteran family member, who fall within one of the first four groups.

If a Participating Jurisdiction 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 Participating Jurisdiction's needs assessment and gap analysis.

Not applicable. San Bernardino County will not limit eligibility for housing or non-congregate shelter developed or acquired using HOME-ARP funds to particular qualifying populations or subpopulations. Any housing or shelter developed or acquired using HOME-ARP funds will be available on a first come, first served basis to all qualifying populations, including:

- People who are homeless;
- People who are at risk of homelessness;
- People fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking;
- Other populations requiring services or assistance to prevent homelessness and with the greatest risk of housing instability; and
- Veterans, and families that include a veteran family member, who fall within one of the first four groups.

If a limitation was identified, describe how the Participating Jurisdiction 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 Participating Jurisdiction's HOME-ARP projects or activities).

Not applicable. San Bernardino County will not limit eligibility for housing or non-congregate shelter developed or acquired using HOME-ARP funds to particular qualifying populations or subpopulations. Any housing or shelter developed or acquired using HOME-ARP funds will be available on a first come, first served basis to all qualifying populations, including:

- People who are homeless;
- People who are at risk of homelessness;
- People fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking;
- Other populations requiring services or assistance to prevent homelessness and with the greatest risk of housing instability; and
- Veterans, and families that include a veteran family member, who fall within one of the first four groups.

HOME-ARP REFINANCING GUIDELINES

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

- **Establishing 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.**

- **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.**

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

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

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

- **Other requirements in the Participating Jurisdiction's guidelines, if applicable.**

San Bernardino County will not use HOME-ARP funds to refinance existing debt and has not established any HOME-ARP refinancing guidelines in this plan. Thus, the conditions and requirements listed above are not applicable. If San Bernardino County later decides to use HOME-ARP funds to refinance existing debt secured by multifamily housing being rehabilitated with HOME-ARP funds, the County will amend this plan to outline refinancing guidelines that meet the conditions listed in this section.

APPENDIX

Stakeholder List

The table below lists stakeholders invited to the November 17 stakeholder meeting, with additional columns indicating whether they attended or provided follow-up input via email. Email invitations were sent to organizations listed below on 11/08/2022 and 11/10/2022, and a follow-up email outlining opportunity to comment via email was went on 11/17/2022. A total of 14 attendees joined the meeting, not including County or Mosaic staff. Stakeholders were identified by San Bernardino County staff, with the exception of the Mountain Homeless Provider Network Viewpoint Advocacy, who both requested to join additional outreach opportunities for the project following the ICH meeting. National Community Renaissance and Hope for Housing Foundation co-signed a letter with additional input for the HOME-ARP Allocation Plan.

Organization	Attended Stakeholder Meeting	Provided Follow-Up Input by Email	Outreach Notes
San Bernardino County Interagency Council on Homelessness (ICH)	No	No	Agency representative provided input at ICH Meeting on 10/26/2022.
Knowledge and Education for Your Success (KEYS)	Yes	No	Agency representative did not provide specific comments at the meeting; Contacted by email for any follow-up input on 11/17/2022; No response received.
Street Life Project	Yes	No	Agency representative did not provide specific comments at the meeting; Contacted by email for any follow-up input on 11/17; No response received.
New Hope Village	Yes	No	Agency representative did not provide specific comments at the meeting; Contacted by email for any follow-up input on 11/17; No response received.
Desert Sanctuary Haley House	Yes	No	Agency representative provided comments during the stakeholder meeting on 11/17.
Option House	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
Morongo Basin Aligning Resources Challenging Homelessness (ARCH)	No	No	Provided input at ICH Meeting on 10/26/2022.
Jamboree Housing Corporation	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
Veterans Affairs	No	No	Agency representative provided written input via email on 1/27/2023.

Organization	Attended Stakeholder Meeting	Provided Follow-Up Input by Email	Outreach Notes
U.S. Vets	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022 and 1/12/2022. Contacted by phone on 1/13, 1/19 and 1/20/2023. Agency representative anticipated to provide written input via email. No response received.
Housing Authority of the County of San Bernardino (HACSB)	No	No	Agency representative provided written input via email on 1/12/2023.
San Bernardino County - Department of Behavioral Health (DBH)	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
Inland Fair Housing and Mediation Board (IFHMB)	No	Yes	Agency representative provided written input via email on 12/6/2022.
Inland Regional Center (IRC)	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
City of Adelanto	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
City of Barstow	Yes	No	Agency representative provided comments during the stakeholder meeting on 11/17/2022.
City of Big Bear Lake	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
City of Chino Hills	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
City of Colton	Yes	No	Agency representative did not provide specific comments at the meeting; Contacted by email for any follow-up input on 11/17/2022; No response received.
City of Grand Terrace	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.

Organization	Attended Stakeholder Meeting	Provided Follow-Up Input by Email	Outreach Notes
City of Highland	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
City of Loma Linda	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
City of Montclair	Yes	No	Agency representative provided comments during the stakeholder meeting on 11/17/2022.
City of Needles	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
City of Rancho Cucamonga	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
City of Redlands	Yes	No	Agency representative did not provide specific comments at the meeting; Contacted by email for any follow-up input on 11/17/2022. No response received.
City of Twentynine Palms	Yes	Yes	Agency representative provided comments during the stakeholder meeting on 11/17/2022.
City of Yucaipa	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
Town of Yucca Valley	No	No	Contacted regarding stakeholder meeting on 11/8 and 11/10/2022. Contacted for follow-up input on 11/17/2022. No response received.
Mountain Homeless Provider Network Contact	Yes	No	Agency representative provided comments during the stakeholder meeting on 11/17/2022.
National Community Renaissance	No	Yes	Agency representative provided comments during the stakeholder meeting on 11/17/2022 and in letter co-signed with Hope through Housing Foundation.
Hope through Housing Foundation	No	Yes	Agency representative provided comments in letter co-signed with National Community Renaissance.

ICH Meeting Attendee List

Organization
1. San Bernardino County Homeless Partnership
2. San Bernardino County Office of Homeless Services
3. San Bernardino County Community Revitalization
4. San Bernardino County Dept of Aging and Adult Services
5. San Bernardino County Administrative Office
6. San Bernardino County Behavioral Health Department
7. San Bernardino County Board of Supervisors
8. San Bernardino County Counsel
9. San Bernardino County Probation Dept
10. San Bernardino County Sheriff's Department
11. San Bernardino County Superintendent of Schools
12. Brilliant Corners
13. Central Valley Regional Homeless Provider Network
14. City of Barstow
15. City of Ontario
16. City of Rancho Cucamonga
17. City of San Bernardino
18. City of Victorville
19. Community Action Partnership of San Bernardino County
20. Desert Manna
21. Domestic Violence Education and Services (DOVES)
22. Family Service Association of Redlands
23. First Step Staffing
24. Foothill AIDS Project
25. House of Ruth
26. Housing Authority of the County of San Bernardino
27. Inland Valley Hope Partners
28. Knock Knock Angels
29. Knowledge and Education for Your Success (KEYS)
30. Lutheran Social Services of Southern California
31. Mercy House
32. Molina Healthcare
33. Morongo Basin Aligning Resources Challenging Homelessness (ARCH)
34. Mountain Regional Homeless Provider Network
35. Re-Entry Clinical Housing and Supportive Services

Organization
36. Step Up on Second
37. Time for Change Foundation
38. Town of Yucca Valley
39. Urban Initiatives
40. US House of Representatives, CA 31
41. Veterans Affairs
42. Victor Elementary School District
43. Victor Valley Family Resource Center
44. Victor Valley Rescue Mission
45. Viewpoint Advocacy
46. West Valley Regional Homeless Provider Network
47. Women Who Matter Too
48. YouthBuild Inland Empire