



HOME-ARP Allocation Plan

Turlock/Stanislaus County HOME Consortium

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Introduction

The Turlock/Stanislaus County HOME Investment Partnership Program (HOME) Consortium's HOME American Rescue Plan Program (HOME-ARP) Allocation Plan outlines how the Consortium plans to spend its HOME-ARP funds. In 2021, Congress passed the American Rescue Plan Act, which provided \$5 billion to communities across the country to address the ongoing impacts of the COVID-19 pandemic on the economy, public health, governments, individuals, and businesses. This one-time funding is administered through the U.S. Department of Housing and Urban Development's (HUD's) HOME and is referred to as HOME-ARP.

As a HOME grantee, or participating jurisdiction (PJ), the Turlock/Stanislaus County HOME Consortium will receive a HOME-ARP allocation of \$5,323,420, which will be administered by the City of Turlock. The Consortium includes the City of Turlock and Stanislaus Urban County, which comprises all unincorporated areas of the County and the cities of Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, and Waterford. The City of Modesto is not a member of the HOME Consortium and receives its own separate funding allocations.

Four eligible groups of recipients can be assisted by HOME-ARP funds and are referred to as "qualifying populations" (QPs). These QPs include:

- **Individuals experiencing homelessness**, as defined in 24 CFR 91.5.
- **Individuals at risk of homelessness**, as defined in 24 CFR 91.5.
- **Persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking**, as defined by HUD.
- **Other populations for whom providing supportive services or assistance would prevent homelessness or would serve those at greatest risk of housing instability.**

Communities can use their HOME-ARP funds for specific eligible activities, which include:

- **Development of affordable rental housing.**
- **Tenant-based rental assistance.**
- **Supportive services.**
- **Development of non-congregate shelter facilities.**
- **Capacity building and operating support for organizations implementing a HOME-ARP activity.**
- **Planning and administration costs.**

Each PJ must first develop an Allocation Plan in order to receive its HOME-ARP funds. HUD has established a set of requirements for the allocation planning process as well as the following specific elements that must be included in the HOME-ARP Allocation Plan:

- A summary of the consultation process, its results, and any comments received through public participation, including any recommendations not accepted and the reasons why.
- A description of the size and demographic composition of the four QPs within the jurisdiction.
- Identification and assessment of the unmet needs for services, shelter, and housing for each QP.
- An assessment of the existing gaps in the grantee's housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system.
- A description of the grantee's planned uses for HOME-ARP funds across the eligible activities based on the unmet needs of the QPs. This must include an allocation of HOME-ARP resources among the eligible activities and planned distribution methods.
- An estimate of the number of housing units that the grantee anticipates producing or preserving with HOME-ARP funds.
- Identification of any preferences for serving a QP or subpopulation as well as the planned referral methods.

The Consortium retained the Cloudburst Group to support the allocation planning process and development. Planning activities commenced in November 2022 and included stakeholder consultation sessions, an online stakeholder survey, and extensive analysis of multiple data sources. The consultation sessions and survey sought to engage service, shelter, and housing providers as well as others with knowledge of the HOME-ARP QPs across the County. These perspectives, along with quantitative data analysis, helped the Consortium better understand the multi-faceted and complex service, shelter, and housing needs facing the QPs and ultimately informed the allocation decisions in the HOME-ARP Allocation Plan.

The following document utilizes the suggested format provided by HUD for the development of the HOME-ARP Allocation Plan. Regulatory requirements and prompts provided by HUD for each section are included in the document to provide context for the components of the Allocation Plan.

Consultation Process

Regulatory Requirements

PJs must consult with several different stakeholder organizations as outlined in Section V.A of HUD [Notice: CPD-21-10](#). These stakeholders include:

- Continuums of Care (CoCs) serving the jurisdiction's geographic area.
- Homeless service providers.
- Domestic violence service providers.
- Veterans' groups.
- Public housing authorities/agencies.
- Public agencies that address the needs of the QPs.
- Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

HUD requires all PJs to complete the consultation process for HOME-ARP prior to the development of the Allocation Plan.

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

The Consortium conducted three stakeholder consultation sessions in December 2022 and January 2023 to gather input from seven individuals across four agencies working to meet the needs of the QPs. The Consortium also developed and distributed an online stakeholder survey, which gathered 36 responses from 26 organizations. The Consortium encouraged all consultation participants to complete the survey, which provided an opportunity for additional input. Overall, the Consortium received input from all the required organization types including the one CoC and two PHAs serving individuals in the Consortium.

Consultation Sessions

The Consortium held two targeted virtual consultation sessions in December 2022 with organizations working with the four QPs across Stanislaus County to inform its HOME-ARP Allocation Plan. Each session was held via Zoom and was facilitated by consultants. The December consultations targeted organizations serving special populations. Other stakeholder organizations were consulted through a Stanislaus Community System of Care (Stanislaus CoC governance body) meeting in January 2023. The Consortium encouraged all consultation session participants to complete the survey, which the Consortium also sent to stakeholders who could attend consultation meetings.

Each session began with an overview presentation of the HOME-ARP program, the QPs, and the five eligible HOME-ARP activities. The objective of the overview presentation was to provide stakeholders with an opportunity to gain awareness of the HOME-ARP program and share their comments and concerns with Consortium staff. Following the presentation, the consultants facilitated a discussion on the unmet needs and challenges facing the QPs regarding shelter, services, and housing. Each group was also asked to identify priorities for the use of HOME-ARP funds. These discussions allowed Consortium staff to hear the needs and challenges facing the QPs directly from service providers and agencies working with these populations. The Consortium scheduled each consultation session for one- to one-and-a-half hours and organized them around specific topics to gather input from stakeholders working with similar populations.

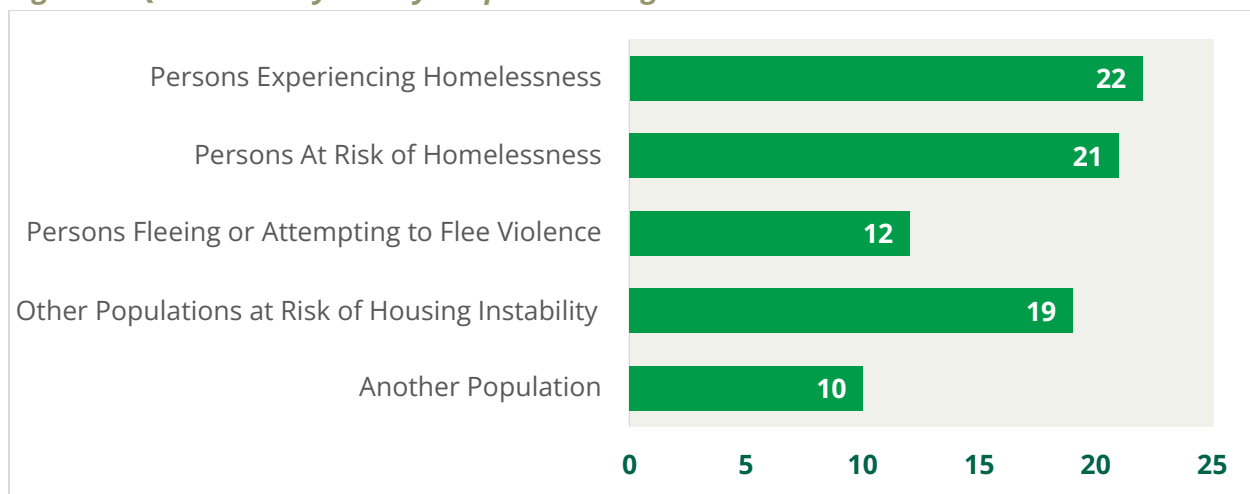
Stakeholder Survey

The Consortium also developed and distributed an online survey to gather input from service providers across Turlock and Stanislaus County. The use of a survey in combination with the consultation sessions allowed the Consortium to cast a broader net to engage additional stakeholders and to gather more specific and detailed information. This strategy enabled the Consortium to hear from individuals who were unable to attend one of the virtual consultation sessions as well as provide an additional avenue of feedback for attendees.

The survey began with a high-level overview of the HOME-ARP program and eligible activities, the amount of HOME-ARP funds allocated to the Consortium, and definitions of each of the HOME-ARP QPs. Throughout the survey, the Consortium repeated the definitions of the HOME-ARP QPs and provided additional information as needed to help clarify HOME-ARP terms (e.g., the definition of non-congregate shelter) to assist survey respondents.

Figure 1 indicates that there was an even distribution of organizations working across the HOME-ARP QPs served. Of those organizations surveyed, 85 percent served individuals experiencing homelessness; 81 percent served individuals at risk of homelessness; 50 percent served persons fleeing or attempting to flee domestic violence, sexual assault, dating violence, stalking, and human trafficking; and 73 percent served other populations at risk of homelessness or housing instability. Of those surveyed, ten respondents (38 percent) indicated that they served another population, including farm workers, the elderly, Tribal members, persons with disabilities, veterans, first-time homebuyers, and youth. Most respondents who indicated that their organization served another population also served one of the four HOME-ARP QPs.

Figure 1: QPs Served by Survey Respondent Organizations



Between the consultation sessions and the stakeholder survey, the Consortium gathered input from 33 organizations on the housing, shelter, and service needs facing the HOME-ARP QPs across the community. The Appendix includes a complete list of the organizations that provided input during the development of the Allocation Plan and lists the organization type, QPs served, and consultation method for each organization. Table 1 outlines organizations and individuals consulted, by consultation method.

Table 1: Consulted Organizations by Consultation Method

Consultation Meetings	
Meeting Focus and Date	Attendees
Victim-Survivor Services 12/22/2022	Center for Human Services; HAVEN
Fair Housing 12/22/2022	Disability Resources Agency for Independent Living; LGBTQ Collaborative

Stanislaus Community System of Care 1/19/2023	Children's Crisis Center; City of Modesto; City of Patterson; City of Riverbank; City of Turlock; Community Impact Central Valley; HAVEN; Health Net; Health Plan of San Joaquin; Modesto Gospel Mission; Oakdale Rescue Mission; Stanislaus County Behavioral Health; Stanislaus County Community Services Agency; Stanislaus County Office of Education; Stanislaus County Planning Department; Stanislaus County Workforce Development; Stanislaus Homeless Alliance; Turning Point; United Samaritans; We Care – Turlock; Various community members
Survey Respondents	
California Phones	EAH Housing
California Rural Legal Assistance	Habitat for Humanity, Stanislaus
Center for Human Services	HAVEN
Central Valley Opportunity Center	Project Sentinel
City of Newman	Self-Help Enterprises
City of Oakdale	Stanislaus County Department of Planning and Community Development
City of Patterson	Stanislaus Regional Housing Authority/Housing Authority of the City of Riverbank*
City of Riverbank	Turlock Gospel Mission
City of Waterford	Turningpoint Community Programs
Community Housing and Shelter Services	United Samaritans Foundation
Community Impact Central Valley	Valley Mountain Regional Center
Department of Veteran Affairs	We Care Program—Turlock
Disability Resources Agency for Independent Living	
<i>*The Housing Authority of the City of Riverbank is administered by the Stanislaus Regional Housing Authority but is counted as a unique organization for HOME-ARP consultations.</i>	

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

Consultation Session Themes

Through discussions with stakeholders as part of the consultation sessions, the Consortium was able to hear directly from organizations working with the four HOME-ARP QPs on the housing, shelter, and service needs they are seeing in their communities. Stakeholders spoke of the tremendous needs and challenges faced by the QPs as well as by program staff in providing services to these communities.

Across both virtual consultation sessions, several cross-cutting themes emerged. Stakeholders described how all four of the HOME-ARP QPs have complex needs that often require long-term access to affordable housing coupled with supportive services. Programs that provide both housing and supportive services can have a significant positive impact on people's lives; however, the overall lack of affordable housing limits the housing that is available to them. Stakeholders explained how rising rents and low vacancy rates have dramatically reduced the available stock of privately-owned rental housing. The current housing and shelter inventory, as well as the service delivery system, is strained and lacks the capacity to meet the growing needs of the QPs.

Affordable Housing and Rental Assistance Themes

Stakeholders spoke about the current rental market in Turlock and Stanislaus County and emphasized the need for affordable rental housing. Stakeholders described the rental market as being so tight that landlords can raise rents drastically and set inaccessible screening criteria. Rents are so high that if one high utility bill or unexpected expense comes up, "you're caught between a rock and a hard place...like, 'I can't afford rent this month,' or 'I'm behind on my rent because this happened.' And that makes it unstable for them."

Even when people have access to rental assistance to help them afford rent, there's enough demand for units that landlords can afford to discriminate based on voucher usage; less-than-ideal criminal, rental, or credit backgrounds; or even protected classes. One service provider shared that, "many clients have gone through the application process to obtain their Section 8 voucher but are still having a very, very difficult time finding a place and finding a landlord who's willing to work with them with Section 8. I mean, just with one client, I spent the last six months applying for a unit. And if it's not one thing, it's another, and this is *with* a Section 8 voucher; I can only imagine without one. So, it's been so hard for a lot of our clients to find anything."

Another provider described supporting another voucher holder in their housing search: "One of the other issues we found was whenever the individual we had had a voucher, and

finally did find a place but then when the person met them person-to-person, they were not passing, they were transgender. And so, the landlord actually told them, 'oh, we already have one of you living here. That's our limit.' So that's the type of thing they encounter. So, she ended up losing the voucher because she couldn't use it. No one else would even talk to her. So that's another issue is inventory—there is no inventory here for people to move into. And when they do find it, it's either discrimination or they can't afford the deposit.”

Individuals may find affordable housing in smaller cities or rural areas but these areas are frequently not accessible for a person's disability (e.g., wheelchair inaccessible); are far away from needed medical care, healthy food, or transportation; and/or are unwelcoming to lesbian, gay, bisexual, transgender, queer/questioning or not otherwise straight and cisgender (LGBTQ+) folks.

Non-Congregate Shelter Themes

A few themes emerged related to shelter during the consultation sessions, particularly around the lack of access for specific subpopulations. Stakeholders indicated there is minimal shelter for families with adult men and/or adolescent boys, leading to families separating across women-led family shelters, youth shelters, and men's shelters. There are also challenges for people with disabilities and LGBTQ+ folks seeking shelter. Existing shelter buildings are not wheelchair accessible, residents may be required to use top bunks, and congregate shelter providers may turn away individuals who are currently ill. Individuals have been kicked out of shelters for behaviors that present when they are off their medications. Finally, “many shelters know that [the Equal Access rule] exists, but they don't follow it.”

Supportive Services and Non-Profit Capacity Themes

Stakeholders described a variety of services that exist in Turlock and Stanislaus County, including victim-survivor advocacy, food and transportation assistance, and disability support services. However, existing services are not sufficient to meet the demand. Stakeholders identified needs for housing case management, shelter services, outreach, legal services, and services for survivors of labor trafficking. One stakeholder related, “we have a lot of conversations around sex trafficking, but not labor trafficking. So, I think that would be an area where there're not a lot of services. Labor trafficking survivors come with many different barriers. A lot of labor trafficking survivors have language barriers. They're undocumented. They need to get access to legal services, and just different things like that.”

Stakeholders indicated the largest barriers to providing services are administrative and funding hurdles. Organizations may receive HUD grants to pay for services, but these funds

do not cover the indirect costs (such as healthcare, paid time off, and training) required to provide effective services. Because providers are unable to pay a living wage, they have difficulty maintaining a well-trained workforce. Even obtaining funding is a challenge for smaller organizations. One stakeholder shared, “it’s always the same people getting the same funding over and over. And they say they want equity and they want diversity. Yet, all these years, they haven’t been doing that. And now you’re saying you want it. But the new people that can provide that, like [culturally specific programs], aren’t allowed to access those funds.”

Stanislaus Community System of Care Session

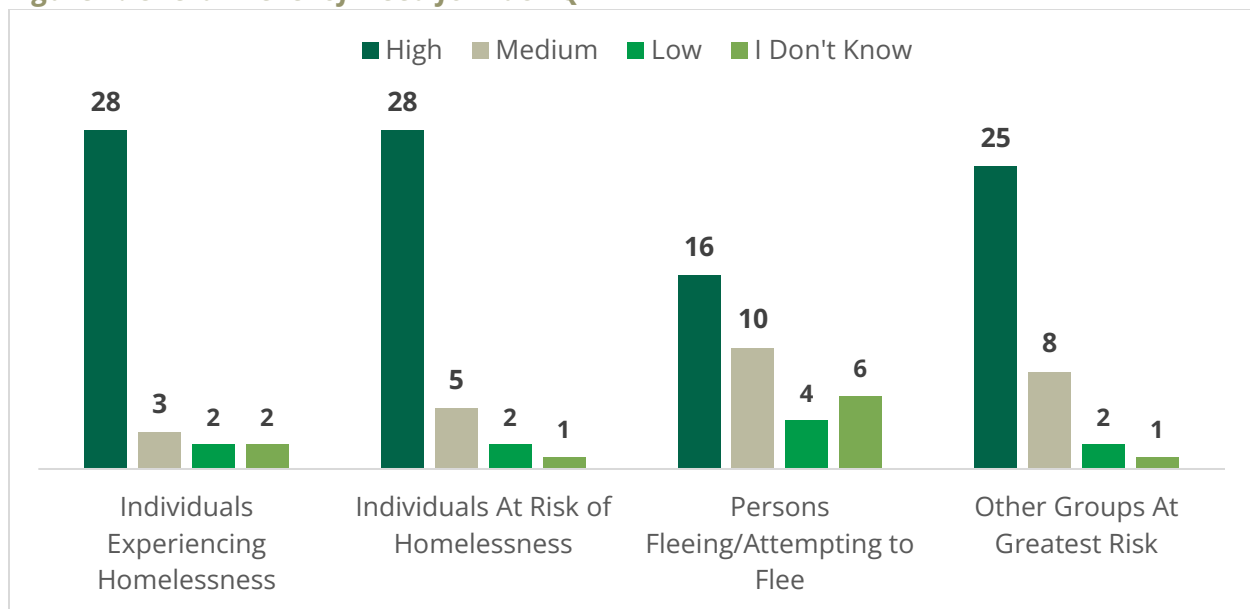
Due to a full agenda, Community System of Care Council feedback was limited to individual member participation—including from the CoC Lead Agency—in the survey, as described below.

Feedback From Stakeholder Survey

The following section summarizes the major takeaways from the stakeholder survey. The Appendix contains a complete list of the multiple-choice results from the survey.

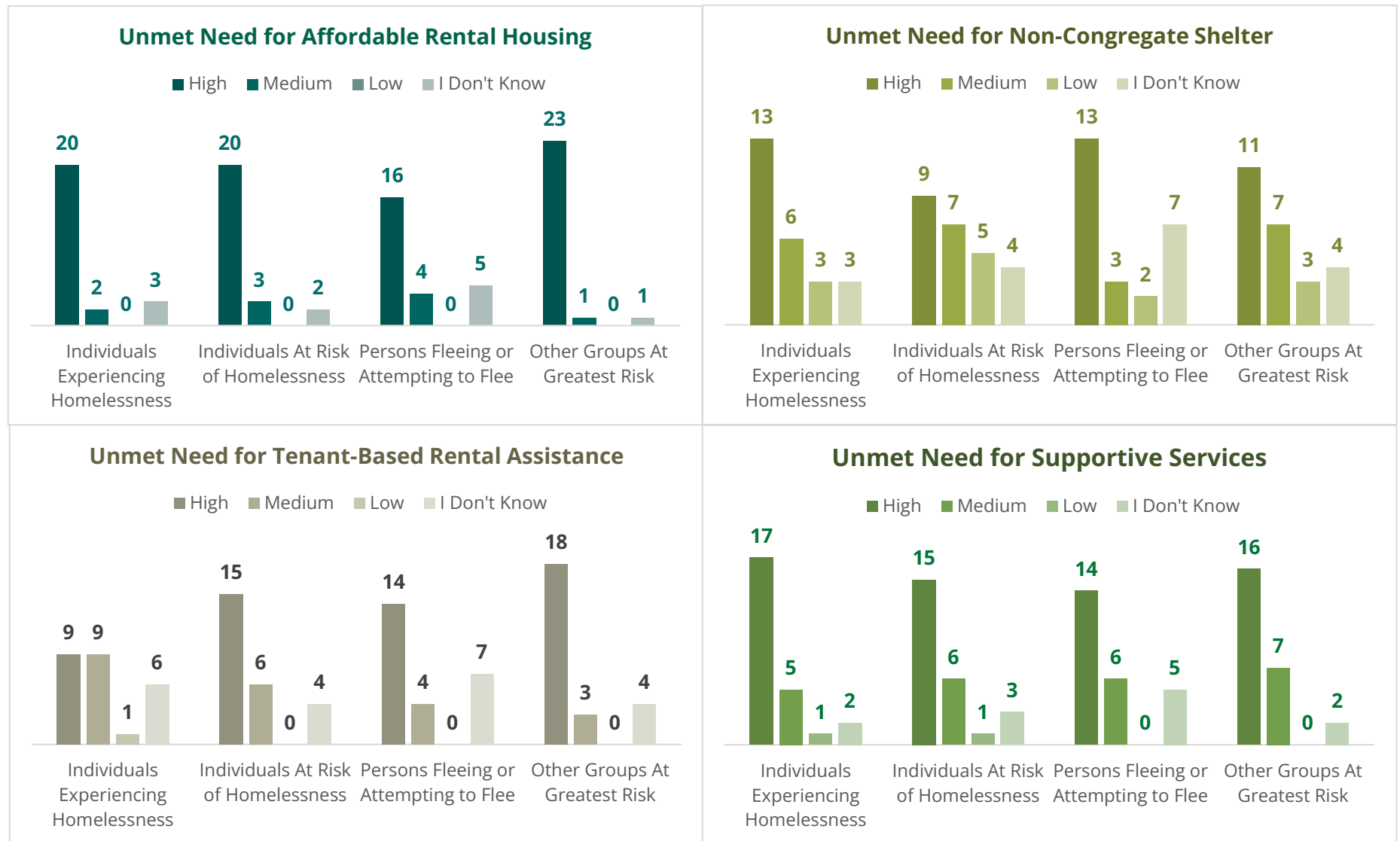
The survey asked a series of questions to gauge the level of need for housing, shelter, and services for each of the HOME-ARP QPs. One question asked respondents to rank the overall level of need for each of the four QPs using a scale of high, medium, and low. Respondents were provided the option to opt out of ranking any of the populations by responding “I don’t know.” The results of this question are summarized in Figure 2 and indicate that most respondents felt that each QP faced high overall needs. Eighty percent of respondents indicated that there were high overall needs for individuals experiencing homelessness and for individuals at risk of homelessness. There was greater variation across responses for persons fleeing or attempting to flee and for other populations. Specifically, 44 percent of respondents ranked persons fleeing or attempting to flee as having high needs and 28 percent said this QP had medium needs. For other populations at greatest risk of homelessness or housing instability, 69 percent indicated there were high needs and 22 percent said this QP had medium needs.

Figure 2: Overall Level of Need for Each QP



The survey then asked respondents to indicate the level of need for affordable rental housing, tenant-based rental assistance, supportive services, and non-congregate shelter for each of the QPs. Figure 3 shows that in general, respondents felt there is a high level of need for each activity for all QPs. When comparing the results across eligible activities, however, more respondents indicated that there were high unmet needs for affordable rental housing relative to the other eligible activities. Specifically, when it came to affordable rental housing, 83 percent of respondents indicated there was a high unmet need for individuals experiencing homelessness, 78 percent indicated a high unmet need for individuals at risk of homelessness, 58 percent indicated a high unmet need for persons fleeing or attempting to flee, and 86 percent indicated a high unmet need for other populations. In comparison, for supportive services, these figures were 69 percent, 56 percent, 50 percent, and 61 percent, respectively. For non-congregate shelter, these percentages were 53 percent, 33 percent, 47 percent, and 44 percent, respectively, while for tenant-based rental assistance, they were 39 percent, 56 percent, 53 percent, and 67 percent, respectively.

Figure 3: Unmet Needs for the HOME-ARP-Eligible Activities for Each QP



When asked to prioritize how they would spend HOME-ARP funds across the eligible activities, the majority of respondents indicated they would prioritize affordable rental housing, followed by tenant-based rental assistance and supportive services, non-congregate shelter, and then non-profit capacity building.

Figure 4: Prioritization of HOME-ARP Funds Across the Eligible Activities

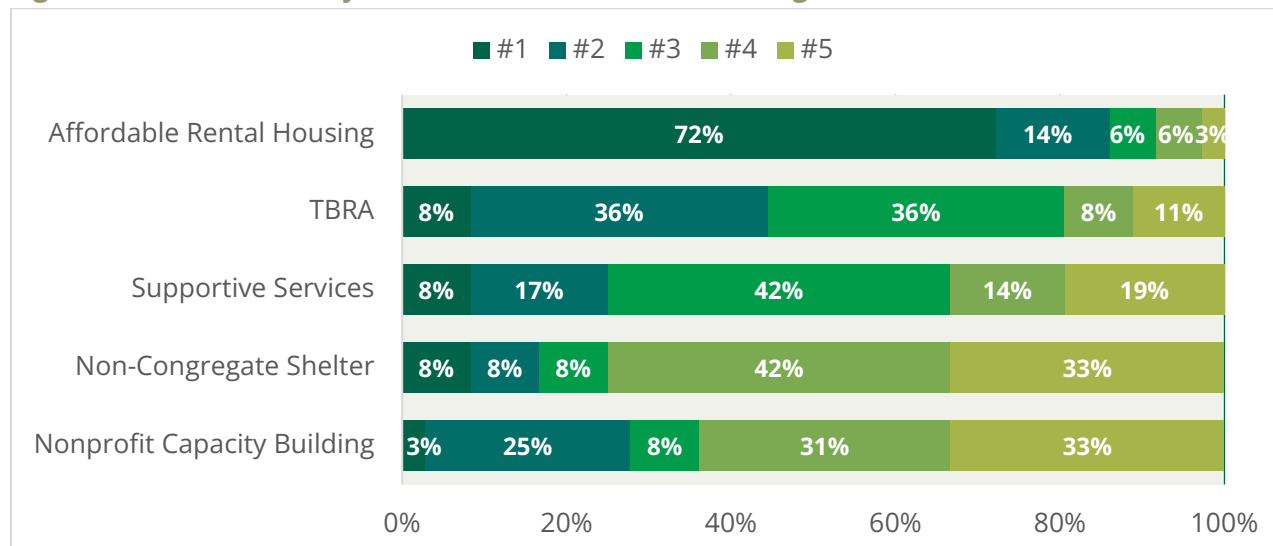


Table 2 outlines the average weighted score for each HOME-ARP activity, which provides a clear ranking of the activities based on respondents' prioritization. The average weighted score is calculated by assigning weights to each response option (i.e., a scale of 1 to 5) for the survey question, with higher weights assigned to higher scores. Higher average weighted scores indicate that respondents prioritized a HOME-ARP activity more. The average weighted scores confirm that respondents prioritized affordable rental housing the most, followed by tenant-based rental assistance, supportive services, non-profit capacity building, and then non-congregate shelter.

Table 2: Average Weighted Score of Prioritized HOME-ARP-Eligible Activities

Ranking Order	HOME-ARP-Eligible Activity	Average Weighted Score
#1	Affordable Rental Housing	4.47
#2	Tenant-Based Rental Assistance	3.22
#3	Supportive Services	2.81
#4	Non-Profit Capacity Building	2.33
#5	Non-Congregate Shelter	2.17

The survey also asked respondents to prioritize which supportive services are most needed for each HOME-ARP QP. The survey first presented a list of eligible supportive services and asked respondents to select which services were needed most for each QP. The survey did not include one-time financial assistance and short- and medium-term rental assistance. The survey then asked respondents to prioritize the services they had just selected for each population. The Appendix outlines the average weighted scores for each supportive service by QP.

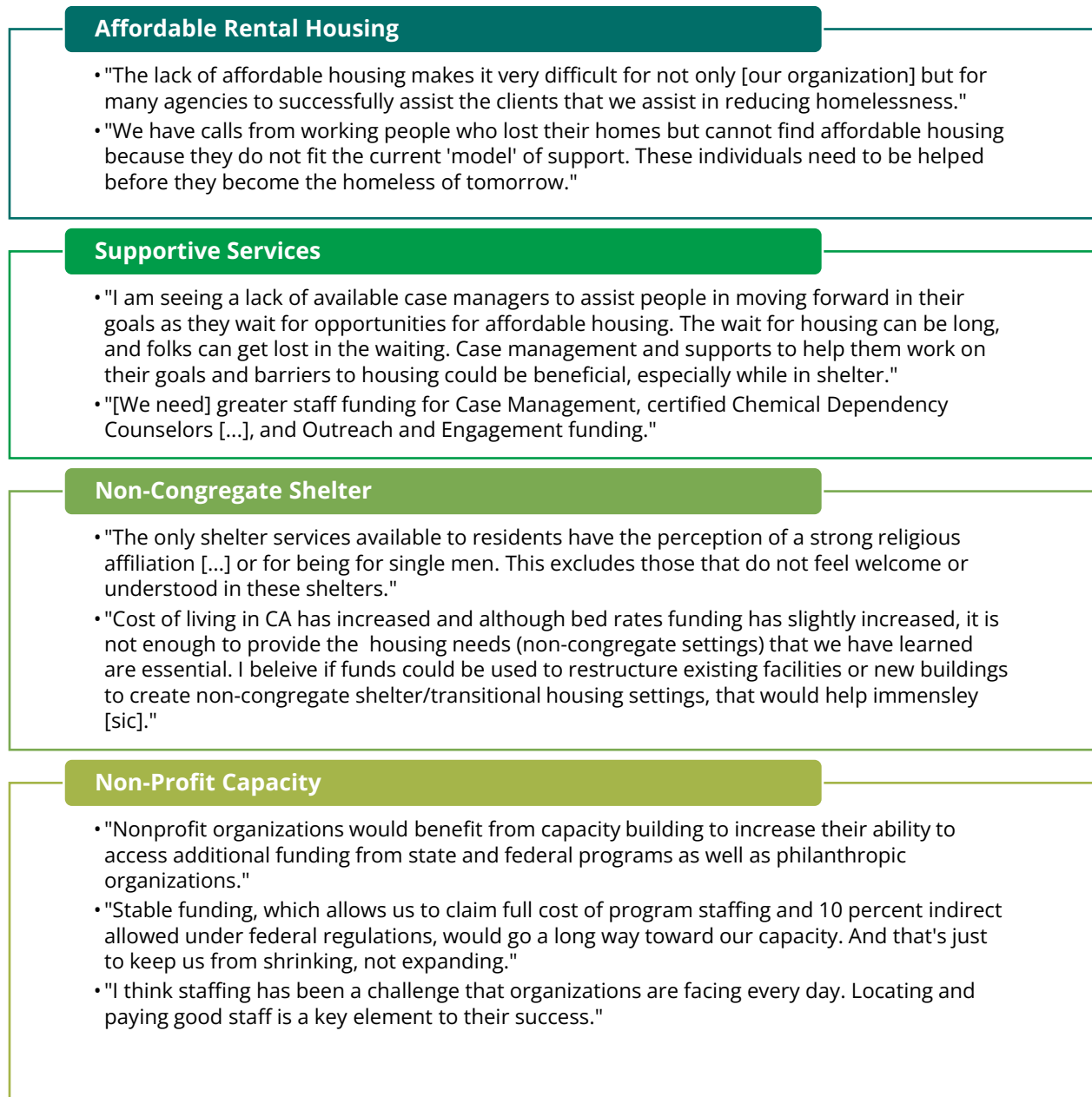
Figure 5 indicates that there was a significant overlap in the top supportive services identified for each QP. Notably, respondents identified case management as among the most needed supportive service for all four QPs. For individuals experiencing homelessness, the top-ranked supportive services included housing search assistance and counseling, case management, mental health services, substance use treatment services, and food assistance. For individuals at risk of homelessness, respondents identified case management, housing search assistance and counseling, mental health services, landlord/tenant liaison, and employment assistance and job training as most needed. For persons fleeing/attempting to flee, the top-ranked services included victim-survivor advocacy services, case management, childcare, legal services, and mental health services, while for other populations, the top-ranked services included case management, housing search assistance and counseling, landlord/tenant liaison, childcare, and legal services.

Figure 5: Prioritization of Supportive Services for Each QP

Rank	Individuals Experiencing Homelessness	Individuals At Risk of Homelessness	Persons Fleeing/ Attempting to Flee	Others At Greatest Risk
#1	Housing Search Assistance and Counseling	Case Management	Victim-Survivor Services	Case Management
#2	Case Management	Housing Search Assistance and Counseling	Case Management	Housing Search Assistance and Counseling
#3	Mental Health Services	Mental Health Services	Childcare	Landlord/Tenant Liaison
#4	Substance Use Treatment Services	Landlord/Tenant Liaison	Legal Services	Childcare
#5	Food Assistance	Employment Assistance and Job Training	Mental Health Services	Legal Services

Lastly, the survey offered respondents the opportunity to provide additional input on the housing, shelter, and service needs of the HOME-ARP QPs as well as comment on provider and system capacity. Figure 6 includes several notable quotations from survey respondents about each HOME-ARP-eligible activity. The selected quotations highlight the spectrum of perspectives among respondents on which eligible activities are most needed in Turlock and Stanislaus Urban County and what barriers pose challenges to serving the HOME-ARP QPs.

Figure 6: Selected Quotations From the Stakeholder Survey on Unmet Needs



Overall Trends and Themes Identified Through the Consultation Process

Across the consultation sessions and through the survey, stakeholders expressed the need for more affordable rental housing across all QPs. While stakeholders described a need for both short- and long-term housing solutions, they also underscored how the lack of affordable and available housing options for lower-income communities strains the existing housing and shelter inventory. Input from stakeholders made it clear that factors such as rising housing costs, inflation, lack of affordable housing options at different income levels, difficulty finding and keeping well-trained staff, limited resources and funding, difficulty using rental vouchers on the private market, and rises in evictions have led to housing, shelter, and service systems that are unable to meet the current level of need of the four QPs in Turlock and Stanislaus County.

Public Participation

Regulatory Requirements

Section V.B. of HUD [Notice: CPD-21-10](#) outlines the requirements for PJs in providing and encouraging citizen participation in the development of the HOME-ARP Allocation Plan. Prior to submitting the Allocation Plan to HUD, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP Allocation Plan for a period of at least 15 calendar days. During public engagement, PJs must abide by the requirements outlined in their Citizen Participation Plan and hold at least one public hearing during the development of the Allocation Plan and prior to submission to HUD. PJs must also disclose the jurisdiction's total HOME-ARP allocation to the public as well as the range of eligible activities the PJ could pursue with their HOME-ARP funding. Following the public hearing and comment period, PJs must summarize any comments received, describe efforts to broaden public engagement, and explain whether the PJ did not accept specific comments or recommendations and why.

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.

Table 3: Dates for Public Participation Events for HOME-ARP Allocation Plan

Event	Date(s)
Public Notice	February 23, 2023
Public Comment Period	February 24–March 13, 2023
Public Hearing	March 14, 2023

Describe the public participation process.

The Consortium sought feedback from the general public on the draft HOME-ARP Allocation Plan by coordinating a public hearing and comment period as well as publishing information on the HOME-ARP program to the City of Turlock's website. In addition, the Consortium published a public notice on the Allocation Plan, public comment period, and public hearing in English and Spanish in the Modesto Bee. The Consortium followed the requirements outlined in its Citizen Participation Plan during the development of the HOME-ARP Allocation Plan regarding broadening public participation and ensuring reasonable accommodations for persons with disabilities.

Describe efforts to broaden public participation.

The Consortium utilized several methods to broaden public participation in the development of the Consortium's HOME-ARP Allocation Plan. The Allocation Plan was shared with the Consortium's community partners via email and the plan was published on the City of Turlock's website to solicit comments from the public. In addition, the Consortium held a public comment period from February 24 to March 13, 2023 and a public hearing on March 14, 2023 to collect public input. To help raise awareness of HOME-ARP, the Consortium published a public notice describing the HOME-ARP planning process, public comment period, and public hearing date and time in the Modesto Bee in English and Spanish on February 23, 2023. Turlock's City Hall also published a social media post on Facebook on March 3 to announce the Allocation Plan, public comment period, and public hearing and then published another post on March 13 to remind the community about the public hearing.

Following the adoption of the HOME-ARP Allocation Plan, the Appendix was updated to include a summary of any comments/questions received and an explanation for why the Consortium did not accept specific comments or recommendations.

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

The Consortium received a total of thirteen comments on the draft Allocation Plan which are summarized and included in the Appendix. Many of the comments included multiple sub-comments providing suggestions for the use of HOME-ARP funding or questions asking for clarification about the HOME-ARP program, the funding distribution of the HOME-ARP allocation, and the Consortium's plans for implementation and project selection. There were two comments related to data provided in the Allocation Plan and several comments (or sub-comments) that expressed opinions unrelated to the HOME-ARP program or Allocation Plan. The Appendix summarizes these comments and includes the Consortium's response where applicable.

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

The Consortium accepted and considered all thirteen public comments/questions submitted during the public comment period and public hearing.

Needs Assessment and Gaps Analysis

Overview

The Needs Assessment and Gaps Analysis begins with a description of the regulatory requirements outlined in HUD Notice: CPD-21-10 followed by a description of the Consortium's data methodology. The plan then estimates the size and demographic composition of each QP and summarizes the unmet housing, shelter, and service needs facing these populations.

Regulatory Requirements

HOME-ARP grantees must complete a Needs Assessment and Gaps Analysis, which evaluates the size and demographic composition of the four HOME-ARP QPs within the jurisdiction's boundaries and assesses the unmet needs of these populations. These requirements are described in Section V.C.1 of HUD Notice: CPD-21-10. Required elements include analysis of the shelter, housing, and service needs of individuals experiencing sheltered and unsheltered homelessness; those currently at risk of homelessness; individuals and households requiring services or housing assistance to prevent homelessness; and those at greatest risk of housing instability or who live in unstable housing situations. The assessment must also identify existing gaps within the jurisdiction's shelter system, housing inventory, and service delivery system.

Furthermore, the assessment must include a description of the housing characteristics that are associated with housing instability and an increased risk of homelessness if the PJ is including these conditions under the HUD definition of "other populations." The assessment should also identify the PJ's priority needs for each QP and describe how the PJ determined these needs as well as the existing gaps in the grantee's shelter, housing, and service delivery systems.

Data Methodology

There are numerous challenges at play when it comes to gathering and analyzing data on the four HOME-ARP QPs. The definitions for each of the QPs are multifaceted and there is no single data source that neatly aligns with the entirety of each definition. PJs must therefore utilize existing data sources that line up with pieces of the HOME-ARP definitions. The implication of this is that estimates on the size, demographic composition, and needs facing each of the QPs are incomplete and underrepresent the true extent of needs facing individuals who make up these communities.

In addition to the misalignment between the QP definitions and existing data sources, there is also a spatial mismatch that limits the accuracy of the available data for the

purposes of HOME-ARP. Since HOME-ARP is administered by HOME PJs, the boundaries for HOME PJs represent the boundaries for HOME-ARP recipients.

For all QPs, the misalignment between data sources and boundaries is somewhat complicated by county and CoC jurisdictions, which do not align with HOME PJ boundaries. The Turlock-Stanislaus HOME Consortium includes the cities of Turlock, Ceres, Hughson, Newman, Oakdale, Patterson, Riverbank, and Waterford, as well as unincorporated areas of Stanislaus County. For unhoused and highly mobile households, city-level data may not be available or may not accurately describe the need. Where this is true, the Consortium used county- or CoC-level data.

Lastly, another significant data limitation is the inability to deduplicate individuals and households across data sources. For available data that align with pieces of the HOME-ARP QP definitions, many sources are aggregated and provide estimates for the number of individuals and households within specific groups such as income category. Other data provide individual-level information, which is useful for analyzing trends such as racial and ethnic disparities. These data may contain unique identifiers that can be used to determine whether an individual appears more than once in the same dataset; however, it is not possible to determine whether individuals in one dataset are present in another. Even when unique identifiers are available, they are usually unique to only one dataset. It is therefore not possible to determine the extent of overlap across data sources, or even across the QPs, which calls into question the accuracy of the estimates for the QPs.

Although there are significant limitations with existing data sources, available data sources can still provide useful information to better understand the needs facing the four QPs. In the development of the Turlock-Stanislaus HOME-ARP Allocation Plan, the Consortium gathered and analyzed data from state and federal sources, such as reports, assessments, datasets, and dashboards, to locate the most current information on the QPs. During the consultation process, the Consortium also asked stakeholders for recommendations on reports and datasets to gather additional resources for the Allocation Plan. Table 4 outlines the primary quantitative data sources the Consortium used to analyze the needs of each of the QPs.

Table 4: Primary Quantitative Data Sources by QP

HOME-ARP QP	Primary Quantitative Data Source
Individuals experiencing homelessness	<ul style="list-style-type: none"> CoC Homeless Management Information System/Point-in-Time count (2022) Stanislaus Homeless Alliance and Stanislaus Community System of Care, Regional Homeless Strategic Plan (2021) Stanislaus Community System of Care Homeless Point-in-Time County Summary (2022)

Individuals at risk of homelessness	<ul style="list-style-type: none"> • Comprehensive Housing Affordability Strategy (2015–2019) • McKinney-Vento EDFacts Initiative (school year 2019–2020) • Stanislaus Regional Housing Authority and Housing Authority of the City of Riverbank data (2021)
Persons fleeing/attempting to flee domestic violence, sexual assault, dating violence, stalking, or human trafficking	<ul style="list-style-type: none"> • CoC Homeless Management Information System/Point-in-Time count data (2022) • HAVEN client data (2022) • Center for Human Services client data (2022) • California Department of Justice, Domestic Violence-Related Calls for Service (2019–2021)
Other populations at risk of housing instability and homelessness	<ul style="list-style-type: none"> • Comprehensive Housing Affordability Strategy (2015–2019) • American Community Survey (2017–2021) • 2020–2024 Consolidated Plan

Throughout the rest of the Needs Assessment and Gaps Analysis, each section will specify which data sources the Consortium used to estimate the size, demographic composition, and needs facing each QP as well as discuss specific data limitations to keep in mind while interpreting data for HOME-ARP.

Understanding the QPs in Turlock and Stanislaus Urban County

The area has experienced considerable change over the past few years. The effects of the COVID-19 pandemic, rising inflation, and the increased cost of living have placed pressure on individuals and households across Turlock and the urban county. For the HOME-ARP QPs, the past couple of years have both exacerbated existing challenges and witnessed the influx of unprecedented government funding. The following sections present the most recent available data on the size and composition of each of the QPs as well as their unmet housing, shelter, and service needs.

Describe the size and demographic composition of the QPs within the PJ's boundaries.

Individuals Experiencing Homelessness

Turlock City and Stanislaus Urban County are located within the Stanislaus Community System of Care—the CoC for all of Stanislaus County—which is responsible for operating the local coordinated entry system, facilitating local Point-in-Time counts, and planning local homeless response strategies. The Consortium analyzed 2021 Homeless Management

Information System (HMIS) data on individuals identified as being within Turlock City and Stanislaus Urban County.

Given the misalignment between CoC and HOME PJ boundaries, as well as the fact that HMIS and Point-in-Time count data do not represent the entire universe of individuals experiencing homelessness, the estimates included in this report are likely undercounts of the true population experiencing homelessness. The HMIS data on individuals experiencing homelessness and fleeing domestic violence are excluded from the counts in this section and analyzed in the section of the Allocation Plan for the persons fleeing/attempting to flee QP per HOME-ARP requirements.

Based on 2021 HMIS data, an estimated 296 individuals experienced homelessness within Turlock and 4,096 individuals within Stanislaus Urban County. Table 5 includes demographic information for individuals experiencing homelessness in Turlock and in Stanislaus Urban County. In Turlock, 96 percent of individuals experiencing homelessness are male, 74 percent are White, and 37 percent are Hispanic. In Stanislaus Urban County, 47 percent are male, 71 percent are White, and 48 percent are Hispanic. Seventy-two percent of individuals experiencing homelessness in Turlock have disabling conditions and 60 percent are chronically homeless.¹ In Stanislaus Urban County, these numbers are 34 percent and 17 percent, respectively.

Table 5: Demographics of Individuals Experiencing Homelessness in Turlock and Stanislaus Urban County

Sex	Turlock (Total=296)		Stanislaus Urban County (Total=4,096)	
	#	%	#	%
Male	285	96%	1,913	47%
Female	11	4%	2,170	53%
Transgender, non-binary, or questioning	0	0%	13	0.3%

¹ According to HUD's definition, a chronically homeless individual is a homeless individual with a disability who lives in a place not meant for human habitation or resides in safe haven, an emergency shelter, or an institutional care facility. The individual must have been living in any of the above-described places either continuously for at least 12 months or on at least four separate occasions within the last three years. A chronically homeless family is a family where the head of the household is chronically homeless. This applies to adult heads of household and minor heads of household families.

Race/Ethnicity	Turlock		Stanislaus Urban County	
	#	%	#	%
White	220	74%	2,894	71%
Black/African American	34	11%	531	13%
American Indian/Native American	12	4%	89	2%
Asian/Asian-American	7	2%	52	1%
Native Hawaiian/Pacific Islander	1	0.3%	52	1%
Not Reported/Race Unknown	3	1%	10	0.2%
Multiracial	19	6%	468	11%
Hispanic (any race)	108	37%	1,979	48%
Age Group	Turlock		Stanislaus Urban County	
	#	%	#	%
Under 18	8	3%	1,683	41%
18-24	20	7%	408	10%
25-54	179	60%	1,456	36%
55 and over	89	30%	549	13%
Subpopulations	Turlock		Stanislaus Urban County	
	#	%	#	%
People with a disabling condition	212	72%	1,421	34%
Survivors of domestic violence	34	12%	613	14%
Veterans	16	5%	119	3%
Chronically homeless	176	60%	701	17%

Data sources: HMIS Data, 2021.

There is a much greater proportion of individuals experiencing homelessness that are children in the Urban County (41 percent) compared to Turlock (3 percent). HMIS analysis also indicated that approximately 2 percent of individuals experiencing homelessness in Turlock were members of a family household and 47 percent of individuals in Stanislaus Urban County were members of a family household, as shown in Table 6. This is likely due to most shelter beds in Turlock being adult-only beds and most shelter beds in the Urban County being family beds.

Additionally, it is important to note that CoC data may undercount family households since many homeless families double up with other households during periods of homelessness and will therefore not be included in HMIS data. For doubled-up households, data from the

U.S. Department of Education on student homelessness can shed light on the number of families living with other households. This data is explored in more detail for the individuals at risk of homelessness QP.

Table 6: Size of Households Experiencing Homelessness

Household Size (# people)	Turlock		Stanislaus Urban County	
	#	%	#	%
1	278	98%	1153	53%
2	5	2%	418	19%
3	0	0%	255	12%
4	2	0.7%	195	9%
5	0	0%	87	4%
6 or more	0	0%	57	3%
Total	285	100%	2,165	100%

Data source: HMIS Data, 2021.

Individuals With Disabilities

Table 7 provides demographic data on individuals experiencing homelessness with a disabling condition in 2021. In Turlock, 97 percent of homeless individuals with a disabling condition were male and 77 percent were White. In Stanislaus Urban County, 51 percent of homeless individuals with a disabling condition were female and 69 percent were White.

Table 7: Demographic Information of Homeless Individuals With a Disabling Condition

Sex	Turlock (n=216)		Stanislaus Urban County (n=1,552)	
	#	%	#	%
Male	210	97%	748	48%
Female	6	3%	791	51%
Transgender, non-binary, or questioning	0	0%	13	1%
Race/Ethnicity	Turlock		Stanislaus Urban County	
	#	%	#	%
American Indian/Native American	10	5%	52	3%
Asian/Asian American	4	2%	19	1%

Black/African American	20	9%	206	13%
Native Hawaiian/Pacific Islander	1	0.5%	18	1%
Multiracial	12	6%	175	11%
White	167	77%	1,073	69%
Hispanic (any race)	73	34%	582	38%
Age Group	Turlock		Stanislaus Urban County	
	#	%	#	%
18-24	16	7%	153	10%
25-34	46	21%	229	15%
35-44	44	20%	276	18%
45-54	36	17%	270	17%
55 or above	73	34%	406	26%
Household Type	Turlock		Stanislaus Urban County	
	#	%	#	%
Single adult	211	98%	836	54%
Household with children	1	0.5%	206	13%
Household without children	0	0%	117	8%

Data source: HMIS Data, 2021.

Chronic Homelessness

Another theme from the HMIS data is that there was a significant chronically homeless population in Turlock and Stanislaus Urban County. In 2021, there were 180 individuals who were chronically homeless at program enrollment in Turlock and 760 individuals who were chronically homeless at program enrollment in Stanislaus Urban County. This represents 21 percent of the Consortium's homeless population.

Table 8 provides a demographic overview of the chronically homeless population. In Turlock, nearly all chronically homeless individuals were male, 78 percent were White, and 31 percent were Hispanic. In Stanislaus Urban County, 53 percent of chronically homeless individuals were male, 67 percent were White, and 33 percent were Hispanic. Most chronically homeless individuals were in single-person households.

Table 8: Demographic Information of Chronically Homeless Individuals in Turlock and Stanislaus Urban County

Sex	Turlock (n=180)		Stanislaus Urban County (n=760)	
	#	%	#	%
Male	176	98%	402	53%
Female	4	2%	352	46%
Transgender, non-binary, or questioning	0	0%	4	0.5%
Race/Ethnicity	Turlock		Stanislaus Urban County	
	#	%	#	%
American Indian/Native American	7	4%	27	4%
Asian/Asian American	3	2%	8	1%
Black/African American	18	10%	122	16%
Native Hawaiian/Pacific Islander	1	0.6%	8	1%
Multiracial	10	6%	86	11%
White	141	78%	506	67%
Hispanic (any race)	56	31%	249	33%

Age Group	Turlock		Stanislaus Urban County	
	#	%	#	%
18–24	8	4%	60	8%
25–34	34	19%	89	12%
35–44	36	20%	130	17%
45–54	37	21%	141	19%
55 or above	65	36%	23	3%
Household Type	Turlock		Stanislaus Urban County	
	#	%	#	%
Single adult	178	99%	461	61%
Household with children	1	0.6%	70	9%
Household without children	0	0%	39	5%

Data source: HMIS Data, 2021.

Veterans Experiencing Homelessness

Another subpopulation among individuals experiencing homelessness is veterans. In 2021, less than 1 percent of homeless individuals were veterans. Table 9 shows that most homeless veterans were over age 55, male, and in single-adult households.

Table 9: Demographic Information of Veterans Experiencing Homelessness

Sex	Turlock (n=16)		Stanislaus Urban County (n=125)	
	#	%	#	%
Male	16	100%	103	82%
Female	0	0%	22	18%
Transgender, non-binary, or questioning	0	0%	0	0%

Race/Ethnicity	Turlock		Stanislaus Urban County	
	#	%	#	%
American Indian/Native American	2	13%	7	6%
Asian/Asian American	0	0%	1	1%
Black/African American	3	19%	22	18%
Native Hawaiian/Pacific Islander	0	0%	3	2%
Multiracial	0	0%	6	5%
White	11	69%	86	69%
Hispanic (any race)	3	19%	29	23%
Age Group	Turlock		Stanislaus Urban County	
	#	%	#	%
18-24	0	0%	3	2%
25-34	0	0%	10	8%
35-44	3	19%	23	18%
45-54	2	13%	13	10%
55 or above	11	69%	76	61%
Household Type	Turlock		Stanislaus Urban County	
	#	%	#	%
Single adult	16	100%	90	72%
Household with children	0	0%	7	6%
Household without children	0	0%	0	0%

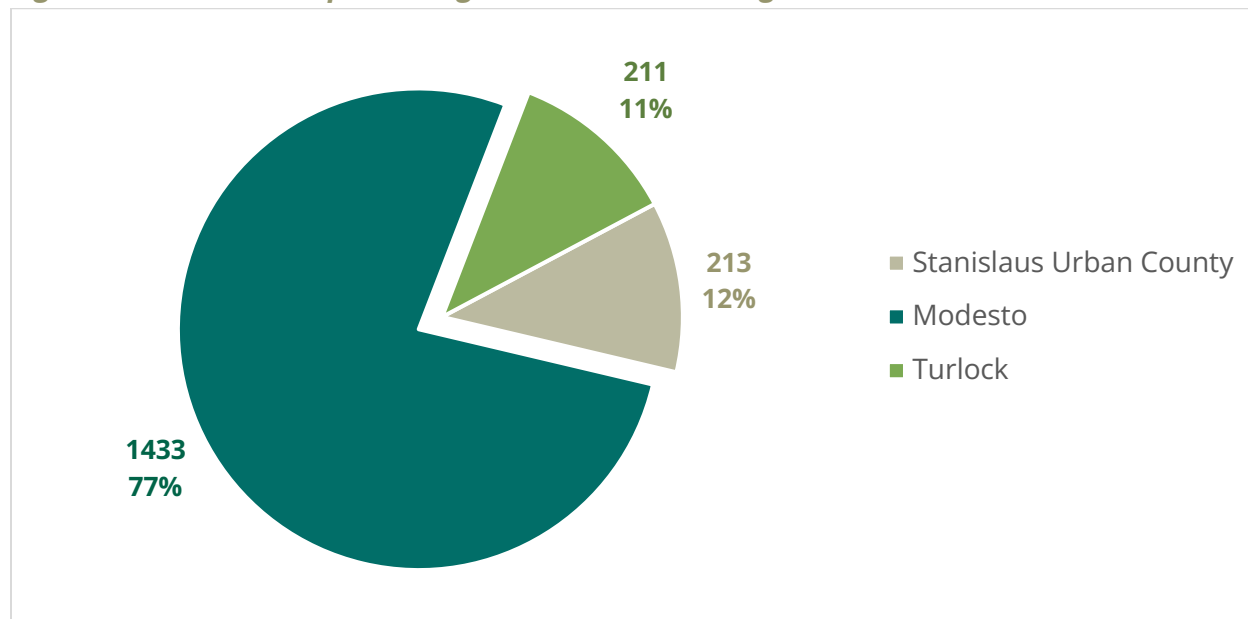
Data source: HMIS Data, 2021.

Point-in-Time Count of Sheltered and Unsheltered Population

In February 2022, Stanislaus Community System of Care completed the annual Point-in-Time count of people experiencing sheltered and unsheltered homelessness. They identified 1,857 individuals in the county, a decrease from prior years. However, the Community System of Care offers multiple reasons that this decrease may not be accurate, including colder than usual weather on the day of the unsheltered count, fewer volunteers to assist with the count, and several homeless encampment sweeps in the days before the count. The 1,857 individuals counted belonged to 1,607 households and included 183 children and 92 transition-age youth (18–24). Sixty-five percent of individuals were male and 25 percent were female. Forty-nine percent were sheltered and 51 percent were unsheltered. There were 493 individuals experiencing chronic homelessness.

As shown in Figure 7, 23 percent of individuals counted were in the cities of Turlock (211), Empire (70), Patterson (55), Oakdale (26), Riverbank (18), Ceres (15), Newman (12), Waterford (10), Keyes (4), Hughson (1), Crows Landing (1), and Westley (1).

Figure 7: Individuals Experiencing Homelessness During 2022 Point-in-Time Count



Data source: HMIS Data, 2021.

Individuals at Risk of Homelessness

To estimate the size and demographic composition of individuals at risk of homelessness, the Consortium gathered and analyzed data from several sources that provide information on different facets of this QP. These include the 2015–2019 five-year estimates of the Comprehensive Housing Affordability Strategy (CHAS) data, data on student homelessness from the McKinney-Vento EDFacts Initiative for school year 2019–2020, and program data

from clients served by the Stanislaus Regional Housing Authority and Housing Authority of the City of Riverbank in 2021.

CHAS Data on Extremely Low-Income Households

The first data source, CHAS, includes information on the types of housing problems and needs facing households at different income levels in a geographic area. For the HOME-ARP Allocation Plan, data from CHAS align with parts of the HOME-ARP definition for individuals at risk of experiencing homelessness that earn less than 30 percent of the area median income (AMI) and are experiencing one or more of the four severe housing problems captured in CHAS data. The four severe housing problems include:

- Housing units lack complete kitchen facilities.
- Housing units lack complete plumbing facilities.
- Households are severely overcrowded (defined as having more than 1.5 people per room).
- Households are severely cost-burdened (defined as spending over 50 percent of monthly income on housing costs).

Households earning less than 30 percent AMI, also referred to as extremely low-income (ELI) households, have an increased risk of homelessness, which is further compounded for households experiencing one or more of the four severe housing problems.

Countywide, 2019 CHAS data indicates that there were 20,435 ELI households across Stanislaus County, of which 14,430 were renters and 6,005 were owners. When excluding the City of Modesto, the Consortium was home to 12,125 of these ELI households and 8,230 were renters while 3,895 were owners. Overall, 8,200 ELI households in the Consortium, or 68 percent of all ELI households, experienced one or more of the four severe housing problems. The most common severe housing problem was severe housing cost burden with 7,875 households paying more than half of their income on housing costs. Table 10 outlines the number of ELI households with severe housing problems in Stanislaus County, Turlock, and Stanislaus Urban County by tenure. The data indicate that a larger percentage of ELI households were renters in Turlock compared to Stanislaus Urban County; however, the percentages of renters and owners who were severely cost-burdened were nearly the same between the two jurisdictions.

Table 10: ELI Households With Severe Housing Problems in Stanislaus County by Tenure and Jurisdiction

ELI Renter Households	Countywide	Turlock	Stanislaus Urban County*
Severely cost-burdened	10,080	1,765	3,925
Severely overcrowded	310	35	95
Incomplete kitchen/plumbing	275	65	55
Total ELI renter households	14,430	2,580	5,650
ELI Owner Households	Countywide	Turlock	Stanislaus Urban County
Severely cost-burdened	3,460	530	1,655
Severely overcrowded	85	4	26
Incomplete kitchen/plumbing	105	0	90
Total ELI owner households	6,005	945	2,950
Total ELI Households	Countywide	Turlock	Stanislaus Urban County
Severely cost-burdened	13,540	2,295	5,580
Severely overcrowded	395	39	121
Incomplete kitchen/plumbing	380	65	145
Total ELI households	20,435	3,525	8,600

Data source: CHAS, 2019.

**Note: Stanislaus Urban County refers to the entire county minus the cities of Turlock and Modesto.*

Table 11 includes a breakdown of ELI renter households by race and ethnicity in Turlock and Stanislaus Urban County and indicates whether the household experienced one or more of the four severe housing problems. CHAS data uses the race and ethnicity of the head of the household who provided data on behalf of their household as a proxy for the race and ethnicity of the entire household. For Turlock, the data indicate that 1,795 ELI renter households experienced at least one severe housing problem. Of these households, 48 percent were White, 39 percent identified as Hispanic (of any race), 6 percent were Black/African American, 4 percent were Asian, and 1 percent were Pacific Islander. For Stanislaus Urban County, 4,140 ELI renter households experienced one or more severe housing problems, of which 60 percent identified as Hispanic (of any race), 34 percent were White, 3 percent were Black, and 3 percent were Asian. For both Turlock and the Urban County, the sample sizes of ELI American Indian/Alaska Native and Pacific Islander renter households were quite small and therefore may not accurately represent the housing needs of either population.

Table 11: Severe Housing Problems by Race/Ethnicity Among ELI Renter Households

Race/Ethnicity	Turlock ELI Renter Households			Stanislaus Urban County ELI Renter Households		
	# With One or More Severe Housing Problems	# Without Severe Housing Problems	Total ELI Renter Households	# With One or More Severe Housing Problems	# Without Severe Housing Problems	Total ELI Owner Households
American Indian or Alaska Native, non-Hispanic	0	45	45	0	0	0
Asian alone, non-Hispanic	75	10	85	115	15	130
Black or African American, non-Hispanic	115	55	170	110	25	135
Pacific Islander alone, non-Hispanic	15	0	15	10	0	10
White alone, non-Hispanic	865	495	1,360	1,390	880	2,270
Hispanic, any race	705	125	830	2,465	505	2,970
Total	1,795	785	2,580	4,140	1,515	5,655

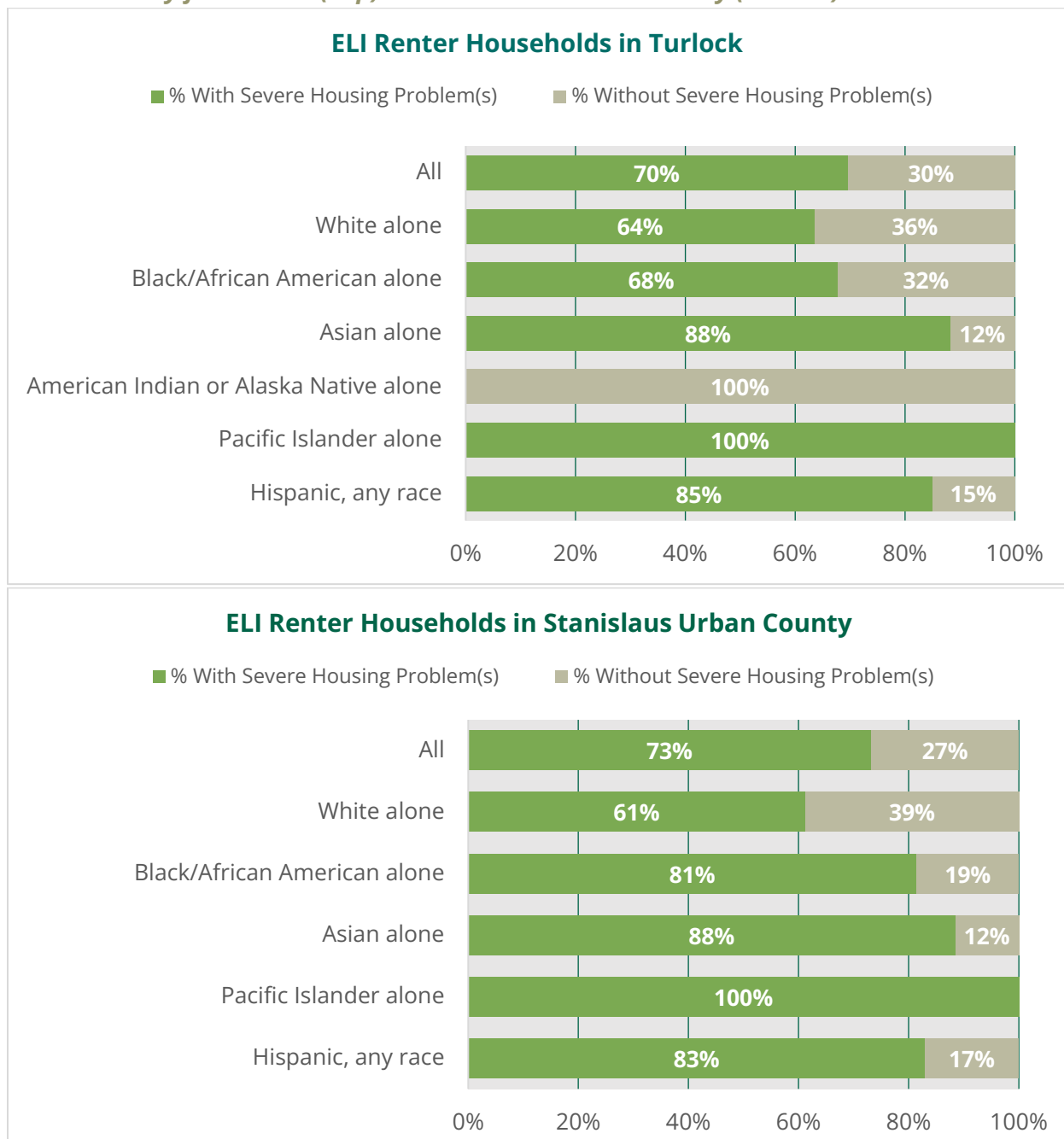
Data source: CHAS, 2019.

Figure 8 depicts which race and ethnicity may be experiencing disproportionately greater need in Turlock and Stanislaus Urban County by comparing the share of ELI renter households with at least one severe housing problem to the share of those who are not experiencing a severe housing problem by race and ethnicity. Disproportionately greater need occurs if a specific race or ethnicity at a given income level experiences housing problems at a rate that is at least 10 percentage points higher than the income level as a whole.

Figure 8 indicates that among ELI renter households in Turlock, 70 percent of all households are experiencing one or more severe housing problems. When disaggregated by race and ethnicity, ELI American Indian/Alaska Native renter households have the lowest share of households with severe housing problems at 0 percent while ELI Pacific Islander renter households have the highest share at 100 percent. Since both of the sample sizes for these populations are low, these estimates may not accurately reflect the housing needs of these households. Among the remaining households, there are two groups disproportionately impacted by severe housing problems in Turlock: ELI Asian renter households and ELI Hispanic renter households. Since the rate of ELI renter households across the City experiencing one or more severe housing problems is 70 percent, and 88 percent of ELI Asian renter households and 85 percent of ELI Hispanic renter households have at least one severe housing problem, these two populations are disproportionately impacted.

For Stanislaus Urban County, Figure 8 indicates that 73 percent of all households are experiencing one or more severe housing problems. The data show that 88 percent of ELI Asian and 83 percent of ELI Hispanic renter households have at least one severe housing problem, which indicates that these two populations are disproportionately impacted. Although the data shows that 100 percent of ELI Pacific Islander renter households were experiencing a severe housing problem, there were only ten households included in the CHAS data, which suggests that the estimates for this population may not be accurate for this group.

Figure 8: Share of ELI Renter Households With and Without Severe Housing Problems by Race/Ethnicity for Turlock (Top) and Stanislaus Urban County (Bottom)



Data source: CHAS, 2019.

CHAS data from 2019 also indicate that among ELI severely cost-burdened households, the three most common household types in both Turlock and Stanislaus Urban County were small family, elderly non-family, and other (non-elderly, non-family) households. Table 12 includes a breakdown of household types included in CHAS data. Families are defined as

related individuals living together in the same household. CHAS data include the following household types:

- **Small families:** Two- to four-person households.
- **Large families:** Five or more people.
- **Elderly families:** Two people, with either or both aged 62 and over.
- **Elderly non-family:** Unrelated individuals, over the age of 62.
- **Other (non-elderly, non-family):** Could include unrelated individuals living together, or people living alone, who are under the age of 62.

In 2019, there were 1,045 ELI severely cost-burdened small families, 560 other (non-elderly, nonfamily) households, and 490 elderly non-families in Turlock. Twenty-three percent of ELI and severely cost-burdened households in Turlock were owners while 77 percent were renters. In comparison, among ELI and severely cost-burdened households in Stanislaus Urban County, 30 percent were owners and 70 percent were renters. When disaggregated by household type, there was considerable variation. In Turlock and Stanislaus Urban County, large families had the lowest percentage of owners while elderly households tended to witness some of the highest owner rates. Differences in housing tenure for ELI severely cost-burdened households have implications for which forms of housing assistance would be most beneficial for those unable to afford housing costs.

Table 12: Household Types of ELI Households With Severe Housing Cost Burden

Household Type	Turlock ELI Households With Severe Housing Cost Burden			Stanislaus Urban County ELI Households With Severe Housing Cost Burden		
	Owners	Renters	Total	Owners	Renters	Total
Elderly family	4	145	149	406	150	556
Small family	210	835	1,045	385	1,785	2,170
Large family	0	45	45	110	800	910
Elderly non-family	190	300	490	470	530	1,000
Other (non-elderly, non-family)	125	435	560	290	665	955
Total	530	1,765	2,295	1,655	3,925	5,580

Data source: CHAS, 2019.

Lastly, Table 13 provides estimates on the number of ELI households with one or more housing problems that include an individual with a disability. CHAS data only provide information for renter and total households, and it is not possible to calculate the number of owner households using this data because it is unknown whether any households were excluded from the analysis if, for example, housing cost burden could not be computed.

The data indicate that the most prevalent type of disability among ELI households with one or more housing problems in Turlock and Stanislaus Urban County was for ambulatory limitations followed by hearing or vision impairments. While it is unclear the extent to which these households overlap, the data suggest that a large number of ELI renter households in Turlock and Stanislaus Urban County would benefit from affordable housing options that are accessible to individuals with self-care needs or physical limitations.

Table 13: Disability Types of ELI Households With Housing Problems

Disability Type	Turlock ELI Households With Housing Problems		Stanislaus Urban County ELI Households With Housing Problems	
	Renters	Total	Renters	Total
Household member has a hearing or vision impairment	560	825	780	1,165
Household member has an ambulatory limitation	705	1,000	930	1,550
Household member has a cognitive limitation	360	615	790	1,070
Household member has a self-care or independent living limitation	510	670	800	1,150
Household member has none of the above limitations	1,060	1,425	2,910	4,070

Data source: CHAS, 2019.

Student Homelessness

In addition to analyzing CHAS data, the Consortium collected data from the U.S. Department of Education on student homelessness for school year 2019–2020 for enrolled students in pre-K through grade 12. [Data from the EDFacts Initiative](#) includes information

collected by local educational agencies on the number of enrolled students experiencing homelessness and provides insight into households with enrolled students who may not meet the HOME-ARP definition for homeless but would be considered at risk of homelessness. This is because the definition of homelessness used by the Department of Education is broader than the definition used by HUD. Specifically, homeless persons are defined as individuals lacking a fixed, regular, and adequate nighttime residence and include:

- Children and youth who are sharing housing with others due to loss of housing, an economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds because they lack alternative accommodations; are living in emergency or transitional shelters; or were abandoned in hospitals.
- Children and youth whose primary nighttime residence is a public or private place not meant for human habitation.
- Children and youth who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings.
- Migratory children who qualify as homeless because the children are living in the circumstances described above.

Although EDFacts data provide useful information to estimate the number of enrolled students experiencing homelessness, it is important to note several factors that have likely influenced the accuracy of the data. In order to comply with federal laws to protect the privacy of student education records, data elements in the EDFacts data are suppressed if the count of students is low. This is to prevent data users from identifying students using demographic information when counts are low and suggests that counts may under-represent the true extent of student homelessness. Another factor influencing data collection on student homelessness was the COVID-19 pandemic. The 2019–2020 school year witnessed the beginning of the pandemic and the transition to online learning for many across the country. For students experiencing homelessness, the shift to online learning may have prevented some students from staying connected to their schools. At the same time, the pandemic also led to new sources of federal funding including resources to help schools identify and assist homeless students. This likely contributed to a reduction in the number of homeless students during the school year. It is unclear the full extent to which these factors have impacted the accuracy of the EDFacts data for the 2019–2020 school year.

Table 14 summarizes the EDFacts data from the 2019–2020 school year for students enrolled at schools within 23 of the County's school districts. Stanislaus County has 25 school districts, two of which, Modesto City Elementary and Modesto City High, primarily serve the City of Modesto. While it is possible that these two districts serve students living

outside of Modesto, it is not possible to determine where students live based on the ED Facts data alone.

Table 14 indicates that there were 1,201 enrolled students experiencing homelessness in Turlock and Stanislaus Urban County, representing 2 percent of all enrolled students in the Consortium. Of these students, 62 percent were Hispanic/Latino, 18 percent were White, 6 percent were Black/African American, 4 percent were Asian, 2 percent were multiracial, and 1 percent were Native Hawaiian/Pacific Islander. When compared to the general student population as a whole, the data indicate that there are racial disparities among enrolled students experiencing homelessness. Specifically, while Black/African American students comprise 2 percent of the general student population, 6 percent of students experiencing homelessness are Black/African American. Conversely, while White students make up 26 percent of the general student population, they account for 18 percent of students experiencing homelessness.

Table 14: Race/Ethnicity of Enrolled Students Experiencing Homelessness Compared to the Total Student Population

Enrolled Student Race/Ethnicity	Enrolled Students Experiencing Homelessness		General Student Population	
	# Homeless	% Total Homeless	# Students	% Total
American Indian or Alaska Native	0	0%	496	1%
Asian	49	4%	3,662	5%
Black/African American	71	6%	1,645	2%
Native Hawaiian or Pacific Islander	16	1%	511	1%
Two or more races	25	2%	2,447	3%
White	212	18%	18,808	26%
Hispanic/Latino*	739	62%	45,181	62%
Unknown/not reported	89	7%	7	0.01%
Total	1,201	100%	72,757	100%

Data sources: 1. ED Facts Initiative, school year 2019–2020 (homeless students); 2. Common Core Data, school year 2019–2020 (total students).

**Note: Data from EDFacts and Common Core Data classify Hispanic/Latino as a race category, unlike CHAS data which considers Hispanic as an ethnicity that is a distinct category from race groups.*

Table 15 provides additional information on subpopulations among students experiencing homelessness as well as the places of nighttime residence. Of the 1,201 students experiencing homelessness, the largest subpopulation was English learners, who comprised 27 percent of students experiencing homelessness. There were 149 students experiencing homelessness (12 percent) who had one or more disabilities, 26 unaccompanied youths (2 percent), and 39 migratory students (3 percent). In terms of nighttime residence, the data indicate that 73 percent of homeless students were doubled up with another household, 13 percent resided in a hotel or motel, 5 percent stayed in a shelter or transitional housing, and 2 percent were unsheltered.

It is important to note that data on places of nighttime residence and student subpopulations was suppressed for several school districts, which suggests that the estimates in Table 15 are undercounts for each category. For example, the data for children with one or more disabilities was suppressed for nine school districts and the data for students residing in shelters or transitional housing was suppressed for six school districts.

For the data that is available, it appears that most students experiencing homelessness rely on doubling up with other households and fewer households reside in shelters, transitional housing, or unsheltered situations such as cars, parks, public spaces, or other places not meant for human habitation. While it is not possible to determine the unmet need for shelter and housing programs of student households using the EDFacts data alone, this data is useful for understanding where students experiencing homelessness reside at night.

Table 15: Students Experiencing Homelessness by Subpopulation

Subpopulations	Consortium School Districts	
	# Homeless Students	% Total
Children with one or more disabilities	149	12%
Limited English proficiency	321	27%
Unaccompanied youth	26	2%
Migratory students	39	3%

Nighttime Residence	Consortium School Districts	
	# Homeless Students	% Total
Doubled up with another household	876	73%
Hotel or motel	151	13%
Shelters and transitional housing	58	5%
Unsheltered	19	2%
Unknown	97	8%

Data source: EDFacts Initiative, school year 2019–2020.

Public Housing Authorities Data on Individuals Assisted in Stanislaus County

The Consortium also analyzed data from HUD’s Picture of Subsidized Households on the households receiving rental assistance or residing in public housing operated by the Stanislaus Regional Housing Authority or the Housing Authority of the City of Riverbank. The Stanislaus Regional Housing Authority oversees a Housing Choice Voucher program and public housing while the Housing Authority of the City of Riverbank only manages public housing.

In 2021, a total of 13,161 individuals comprising 5,475 households were assisted by the two housing authorities. Table 16 provides a demographic breakdown of these households using the data collected on the head of the household, or when specified, the spouse/co-head of the household. Among all heads of households, 51 percent identified as White, 32 percent were Hispanic/Latino, and 11 percent were Black/African American. The data also indicate that across both housing authorities, 39 percent of households were led by someone over age 62 and 32 percent were led by a single female head of household with at least one child under the age of 18. In addition, of the assisted households, 48 percent had incomes below 30 percent AMI and 85 percent had incomes below 50 percent AMI.

The data also show that the most common age cohort for heads of households at the Stanislaus Regional Housing Authority was 25 to 49, which accounted for 40 percent of households. At the Housing Authority of the City of Riverbank, 63 percent of heads of households were over age 62, of whom half had a disability. Lastly, the data suggest that there were 1,024 households (19 percent) at the Stanislaus Regional Housing Authority that were over-housed or living in housing units where there were more bedrooms available than people in the household. This suggests that there is some mismatch between the size of available housing units and the size of households currently assisted by the housing authority, whether through rental assistance or public housing. Additional data would be needed to determine what size units are most in demand among assisted households.

Table 16: Demographic Information of Households Assisted by Public Housing Authorities

Age Group of Head of Household	Stanislaus Regional Housing Authority (Total=5,389)		Housing Authority of Riverbank (Total=86)	
	#	%	#	%
24 years or less	54	1%	0	0%
25 to 49 years	2,156	40%	18	21%
51 to 60 years	1,078	20%	14	16%
62 or more years	2,102	39%	54	63%
Race/Ethnicity of Head of Household*	Stanislaus Regional Housing Authority (Total=5,389)		Housing Authority of Riverbank (Total=86)	
	#	#	#	%
Asian or Pacific Islander	269	5%	2	2%
Black/African American	593	11%	2	2%
Multiracial	54	1%	0	0%
Native American	54	1%	3	3%
Other Race or Not Specified	1,671	31%	43	50%
White	2,748	51%	37	43%
Hispanic	1,724	32%	42	49%
Household Income Category	Stanislaus Regional Housing Authority (Total=5,389)		Housing Authority of Riverbank (Total=86)	
	#	#	#	%
0-30% AMI	2,587	48%	50	58%
0-50% AMI	4,581	85%	77	89%
Household Unit Size	Stanislaus Regional Housing Authority (Total=5,389)		Housing Authority of Riverbank (Total=86)	
	#	#	#	%
0-1 Bedrooms	1,724	32%	57	66%
2 Bedrooms	2,156	40%	19	22%
3+ Bedrooms	1,509	28%	10	12%
Any unit size and over-housed (more bedrooms than people)	1,024	19%	1	1%

Household Subpopulations (Households may fall in more than one category)	Stanislaus Regional Housing Authority (Total=5,389)		Housing Authority of Riverbank (Total=86)	
	#	#	#	%
Households with two adults and one or more children under 18	593	11%	13	15%
Households with one adult and one or more children under 18	1,509	28%	6	7%
Female-headed households with one or more children under 18	1,724	32%	8	9%
Head of household or spouse is under age 62 and has a disability	1,118	34%	11	34%
Head of household or spouse is age 62 or over and has a disability	1,576	75%	28	52%

Data source: Picture of Subsidized Households, 2021.

**Note: Publicly available data on race/ethnicity does not provide all available race and ethnicities recorded by housing authorities, so the "Other Race or Not Specified" row includes households for which there is no race data available. "Hispanic" is categorized as an ethnicity that is a distinct category from race.*

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

To estimate the size and demographic composition of persons fleeing or attempting to flee domestic violence, sexual assault, dating violence, stalking, and human trafficking, the Consortium gathered and analyzed data from several sources, as there is no single data source that aligns with all components of this QP definition.

As with other data sources used for the HOME-ARP Allocation Plan, it is not possible to deduplicate across multiple sources to estimate the number of unique individuals in a QP. In addition, data on individuals experiencing domestic violence, sexual assault, dating violence, stalking, and human trafficking is notoriously difficult to locate, for several reasons. For one, individuals who experience these types of traumas may not report incidents to law enforcement or other reporting agencies for fear of retaliation from perpetrators, not being believed, losing their housing, being shamed, or other potential repercussions. In other cases, individuals, advocates, and service providers may take intentional steps to limit publicly available information on individuals who have experienced such trauma in order to protect their privacy and increase safety. These data limitations imply that estimates likely represent a fraction of the true population experiencing domestic violence, sexual assault, dating violence, stalking, and human

trafficking in Turlock and Stanislaus Urban County. Therefore, for the HOME-ARP Allocation Plan, the Consortium pieced together various data sources to best estimate the size and demographic composition of individuals in this group.

Individuals Experiencing Homelessness Who Are Fleeing Domestic Violence

HMIS data from 2021 provides additional insight into the demographic composition of individuals who were experiencing both domestic violence and homelessness. In calendar year 2021, 38 individuals experiencing homelessness in Turlock and 832 in Stanislaus Urban County self-reported that they had experienced domestic violence. Four individuals experiencing homelessness in Turlock and 219 in Stanislaus Urban County indicated that they were fleeing domestic violence at the time of program enrollment. Tables 17 and 18 outline the demographic composition for each group and indicates that the sex, age, and race/ethnicity breakdown was similar for survivors of domestic violence and those fleeing domestic violence. The extent of overlap between survivors and those fleeing is unknown with the data provided.

It should be noted that the victim service providers are prohibited from using HMIS, so all individuals served in the HAVEN shelter (15 beds) and transitional housing programs (22 beds) are excluded from the data set. Other data indicate that individuals served by HAVEN are predominantly female, White, and Hispanic with a wide range of age groups represented.

Table 17: Demographic Information of Individuals Experiencing Homelessness With Self-Reported Domestic Violence Experience in Turlock

Sex	TURLOCK			
	Self-Reported Survivors of Domestic Violence (Total=38)		Self-Reported Fleeing Domestic Violence (Total=4)	
	# Individuals	% Total	# Individuals	% Total
Male	36	95%	4	100%
Female	2	5%	0	0%
Transgender, non-binary, or questioning	0	0%	0	0%

Data not collected	0	0%	0	0%
Race/Ethnicity	Self-Reported Survivors of Domestic Violence		Self-Reported Fleeing Domestic Violence	
	# Individuals	% Total	# Individuals	% Total
American Indian/Native American	2	5%	1	25%
Asian/Asian American	0	0	0	0
Black/African American	7	18%	1	25%
Native Hawaiian/Pacific Islander	0	0	0	0
Multiracial	0	0	0	0
White	29	76%	2	50%
Race data not collected	0	0	0	0
Hispanic (any race)	7	18%	2	50%
Age Group	Self-Reported Survivors of Domestic Violence		Self-Reported Fleeing Domestic Violence	
	# Individuals	% Total	# Individuals	% Total
18–24	3	8%	0	0%
25–34	10	26%	1	25%
35–44	9	24%	1	25%
45–54	8	21%	2	50%
55 or above	8	21%	0	0

Table 18: Demographic Information of Individuals Experiencing Homelessness with Self-Reported Domestic Violence Experience in Stanislaus County

STANISLAUS COUNTY				
Sex	Self-Reported Survivors of Domestic Violence (Total=832)		Self-Reported Fleeing Domestic Violence (Total=219)	
	# Individuals	% Total	# Individuals	% Total
Male	152	18%	16	7%
Female	674	81%	200	91%
Transgender, non-binary, or questioning	6	Less than 1%	3	1%
Data Not Collected	0	0	0	0
Race/Ethnicity	Self-Reported Survivors of Domestic Violence		Self-Reported Fleeing Domestic Violence	
	# Individuals	% Total	# Individuals	% Total
American Indian/Native American	37	4%	8	4%
Asian/Asian American	8	1%	3	1%
Black/African American	112	14%	26	12%
Native Hawaiian/Pacific Islander	15	2%	1	Less than 1%
Multiracial	80	10%	23	11%
White	613	73%	155	71%
Race data not collected	5	Less than 1%	3	1%

Hispanic (any race)	318	38%	92	42%
Age Group	Self-Reported Survivors of Domestic Violence		Self-Reported Fleeing Domestic Violence	
	# Individuals	% Total	# Individuals	% Total
18–24	111	13%	29	13%
25–34	211	25%	63	29%
35–44	244	29%	68	31%
45–54	153	18%	36	16%
55 or above	143	17%	23	11%

Data source: HMIS data, 2021.

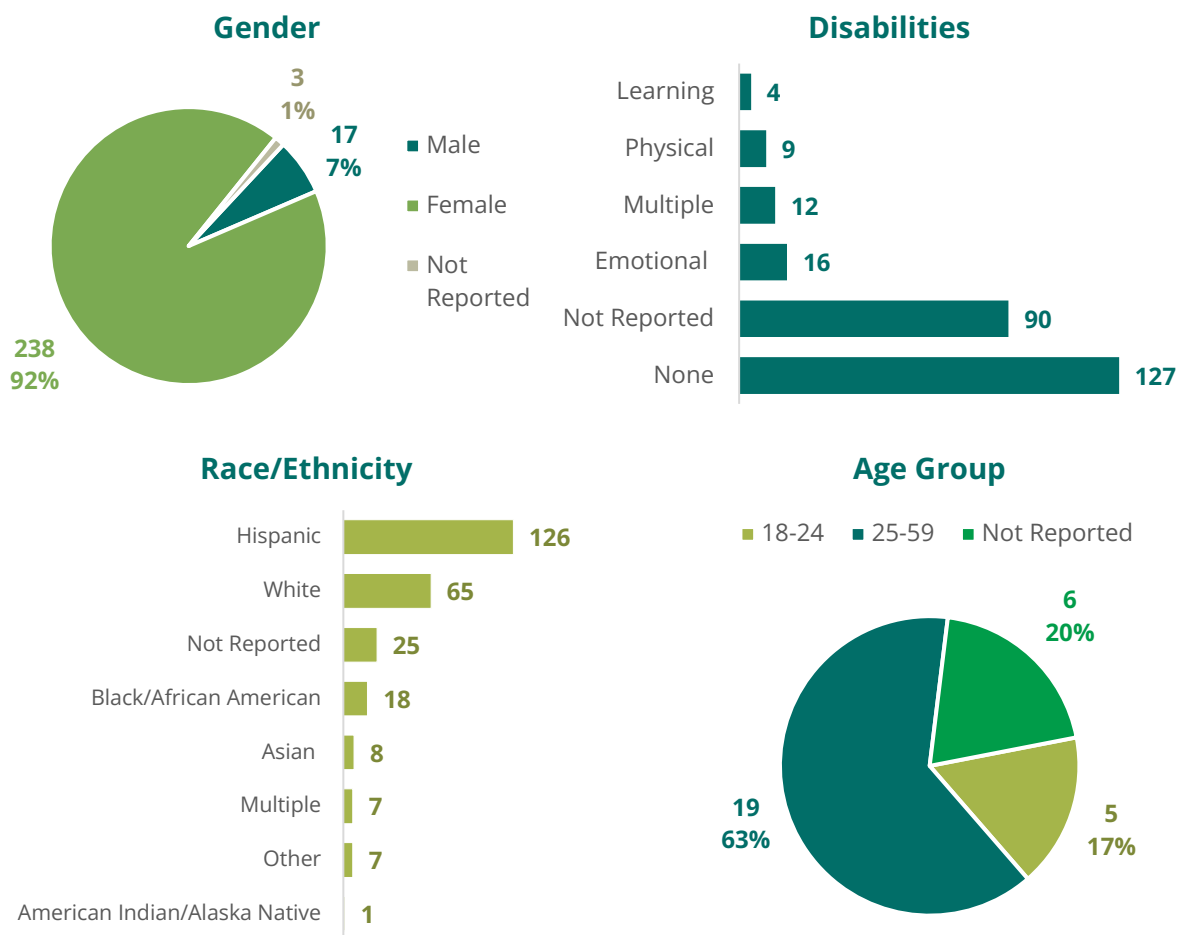
Client Data from HAVEN on Individuals Fleeing Domestic Violence, Sexual Assault, and Human Trafficking

The Consortium requested data from organizations serving victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking to better understand the size and demographic composition of this QP. One organization that provided data is HAVEN, a nonprofit based in Modesto with an office in Turlock, which provides services for survivors of domestic violence, sexual assault, and human trafficking. HAVEN services include a 24-hour crisis line, 24-hour trauma response at local emergency rooms, emergency shelter, survivors-centered advocacy, peer counseling and support groups, safety planning and case management, and restraining order assistance. Services are available to survivors across Stanislaus County.

In 2013, the City of Turlock and HAVEN collaborated to open an office in Turlock to increase access for survivors in the southern portion of Stanislaus County. HAVEN does not track data on survivor location. Although Stanislaus Urban County residents may receive services in Modesto, the Consortium has opted to focus on data for services received at the Turlock office in this document. In 2022, HAVEN provided services to 258 survivors in Turlock; this is a 23 percent increase from the number of survivors served in 2021. Of these 258 individuals, 86 percent identified primarily as having experienced domestic violence, 12 percent primarily sought services for sexual assault, and 2 percent were survivors of

human trafficking. Figure 9 provides demographic data for individuals served by the Turlock office in 2022.

Figure 9: Demographic Information of Residents Served by HAVEN Turlock Office



Data source: HAVEN data, 2022.

The program data indicate that of the 258 individuals served in Turlock, 49 percent were Hispanic, 25 percent were White, and seven percent were Black or African American. In addition, 73 percent were aged 25–59, 13 percent were aged 18–24, and 8 percent were under 18. Ninety-two percent were female and 7 percent were male. Additionally, of the 89 individuals for whom data were collected, 16 (18 percent) had limited English proficiency.

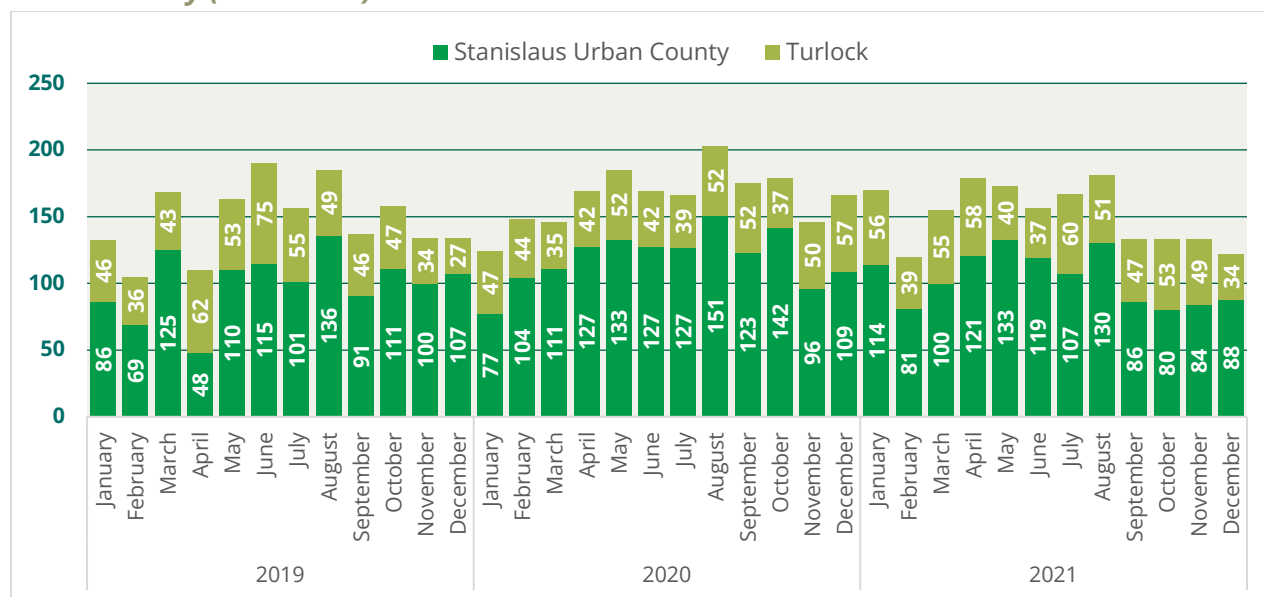
Domestic Violence-Related Calls for Service in Turlock and Stanislaus Urban County

The Consortium also analyzed data from the California Department of Justice Criminal Justice Statistics Center which publishes monthly statistics on domestic violence-related calls for service collected from local enforcement entities across the state. The Center defines “domestic violence” as “abuse committed against an adult or a fully emancipated minor who is a spouse, former spouse, cohabitant, former cohabitant, or person with

whom the suspect has had a child or is having or has had a dating or engagement relationship.” “Abuse” is further defined as “intentionally or recklessly causing or attempting to cause bodily injury or placing another person in reasonable apprehension of imminent serious bodily injury to himself, herself, or another.” Domestic violence-related calls for service data include cases that resulted in the reporting local enforcement agency writing a report, which means that the data include cases where an arrest was made and cases where there was a call for assistance, but no arrest.

Figure 10 depicts the number of monthly calls made to local law enforcement entities in Turlock and Stanislaus Urban County that were related to domestic violence from 2019 to 2021. The data indicate a seasonal variation in law enforcement calls with the number of calls being highest in the summer months. The total number of calls per year has been relatively consistent. There were 1,772 calls in 2019, 1,976 calls in 2020, and 1,822 calls in 2021. While the state does not publish demographic information on the individuals involved in domestic violence-related calls for service, the data on cases in Turlock and Stanislaus Urban County provide a glimpse into the prevalence of domestic violence incidents from the perspective of law enforcement.

Figure 10: Monthly Domestic Violence-Related Calls for Service in Turlock and Stanislaus Urban County (2019–2021)



Data source: California Department of Justice, Domestic Violence-Related Calls for Service, 2019–2021.

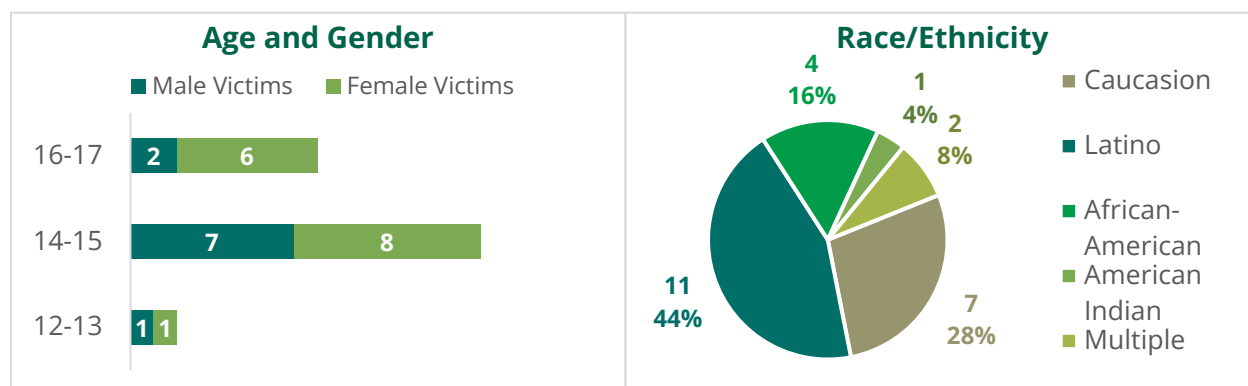
Data From the Center for Human Services

The Consortium reviewed information from the Center for Human Services to better understand the size and demographic composition of youth fleeing or attempting to flee human trafficking in the Stanislaus County region. Center for Human Services serves youth

and families across Stanislaus County through mental health services, youth and school-based services, substance use treatment, workforce development, family resource centers, youth navigation centers, transitional and permanent housing for transition-age youth (18–24), and Hutton House, an emergency shelter for runaway and homeless youth and youth in crisis aged 13–17.

In FY 2021–2022, Hutton House served 68 youths, 39 of whom were fleeing human trafficking. Excluding youth from Modesto, Hutton House served 25 youths fleeing human trafficking. Figure 11 provides demographic data for those 25 youths. Sixty percent were female, 53 percent were aged 14–15, and 44 percent were Latino.

Figure 11: Demographic Information of Human Trafficking Victims Served at Hutton House



Data source: HAVEN data, 2022.

Other Populations Requiring Services or Housing Assistance to Prevent Homelessness and Other Populations at Greatest Risk of Housing Instability

The fourth HOME-ARP QP is for “other populations” for whom providing supportive services or assistance would prevent homelessness or would serve those with the greatest risk of housing instability. To estimate the size and demographic composition of this QP, the Consortium analyzed several data sources including 2019 CHAS data on households earning between 30–50 percent AMI who are experiencing one or more of the four severe housing problems captured in the data. The Consortium also collected data from the 2017–2021 five-year estimates from the American Community Survey for information on veterans living below the poverty line.

CHAS Data on Very Low-Income Households

CHAS data aligns with parts of the HOME-ARP definition for other populations at greatest risk of homelessness or housing instability that earn between 30–50 percent AMI and are experiencing one or more of the four severe housing problems captured in CHAS data. Households earning between 30–50 percent AMI, also referred to as very low-income (VLI) households, can be at risk of homelessness particularly if they are experiencing one or more of the four severe housing problems.

Countywide, 2019 CHAS data indicates that there were 22,095 VLI households across Stanislaus County, of which 13,695 were renters and 8,400 were owners. When excluding the City of Modesto, the Consortium was home to 13,330 of these VLI households and 7,835 were renters while 5,945 were owners. Overall, 6,020 VLI households in the Consortium, or 45 percent of all VLI households, experienced one or more of the four severe housing problems. The most common severe housing problem was severe housing cost burden with 4,690 households paying more than half of their income on housing costs. Table 19 outlines the number of VLI households with severe housing problems in Stanislaus County, Turlock, and Stanislaus Urban County by tenure. The data indicate that a larger percentage of ELI households were renters in Turlock compared to Stanislaus Urban County; however, the percentages of renters and owners who were severely cost-burdened were nearly the same between the two jurisdictions.

Table 19: VLI Households With Severe Housing Problems in Stanislaus County by Tenure and Jurisdiction

VLI Renter Households	Countywide	Turlock	Stanislaus Urban County*
Severely cost-burdened	6,215	1,015	1,925
Severely overcrowded	230	0	95
Incomplete kitchen/plumbing	220	30	70
Total VLI renter households	13,695	2,135	5,700
VLI Owner Households	Countywide	Turlock	Stanislaus Urban County
Severely cost-burdened	3,015	475	1,275
Severely overcrowded	90	25	50
Incomplete kitchen/plumbing	20	4	12
Total VLI owner households	8,400	1,100	4,395
Total VLI Households	Countywide	Turlock	Stanislaus Urban County
Severely cost-burdened	9,230	1,490	3,200
Severely overcrowded	320	25	145
Incomplete kitchen/plumbing	240	34	82
Total VLI households	22,095	3,235	10,095

Data source: CHAS, 2019.

**Note: Stanislaus Urban County refers to the entire county minus the cities of Turlock and Modesto.*

Table 20 includes a breakdown of VLI renter households by race and ethnicity in Turlock and Stanislaus Urban County and indicates whether the household experienced one or more of the four severe housing problems. CHAS data uses the race and ethnicity of the head of the household who provided data on behalf of their household as a proxy for the race and ethnicity of the entire household. For Turlock, the data indicates that 1,270 VLI renter households experienced at least one severe housing problem. Of these households, 50 percent were White, 42 percent identified as Hispanic (of any race), 4 percent were Black/African American, 1 percent were Asian, and 1 percent were Pacific Islander. For Stanislaus Urban County, there were 2,730 VLI renter households that experienced one or more severe housing problems, of which 61 percent identified as Hispanic (of any race), 32 percent were White, 4 percent were Black, and 2 percent were Asian. For both Turlock and the Urban County, the sample sizes of VLI American Indian/Alaska Native and Pacific Islander renter households were quite small and therefore may not accurately represent the housing needs of either population. For Turlock, the sample size of VLI Asian renter households was also small (15 households).

Table 20: Severe Housing Problems by Race/Ethnicity Among VLI Renter Households

Race/Ethnicity	Turlock VLI Renter Households			Stanislaus Urban County VLI Renter Households		
	# With One or More Severe Housing Problems	# Without Severe Housing Problems	Total VLI Renter Households	# With One or More Severe Housing Problems	# Without Severe Housing Problems	Total VLI Owner Households
American Indian or Alaska Native, non-Hispanic	0	0	0	20	0	20
Asian alone, non-Hispanic	15	0	15	50	20	70
Black or African American, non- Hispanic	55	20	75	110	0	110
Pacific Islander alone, non- Hispanic	15	0	15	0	0	0
White alone, non-Hispanic	640	415	1,055	865	885	1,750
Hispanic, any race	535	415	950	1,670	2,060	3,730
Total	1,270	870	2,140	2,730	2,965	5,695

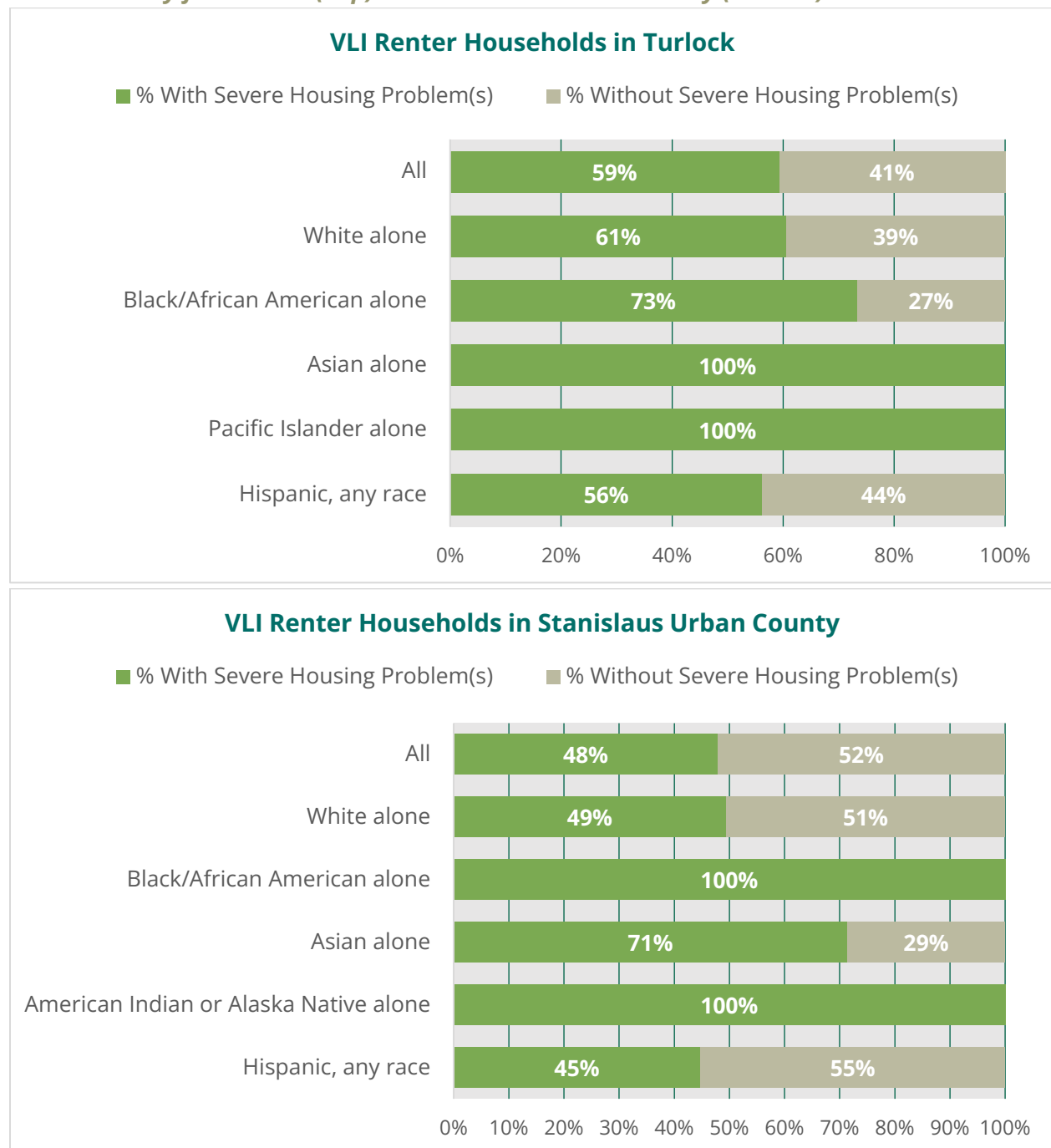
Data source: CHAS, 2019.

Figure 12 depicts which race and ethnicity may be experiencing disproportionately greater need in Turlock and Stanislaus Urban County by comparing the share of ELI renter households with at least one severe housing problem to the share of those who are not experiencing a severe housing problem by race and ethnicity. Disproportionately greater need occurs if a specific race or ethnicity at a given income level experiences housing problems at a rate that is at least 10 percentage points higher than the income level as a whole.

Figure 12 indicates that among VLI renter households in Turlock, 59 percent of all households experienced one or more severe housing problems. When disaggregated by race and ethnicity, VLI Hispanic renter households had the lowest share of households with severe housing problems at 56 percent while VLI Asian and VLI Pacific Islander renter households had the highest share at 100 percent each. Since both of the sample sizes for these populations are low, these estimates may not accurately reflect the housing needs of these households. Among the remaining households, VLI Black/African American renter households are disproportionately impacted by severe housing problems in Turlock. Since the rate of VLI renter households across the City experiencing one or more severe housing problems is 59 percent, and 73 percent of VLI Black renter households had at least one severe housing problem, this population is disproportionately impacted.

For Stanislaus Urban County, Figure 12 indicates that 48 percent of all VLI households experienced one or more severe housing problems. The data show that 100 percent of VLI Black and VLI American Indian/Alaska Native renter households had at least one severe housing problem. While the sample size for VLI American Indian/Alaska Native renter households is small (20 households), the sample for VLI Black renter households includes 110 households, indicating that the CHAS estimates may accurately reflect housing problems for this segment of the population. In addition, the data indicate that VLI Asian renter households in Stanislaus Urban County were disproportionately impacted by severe housing problems since 71 percent of households in this group experienced at least one severe housing problem.

Figure 12: Share of ELI Renter Households With and Without Severe Housing Problems by Race/Ethnicity for Turlock (Top) and Stanislaus Urban County (Bottom)



Data source: CHAS, 2019.

CHAS data from 2019 also indicates that among VLI severely cost-burdened households, the three most common household types in both Turlock and Stanislaus Urban County were small family, other (non-elderly, non-family) households, and elderly non-family households. Table 21 includes a breakdown of household types included in CHAS data.

Families are defined as related individuals living together in the same household. CHAS data include the following household types:

- **Small families:** Two- to four-person households.
- **Large families:** Five or more people.
- **Elderly families:** Two people, with either or both aged 62 and over.
- **Elderly non-family:** Unrelated individuals, over the age of 62.
- **Other (non-elderly, non-family):** Could include unrelated individuals living together, or people living alone, who are under the age of 62.

In 2019, there were 575 VLI severely cost-burdened small families, 380 other (non-elderly, nonfamily) households, and 225 elderly non-families in Turlock. Thirty-two percent of VLI and severely cost-burdened households in Turlock were owners while 68 percent were renters. In comparison, among VLI and severely cost-burdened households in Stanislaus Urban County, 40 percent were owners and 60 percent were renters. When disaggregated by household type, there was considerable variation. In Turlock, 4 percent of VLI other households were homeowners while 47 percent of VLI small families were owners. In Stanislaus Urban County, 26 percent of VLI large families were homeowners while 57 percent of VLI elderly non-family households were owners. Differences in housing tenure for ELI severely cost-burdened households have implications for which forms of housing assistance would be most beneficial for those unable to afford housing costs.

Table 21: Household Types of VLI Households With Severe Housing Cost Burden

Household Type	Turlock VLI Households With Severe Housing Cost Burden			Stanislaus Urban County VLI Households With Severe Housing Cost Burden		
	Owners	Renters	Total	Owners	Renters	Total
Elderly family	70	140	210	240	200	440
Small family	270	305	575	520	880	1,400
Large family	35	65	100	100	280	380
Elderly non-family	85	140	225	260	200	460
Other (non-elderly, non-family)	15	365	380	155	365	520
Total	475	1,015	1,490	1,275	1,925	3,200

Data source: CHAS, 2019.

Lastly, Table 22 provides estimates on the number of VLI households with one or more housing problems that include an individual with a disability. CHAS data only provide information for renter and total households, and it is not possible to calculate the number of owner households using this data because it is unknown whether any households were excluded from the analysis if, for example, housing cost burden could not be computed.

The data indicate that the most prevalent type of disability among VLI households with one or more housing problems in Turlock and Stanislaus Urban County was for ambulatory limitations followed by self-care or independent living limitations. Among VLI renter households in Turlock, self-care or independent living limitations were the most common and in Stanislaus Urban County, ambulatory limitations were most common among VLI renter households. While it is unclear the extent to which households have more than one type of disability, the data suggest that a large number of VLI renter households in Turlock and Stanislaus Urban County would benefit from affordable housing options that are accessible to individuals with self-care needs or physical limitations.

Table 22: Disability Types of ELI Households With Housing Problems

Disability Type	Turlock VLI Households With Housing Problems		Stanislaus Urban County VLI Households With Housing Problems	
	Renters	Total	Renters	Total
Household member has a hearing or vision impairment	290	505	710	1,200
Household member has an ambulatory limitation	365	575	1,065	1,670
Household member has a cognitive limitation	330	405	930	1,445
Household member has a self-care or independent living limitation	380	510	945	1,475
Household member has none of the above limitations	1,295	1,810	3,090	4,715

Data source: CHAS, 2019.

Veterans Living Below the Poverty Line

Data from the American Community Survey provide additional information on the number of veterans in Turlock and Stanislaus Urban County who are living below the poverty line. Although veterans are not a distinct HOME-ARP QP, HUD [Notice: CPD-21-10](#) states that veterans and their households that meet the criteria for one of the QPs are eligible to receive HOME-ARP assistance.

Table 23 indicates that there were 2,610 veterans in Turlock and 6,570 veterans in Stanislaus Urban County in 2021. In Turlock, 123 veterans had incomes below the federal poverty line, of whom all 123 (100 percent) had a disabling condition and were over the age of 65. In the Urban County, 589 veterans had incomes below the federal poverty line, of whom 265 also had a disability (45 percent) and 237 (40 percent) both had a disability and were over the age of 65. The data suggest that a few hundred ELI veterans may be eligible for assistance under HOME-ARP in the Consortium.

Table 23: Veterans by Category in Turlock and Stanislaus Urban County

Veterans by Category	Turlock	Stanislaus Urban County
Total veterans	2,610	6,570
Veterans with incomes below the federal poverty line	123	589
Veterans with incomes below the federal poverty line with a disability	123	265
Veterans with incomes below the federal poverty line with a disability and over age 65	123	237

Data source: American Community Survey, 2021 1-year estimates.

Identify and consider the current resources available to assist QPs, including congregate and non-congregate shelter units, supportive services, tenant-based rental assistance, and affordable and permanent supportive rental housing (Optional).

Shelter Beds and Housing Inventory

Tables 24 and 25 reflect the capacity of each type of housing intervention and indicates that most units and beds are for rapid rehousing and emergency shelter. Based on the 2022 Housing Inventory Count, there was a total of 88 year-round and 49 seasonal emergency shelter beds in Turlock and 105 year-round and 22 voucher/overflow shelter beds in Stanislaus Urban County. There were 22 transitional housing beds, four rapid rehousing beds, and six permanent supportive housing beds in Turlock. In Stanislaus Urban County, there were four rapid rehousing beds and no transitional or permanent supportive housing beds.

Transitional housing provides temporary housing with supportive services to individuals and families experiencing homelessness with the goal of interim stability and support to successfully move to and maintain permanent housing. Rapid rehousing is intended to connect families and individuals to permanent affordable housing supported by case management, targeted supportive services, and rental subsidies. Permanent supportive housing provides permanent affordable housing (typically with deeper affordability levels than rapid rehousing) and supportive services to individuals and families who have disabling conditions.

It should be noted that shelter and housing beds specific to victims of domestic violence or human trafficking have undisclosed locations and are included in this inventory. Any beds that are definitively located in Modesto have been removed.

Table 24: Turlock Homeless Housing Inventory by Bed/Unit Type

Program Type	Family (Adults and Children)		Adult Only	Child Only	Voucher	Seasonal
	# Beds	# Units	# Beds	# Beds	# Beds	# Beds
Emergency shelter	2	1	78	8	0	49
Transitional housing	21	8	1	0	0	0
Permanent supportive housing	0	0	6	0	0	0
Rapid rehousing	2	1	2	0	0	0

Data source: Housing Inventory Count, 2022.

Table 25: Stanislaus Urban County Homeless Housing Inventory by Bed/Unit Type

Program Type	Family (Adults and Children)		Adult Only	Child Only	Voucher	Seasonal
	# Beds	# Units	# Beds	# Beds	# Beds	# Beds
Emergency shelter	83	22	22	0	22	0
Transitional housing	0	0	0	0	0	0
Permanent supportive housing	0	0	0	0	0	0
Rapid rehousing	2	1	2	0	0	0

Data source: Housing Inventory Count, 2022.

Supportive Services Inventory

There is a wide range of services available within the Turlock and Stanislaus Urban County. In addition to the supportive services that are built into permanent supportive housing, transitional housing, rapid rehousing, and emergency shelter programs, there are various

stand-alone services available to residents. Table 26 outlines available services across service types identified through consultation as having the greatest unmet need: case management, mental health services, outreach services, victim-survivor advocacy services, and legal services. Even where these services exist, stakeholders report that the need for services exceeds service capacity.

Table 26: Supportive Services in Turlock and Stanislaus Urban County

Service Type	Available Resources
Case management	<ul style="list-style-type: none"> • Catholic Charities Health Care Access Program • Center for Human Services • Stanislaus County Behavioral Health and Recovery Services • Stanislaus County Aging and Veterans Services • Turlock Gospel Mission Day Center
Mental health services	<ul style="list-style-type: none"> • Catholic Charities Family Wellness Services • Center for Human Services • Golden Valley Health Centers (Patterson) • Stanislaus County Behavioral Health and Recovery Services
Housing search assistance and counseling	<ul style="list-style-type: none"> • Disability Resources Agency for Independent Living
Victim-survivor advocacy	<ul style="list-style-type: none"> • HAVEN
Legal services	<ul style="list-style-type: none"> • California Rural Legal Assistance • Catholic Charities Immigration Legal Services • Legal Aid At Work • Senior Advocacy Network • Stanislaus Family Justice Center
Landlord/tenant liaison	<ul style="list-style-type: none"> • California Rural Legal Assistance • Project Sentinel
Substance use treatment services	<ul style="list-style-type: none"> • Center for Human Services • New Hope Recovery House • Stanislaus County Behavioral Health and Recovery Services

Service Type	Available Resources
Childcare	<ul style="list-style-type: none"> • Central California Child Development Services • Stanislaus County Community Services Agency • Stanislaus County Office of Education • Waterford USD Child Development Center
Employment assistance and job training	<ul style="list-style-type: none"> • California Department of Rehabilitation • California Department on Aging • Center for Human Services • Central Valley Opportunity Center • Goodwill Industries of San Joaquin County, Inc. • Howard Prep • Modesto Junior College • Stanislaus County Behavioral Health and Recovery Services • Stanislaus County Community Services Agency • Stanislaus County Department of Workforce Development • Turlock USD Career Technical Education

Data source: Consortium data.

Affordable Housing Inventory

The Consortium collected and analyzed local and state data on the inventory of affordable rental housing units in Turlock and Stanislaus Urban County to identify the community's current resources for the HOME-ARP QPs. Data from the California Housing Partnership's Affordable Housing Map provided an estimate for the number of state- and federally-assisted rental units in the Consortium, while data from the City and County provided additional insight into existing affordable rental housing in the community.

California Housing Partnership Affordable Housing Map

The California Housing Partnership offers a publicly available mapping tool that provides information on state- and federally-funded affordable rental housing properties and units across the state. The Partnership's database includes affordable rental properties that received subsidies from certain programs administered by HUD, the U.S. Department of Agriculture, the California Housing Finance Agency, the California Department of Housing and Community Development, and the Low-Income Housing Tax Credit program. The [Partnership's Affordable Housing Map Methodology](#) outlines which specific state and federal subsidy programs are included in the affordable housing database. Since the database includes only certain state- and federally-assisted rental housing, it may not contain all existing assisted units in Turlock and Stanislaus Urban County.

The mapping tool indicates that as of October 2021, there were 694 assisted units in Turlock and 1,492 assisted units in Stanislaus Urban County. Table 27 outlines the number

of assisted units and properties by funding source and jurisdiction. For Turlock, the data indicate that almost all assisted units (89 percent) were subsidized by the Low-Income Housing Tax Credit program, 21 percent were funded by a HUD program, and 9 percent were funded by a California Department of Housing and Community Development program. For the Urban County, 89 percent of assisted units were subsidized by the Low-Income Housing Tax Credit program, 25 percent were funded by the U.S. Department of Agriculture, 17 percent were funded by a HUD program, 5 percent were subsidized by the California Housing Finance Agency, and 4 percent were funded by a California Department of Housing and Community Development program.

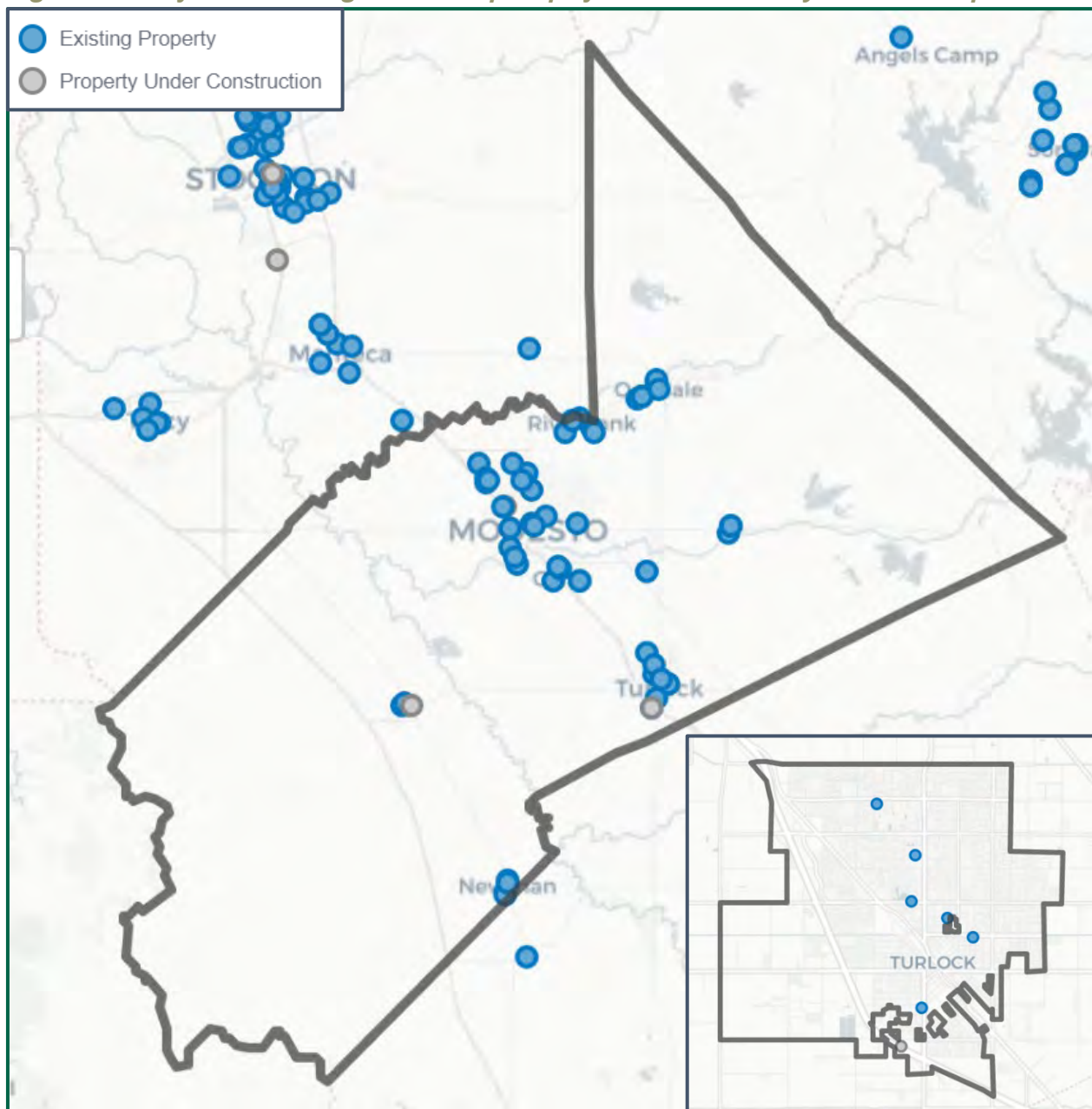
Table 27: State- and/or Federally-Assisted Housing in Turlock and Stanislaus Urban County

Funding Source	Turlock				Stanislaus Urban County			
	# Units	% Units	# Properties	% Properties	# Units	% Units	# Properties	% Properties
Low-Income Housing Tax Credit program	615	89%	7	88%	1,330	89%	25	86%
HUD	149	21%	2	25%	259	17%	4	14%
U.S. Department of Agriculture	0	0%	0	0%	378	25%	10	34%
Department of Housing and Community Development	60	9%	1	13%	65	4%	1	3%
California Housing Finance Agency	0	0%	0	0%	80	5%	1	3%
Total	694	100%	8	100%	1,492	100%	29	100%

Data source: California Housing Partnership, 2021.

Figure 13 shows the California Housing Partnership's map of Stanislaus County and the City of Turlock. The blue dots on the map are completed affordable housing properties and the gray dots are properties under construction as of October 2021. The map shows that most assisted properties are in Modesto and Turlock with fewer located elsewhere across the County.

Figure 13: California Housing Partnership Map of Stanislaus County Assisted Properties



Data source: California Housing Partnership, 2021.

Data from the California Housing Partnership also provide insight into the number of subsidized units in Turlock and Stanislaus Urban County that are targeted to various subpopulations and include income restrictions for residents. Table 28 outlines the number of assisted units by category and indicates that there is data available on 2,009 (92 percent) of the Consortium's assisted units. Of the assisted units with available data, 59 percent are targeted to families, 24 percent are targeted to seniors and the elderly, 13 percent are not targeted to any population, and 4 percent are targeted to those at risk of homelessness.

Many assisted properties in the Partnership’s database contained missing data on income restrictions, so there is only data available on 617 units (28 percent) of the Consortium’s total assisted units. From the data that is available, most income-restricted units are units set aside for families earning above 50 percent AMI. Since most of the data is unavailable, this is most likely an undercount of the total number of assisted units with income restrictions in the Consortium.

Table 28: Assisted Units by Targeted Subpopulations and Income Restrictions

# Assisted Units	Subpopulation				Total
	At-Risk	Elderly/ Seniors	Families	Not Targeted	
# Assisted units	81	488	1,182	258	2,186
Units at 30% AMI	5	9	56	0	70
Units at 35% AMI	5	0	0	0	5
Units at 40% AMI	5	16	34	0	55
Units at 45% AMI	0	18	39	0	57
Units at 50% AMI	11	56	161	0	228
Units at 55% AMI	0	11	50	0	61
Units at 60% AMI	15	23	103	0	141

Data source: California Housing Partnership, 2021.

Stanislaus County Housing Element Data

Another source of information on the number of existing affordable rental housing units is the Annual Progress Reports for the County’s Housing Element (5th Cycle) which began on December 31, 2015 and will end on December 31, 2023. The Housing Element outlines the County’s housing goals and policies for the eight-year period to address regional housing needs and identifies the Regional Housing Needs Assessment (RHNA) unit allocation for each jurisdiction. Table 29 summarizes information from the 2021 Annual Progress Reports submitted by jurisdictions across Stanislaus County and includes the number of housing permits for units at different income levels and shows progress against the County’s RHNA unit allocations during the 5th cycle. This information is useful for estimating the number of housing units that are being developed for each jurisdiction.

Table 29: County's Housing Element 5th Cycle Progress

Stanislaus County	Very Low (30% AMI)		Low (50% AMI)		Moderate (80% AMI)		Above Moderate (120% AMI)		RHNA Total Units	
	Permits	RHNA	Permits	RHNA	Permits	RHNA	Permits	RHNA	Permits	RHNA
Turlock	18	877	252	562	650	627	305	1,552	1,225	3,618
Modesto	103	1,546	264	991	400	1,100	1,135	2,724	1,902	6,361
Stanislaus Urban County	50	2,166	117	1,389	171	1,527	1,529	3,778	1,867	8,860
<i>Ceres</i>	0	622	1	399	12	446	71	1,104	84	2,571
<i>Hughson</i>	0	53	0	34	0	38	91	93	91	218
<i>Newman</i>	3	186	1	119	4	136	48	337	56	778
<i>Oakdale</i>	14	315	45	202	84	210	421	520	564	1,247
<i>Patterson</i>	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
<i>Riverbank</i>	33	321	38	206	0	217	195	536	266	1,280
<i>Waterford</i>	0	131	0	84	4	89	109	221	113	525
<i>Unincorporated County</i>	0	538	32	345	67	391	594	967	693	2,241
Countywide Total	171	4,589	633	2,942	1,221	3,254	2,969	8,054	4,994	18,839

Data source: California Housing Element Implementation and Annual Performance Report Data Dashboard, 2021.

Federal Rental Assistance

The Consortium also reviewed data from HUD's Housing Choice Voucher Data Dashboard and the Emergency Housing Voucher Data Dashboard on the availability and use of federal vouchers at the Stanislaus Regional Housing Authority. The Housing Authority of the City of Riverbank only administers public housing and does not receive any of the vouchers included in Table 30. The data provide the number of vouchers by program type that were available and in use as of November 2022. The first row in the table identifies the number of Housing Choice Vouchers available and in use at the housing authority and indicates that there are 4,929 Housing Choice Vouchers and recipient households are utilizing 96 percent of them. While the utilization rate for Housing Choice Vouchers has ebbed and flowed over the past few years, overall, the Housing Choice Voucher utilization rate has stayed above 90 percent.

The next three rows in Table 30 include information on special-purpose vouchers. The Mainstream Voucher Program, previously known as Mainstream 5 or Section 811 vouchers, assists households that include a non-elderly person with disabilities. The housing authority has 114 Mainstream vouchers, of which 20 percent are being used. The Family Unification Program provides vouchers to serve two main types of recipients: 1.) families that lack adequate housing and are at imminent risk of the household's children being placed in out-of-home care and 2.) youth between the ages of 18 and 24 who have left or will soon leave the foster care system and are either currently homeless or at risk of becoming homeless. The housing authority has 217 Family Unification Program vouchers and 78 percent of them are being used. The Veterans Affairs Supportive Housing program offers rental assistance and case management to homeless veterans. The housing authority has 258 Veterans Affairs Supportive Housing vouchers and 76 percent are being used. Lastly, Emergency Housing Vouchers are vouchers awarded under the American Rescue Plan to vulnerable populations that closely resemble the HOME-ARP QPs. The Emergency Housing Voucher Dashboard indicates that the Stanislaus Regional Housing Authority received 200 Emergency Housing Vouchers and 45 percent of them are being used.

The last row in the table includes Project-Based Vouchers, which represent rental assistance that is tied to a specific housing unit. The data indicates that 164 units are utilizing Project-Based Vouchers, which represents 81 percent of available Project-Based Vouchers at the housing authority.

Table 30: Availability and Utilization of Vouchers at Stanislaus Regional Housing Authority

Voucher Type	Stanislaus Regional Housing Authority		
	# Vouchers Available	# Vouchers in Use	Utilization Rate
Housing Choice Vouchers	4,929	4,707	96%
Mainstream Vouchers	114	23	20%
Family Unification Program Vouchers	217	169	78%
Veterans Affairs Supportive Housing Vouchers	258	197	76%
Emergency Housing Vouchers	200	90	45%
Project-Based Vouchers	203	164	81%

Data sources: 1. HUD Housing Choice Voucher Data Dashboard, 2022; 2. Emergency Housing Voucher Data Dashboard, 2023.

Consortium Housing Assistance and Development Programs

Lastly, the Consortium reviewed the various housing programs it currently funds or has supported within the past few years to catalog local programs and capacity that could serve the HOME-ARP QPs. Table 31 outlines the Consortium-funded programs related to housing assistance and development and describes their impact on the community.

Table 31: Consortium Programs Related to Housing Assistance and Development

Program/Project Type	Description and Impact
Housing rehabilitation	The City of Turlock and Stanislaus Urban County fund the rehabilitation of single and multifamily affordable housing through CDBG and HOME funds, which assisted two households in fiscal year 2021-2022.
Rental Assistance	During the COVID-10 pandemic, jurisdictions across Stanislaus County provided rent, mortgage, and utility assistance to households that were negatively impacted by the pandemic. Turlock spent \$94,120 and served 39 households with housing cost assistance while Countywide, jurisdictions spent \$39.5M to serve 4,393 households (as of March 2023) during the pandemic.

Program/Project Type	Description and Impact
Acquisition and Development	Turlock uses CDBG and HOME funds for the acquisition and rehabilitation of properties for affordable housing. In fiscal year 2021-2022, the City spent CDBG funds to acquire and rehabilitate properties that will assist two households.

Data source: Consortium data, 2022. California Rent Relief Dashboard, 2023.

Describe the unmet housing and service needs of QPs.

Individuals Experiencing Homelessness

HMIS Exit Destinations

Among the individuals experiencing homelessness in Turlock who were enrolled in emergency shelter, transitional housing, and safe haven programs, there were 233 who exited in 2021. Of these exits, five were to temporary destinations, four were to permanent destinations, and 224 were to unknown destinations or places not meant for human habitation. In Stanislaus Urban County, there were 1,581 exits, of which 1,015 were to temporary destinations, 97 were to permanent destinations, and 469 were to unknown destinations or places not meant for human habitation. For individuals who exited to unknown destinations or places not meant for human habitation, it is unclear where these individuals exited. Unfortunately, HMIS data does not capture the physical location associated with exits to places not meant for human habitation. These data suggest that although people may have access to temporary settings like shelter and transitional housing, most individuals are unable to move into permanent housing.

Among individuals exiting from permanent housing—including permanent supportive housing and transitional housing—in Turlock, there were zero exits. In Stanislaus Urban County, there were 82 exits from permanent housing, of which 65 were to permanent destinations, ten were to temporary destinations, and seven were to unknown destinations or places not meant for human habitation. The lower rates of exits and more positive exit destinations may indicate that, when individuals can access permanent housing with services, they are more likely to maintain positive outcomes.

Table 32: Exit Rates by Destination and Program Type

Exit Destination	Turlock		Stanislaus Urban County	
	Emergency Shelter, Transitional Housing, Safe Haven Exit Rates	Permanent Housing Exit Rates	Emergency Shelter, Transitional Housing, Safe Haven Exit Rates	Permanent Housing Exit Rates
Permanent destination	4	0	97	65
Temporary destination	5	0	1,015	10
Unknown destination or place not meant for human habitation	224	0	469	7

Data source: HMIS Data, 2021.

2022 Stanislaus County Point-in-Time Count

Of the 1,857 individuals identified in the 2022 Point-in-Time count, 49 percent were sheltered, and 51 percent were unsheltered. Individuals who were unsheltered slept in outdoor encampments, on the street or sidewalk, in vehicles, boats, or RVs, in parks, under bridges or overpasses, in abandoned buildings, in busses or train stations, and in other locations. The main reasons cited for declining shelter services were staff/drugs/safety/violence (38 percent), shelter rules (28 percent), pets (12 percent), abuse (11 percent), and substance abuse (11 percent).

Seventy-seven percent of people surveyed indicated they were experiencing homelessness for the first time. Eleven percent said they were experiencing homelessness as a direct result of COVID-19. Other reasons for becoming homeless included: inability to pay rent (21 percent), being asked to leave where they were staying (18 percent), lost job (16 percent), alcohol or substance abuse (16 percent), illness of self or family member (15 percent), and abuse or violence in the home (14 percent). These reasons point to a need for more affordable housing as well as services to avoid homelessness, such as one-time financial assistance, employment assistance, substance abuse treatment, and victim advocacy services.

The obstacles to accessing services identified in surveys included: lack of transportation (33 percent), no ID or documents, (25 percent), not knowing where to go (23 percent), and being put on a waitlist and never contacted (19 percent). This suggests the need for more outreach services and ongoing case management services.

Needs Identified Through Stakeholder Consultation and Survey

During the consultation sessions and survey, stakeholders noted unmet needs related to shelter, affordable rental housing, and supportive services. Although the number of shelter beds has been increasing in recent years, many are still unable to access emergency shelter. This is particularly true for families with children, people with disabilities, and LGBTQ+ folks.

People experiencing homelessness also face barriers when seeking housing in the private market. Due to the tight rental market, landlords have implemented stringent rental screening criteria that prevent access for individuals and families with multiple barriers to housing, including those related to disability, LGBTQ+ identity, and legal issues. Persons issued Housing Choice Vouchers or other tenant-based rental assistance are frequently unable to use the assistance due to high rents and restrictive screening criteria.

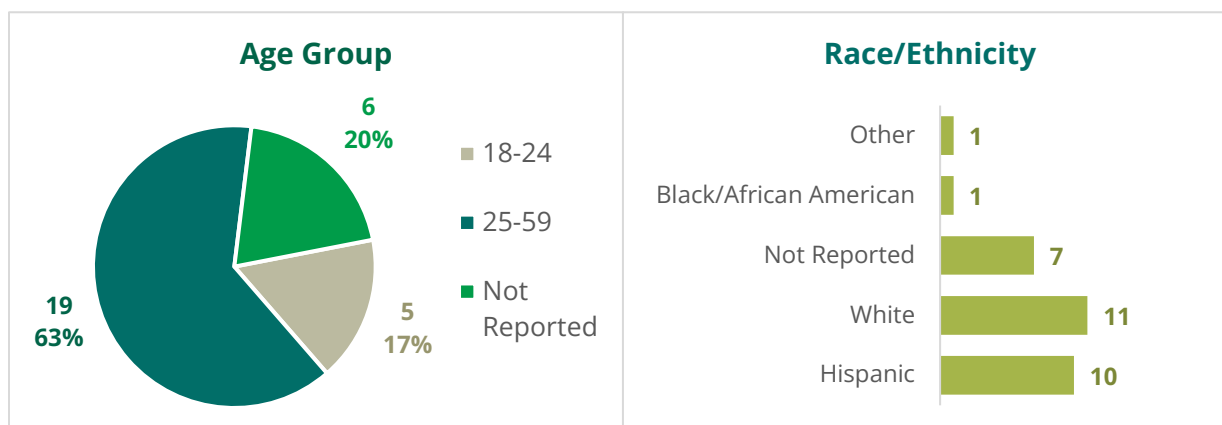
In consultation sessions, stakeholders described a need for outreach services, legal services, and case management to support people experiencing homelessness in obtaining and maintaining housing. In the survey, stakeholders identified housing search assistance and counseling, case management, mental health services, substance use treatment services, and food assistance as some of the top-needed supportive services for individuals and families experiencing homelessness.

The quantitative data analysis on the needs facing individuals experiencing homelessness emphasizes a need for additional permanent housing options, shelter beds, and access to supportive services to help individuals navigate systems and achieve housing stability. These needs align with the information gathered through the consultation sessions and survey which indicated a high need for affordable rental housing and supportive services for individuals experiencing homelessness.

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

HAVEN reported that the emergency shelter (undisclosed location in Stanislaus County) turned away 30 individuals in 2021 and 2022, each of whom identified Turlock as their primary location. Twenty-nine were female and one was male. The age and race/ethnicity of those turned away from shelter are summarized in Figure 14. Most notably, none of those turned away were children or elderly persons. The Consortium does not have data about the number of unmet requests for shelter by residents county-wide.

Figure 14: Demographic Information of Turlock Residents Not Served by HAVEN Shelter



Data source: HAVEN data, 2022.

The National Network to End Domestic Violence’s [2022 Domestic Violence Counts Report—California Summary](#) found that there were 1,071 unmet requests for services—including emergency shelter, housing, transportation, childcare, legal representation, and other support needs—that programs could not provide because they lacked the resources. Approximately 42 percent of these unmet requests were for housing and emergency shelter. Anecdotal data suggest the prevalence of unmet needs statewide is consistent with unmet needs of domestic violence, sexual assault, and human trafficking survivors in Turlock and Stanislaus Urban County.

Needs Identified Through Stakeholder Consultation and Survey

During the consultation sessions and survey, stakeholders noted unmet needs related to shelter capacity, access to affordable rental housing, and supportive services. HAVEN is the only domestic violence shelter in Stanislaus County and only has the capacity to shelter six households (up to two single adults and four families). Stays at the HAVEN shelter are supposed to be only four weeks, but some shelter residents have been allowed to stay up to eight weeks. Shelter residents have been unable to obtain housing in the private market within the four weeks due to a lack of affordable units and restrictive screening criteria.

In consultation, stakeholders highlighted the lack of services available for survivors of labor trafficking as well as the need for additional funding for advocacy and outreach services. In the survey, stakeholders identified victims’ advocacy services, case management, childcare, legal services, and mental health services as some of the most-needed services for individuals fleeing or attempting to flee domestic violence, sexual assault, dating violence, stalking, and human trafficking.

The quantitative data analysis emphasizes the unmet need for shelter and housing available for persons fleeing or attempting to flee domestic violence, sexual assault, dating

violence, stalking, and human trafficking. Qualitative information gathered through the consultation sessions and stakeholder survey provides additional context that indicates high levels of need for affordable rental housing, tenant-based rental assistance, and supportive services.

Individuals at Risk of Homelessness and Other Populations at Risk of Homelessness and Housing Instability

Data on unit affordability, occupancy, and availability can provide insight into the unmet housing needs of not only individuals at risk of homelessness or housing instability but also each of the QPs.

Estimates of Rental Unit Affordability and Occupancy

One data source to better understand unit affordability and occupancy is CHAS data, which estimates the number of households occupying rental units affordable at different income levels. CHAS data uses HUD-Adjusted Median Family Incomes (HAMFIs) to classify household income which, for the purposes of this analysis, are comparable to AMI. Table 35 depicts the number of households by income level who were occupying rental units that are affordable to specific HAMFI categories in 2019. For example, “rental units affordable at 30% HAMFI” are rental units where the gross rent for the unit is affordable to a household making 30 percent HAMFI. “rental units affordable at 50% HAMFI” would have gross rents that are unaffordable to a household earning 30 percent HAMFI but would be affordable to a household earning 50 percent HAMFI. In 2019, CHAS data indicates that there were approximately 7,055 rental units affordable to households earning less than 30 percent HAMFI and 8,645 rental units affordable to households earning between 30–50 percent HAMFI.

Table 33: Households Occupying Rental Units by Unit Affordability and Household Income

Rental Unit Affordability	Occupant Income Category				
	0–30% HAMFI	30–50% HAMFI	50–80% HAMFI	80–100% HAMFI	Over 100% HAMFI
Rental units affordable at 30% HAMFI	2,970	1,260	990	545	1,290
Rental units affordable at 50% HAMFI	2,805	2,650	1,865	385	940
Rental units affordable at 80% HAMFI	7,090	7,505	9,485	4,495	9,390
Rental units affordable at greater than 80% HAMFI	1,560	2,280	3,720	1,885	10,215

Data source: CHAS Data, 2019.

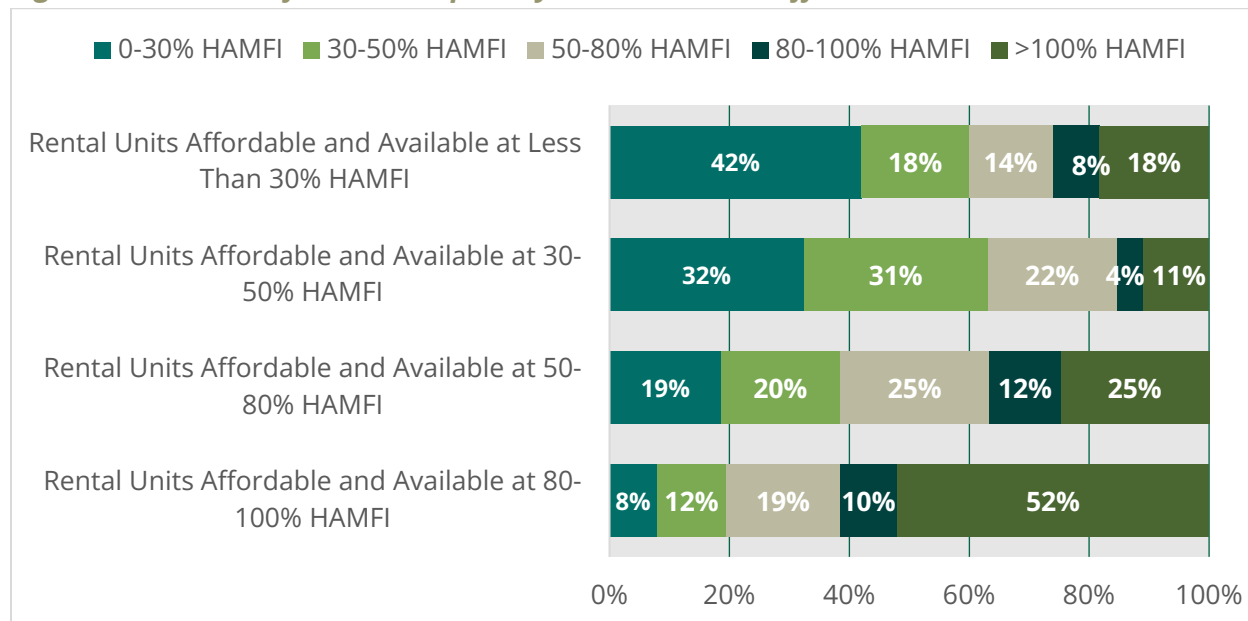
The data indicate that there were a significant number of renter households who were living in units that were not affordable given their household income category. Figure 15 depicts the share of households by income category who were occupying rental units affordable to specific income levels. The data suggest that for rental units at all income levels, there was a mismatch between the income level of the households occupying those units and the income category for which the rental unit would be affordable. Specifically, 42 percent of rental units that are affordable to households earning 30 percent HAMFI were occupied by households earning less than 30 percent HAMFI. In other words, 58 percent of rental units that would be affordable to ELI households were occupied by higher-income households. There were similar trends for rental units affordable at other income levels. For example, only 31 percent of rental units affordable to VLI households were occupied by households earning 30–50 percent HAMFI.

It is important to keep in mind that this data does not provide information that explains the mismatch between households and rental units. For instance, ELI households may not occupy rental units that are affordable to them because these units are not located in their communities. Alternatively, units affordable to households earning 30 percent AMI may be hard to find, and when they are available, ELI households may need to compete with higher-income households to secure them.

Another important consideration is that the number of rental units affordable and available at different income levels does not align with the number of households in each

income category. There are fewer units affordable and available for ELI and VLI households than there are ELI and VLI households. The lack of affordable housing options for the lowest-earning households can force households to reside in units that are unaffordable to them.

Figure 15: Percent of Units Occupied by Households at Different Income Levels



Data source: CHAS Data, 2019.

Stanislaus County Housing Element Updated RHNA

The Consortium is currently in the process of updating its Housing Element for its 6th cycle which will begin on December 31, 2023 and end on December 31, 2031. In the 6th cycle, the County will aim to develop a total of 34,344 affordable housing units during the eight-year period. Table 36 provides the breakdown for the County's 6th cycle RHNA unit allocation by jurisdiction and income category. The RHNA unit allocation is developed using demographic and housing condition data for the region and represents the housing need facing Stanislaus County.

Table 34: County's RHNA Unit Allocation (2023–2031)

Stanislaus County	Very Low (30% AMI)	Low (50% AMI)	Moderate (80% AMI)	Above Moderate (120% AMI)	Total
Turlock	1,305	903	1,096	2,498	5,802
Modesto	2,807	1,943	1,981	4,517	11,248
Stanislaus Urban County	4,298	2,975	3,055	6,966	17,294
<i>Ceres</i>	706	489	661	1,505	3,361
<i>Hughson</i>	284	196	122	279	881
<i>Newman</i>	197	136	218	497	1,048
<i>Oakdale</i>	414	286	294	671	1,665
<i>Patterson</i>	1,046	724	593	1,353	3,716
<i>Riverbank</i>	970	672	594	1,355	3,591
<i>Waterford</i>	107	74	115	261	557
<i>Unincorporated County</i>	574	398	458	1,045	2,475
Countywide Total	8,410	5,821	6,132	13,981	34,344

Data source: California Housing Element Implementation and Annual Performance Report Data Dashboard, 2021.

For the purposes of the HOME-ARP QPs, the 6th cycle RHNA unit allocation indicates that the Consortium has a need for 5,603 housing units for households earning less than 30 percent AMI and 3,878 housing units for households earning between 30–50 percent AMI.

Assisted Rental Units at Risk of Conversion

Data from the City of Turlock's recent Housing Element Update reviewed data from the California Housing Partnership, which indicates that there are 396 assisted units that have upcoming subsidy expirations and are at risk of conversion to market-rate uses. The level of risk of conversion depends on the length of time an assisted unit has until subsidy expiration, which the Partnership classifies using a scale of low risk (risk of conversion in 10+ years), moderate risk (risk of conversion in 5 to 10 years), high risk (risk of conversion in 1 to 5 years), and very high risk (risk of conversion within the next year). Of the 396 identified units, 256 units are at moderate risk, 80 units are at high risk, and 60 units are at very high risk of losing their affordability.

The Consortium has several options for preserving or replacing at-risk units, including transfer of ownership, securing rental assistance for tenants, purchasing affordability covenants, and constructing replacement units. Each of these options requires dedicating local, state, or federal funding to preserve or replace units to ensure continued affordability.

Needs Identified Through Stakeholder Consultation and Survey

During the consultation sessions and survey, stakeholders noted unmet needs related to affordable rental housing and supportive services, including financial assistance to prevent evictions and to facilitate moves to rental housing units that better meet their needs. Many households remain precariously housed due to a tight rental market. Individuals and families are remaining in unaffordable housing because they are unable to secure alternative housing, due to either unaffordability or restrictive screening criteria that disproportionately impacts people with disabilities or legal issues. Even individuals and families with access to Housing Choice Vouchers or other tenant-based rental assistance are unable to obtain housing and vouchers are going unused.

In consultation sessions, stakeholders described a need for case management, legal services, food assistance, and transportation to support people at risk of homelessness or housing instability in maintaining housing. In the survey, stakeholders identified case management, housing search assistance and counseling, landlord and tenant liaison, mental health services, legal services, childcare, and employment assistance and job training as some of the top-needed supportive services for these individuals and families.

The quantitative data analysis on the needs facing individuals and families at risk of homelessness or housing instability emphasizes a need for increased inventory of affordable housing and expanded access to supportive services to help households maintain their housing. These needs align with the information gathered through the consultation sessions and survey, which indicated a high need for affordable rental housing and supportive services for these individuals and families.

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

Gaps Within the Current Affordable Rental Housing Inventory

The analysis of qualitative and quantitative data indicates that the development and preservation of affordable rental housing is a high priority for the Consortium, as there are an estimated 5,690 ELI renter households and 2,940 VLI renter households who pay over 50 percent of their income on housing costs. Data from the California Housing Partnership estimates that there are 2,186 assisted rental units currently in the Consortium and Turlock's Housing Element update indicates that there are 396 assisted units that are at risk of losing their affordability within the coming years. While the Consortium continues to make notable strides toward meeting the housing needs of the community, the Consortium has a long way to go to meet its current and upcoming RHNA unit allocation goals. Both the preservation and development of affordable rental housing require a

considerable investment of local, state, and federal funding, especially for high-cost markets such as Stanislaus County. One of the largest gaps in the Consortium's affordable housing inventory is securing long-term funding opportunities to meet the community's housing needs in the years to come.

Gaps in the Availability and Utilization of Rental Assistance

Quantitative data on the availability and use of rental assistance in the Consortium suggests that rental assistance is available for some, and voucher utilization rates vary widely by program. Data from HUD's Housing Choice Voucher Data Dashboard indicates that 96 percent of the Stanislaus Regional Housing Authority's Housing Choice Vouchers are currently being used and only 45 percent of the housing authority's 200 Emergency Housing Vouchers are being used. Since the Needs Assessment and Gaps Analysis identified that there were 5,690 ELI renter households and 2,940 VLI renter households with severe housing cost burden, there appears to be a clear need for rental assistance support in the Consortium. Variations in voucher utilization rates likely reflect challenges in using vouchers on the private market rather than changes in the need for rental assistance in Stanislaus County.

Need for Supportive Housing Options

The HMIS data analysis on the size and demographic composition of individuals experiencing homelessness in Turlock and Stanislaus Urban County in 2021 indicates that there were 1,321 individuals with disabling conditions, 1,112 of whom were also chronically homeless. The Consortium's assessment of 2022 Housing Inventory Count data indicates there are only six permanent supportive housing beds in Turlock and none in Stanislaus Urban County. There are an additional 634 permanent supportive housing beds in Modesto, but the current number of units is insufficient to meet the needs of the number of chronically homeless individuals in the community who would be eligible for and benefit from supportive housing. Considering that 21 percent of exits from the homeless response system were to non-permanent housing situations and 23 percent of individuals surveyed in the Point-in-Time count had previously experienced homelessness, there is a clear need for expanded housing options with wraparound supportive services to provide the stability and support for members of the community to secure and maintain long-term permanent housing.

Identify priority needs for QPs.

Figure 16 summarizes the priority needs facing the four HOME-ARP QPs based on the information gathered through the consultation sessions, online stakeholder survey, and quantitative data analysis.

Figure 16: Priority Needs for the HOME-ARP QPs

Individuals Experiencing Homelessness

- There is a high need for supportive housing as well as a variety of permanent affordable housing options. Greater need exists for individuals with long histories of homelessness, disabilities, and other marginalized identities.
- There is a need for expanded outreach, navigation, and ongoing case management, particularly for individuals with multiple barriers to housing.
- Supportive services needs include housing search assistance and counseling, case management, mental health services, substance use treatment services, and food assistance.

Individuals at Risk of Homelessness

- There is a high need for a variety of affordable housing options including units that are accessible to individuals with physical disabilities.
- There is need for assistance for the high number of ELI renter households who are severely cost-burdened.
- Supportive services needs include case management, housing search assistance and counseling, mental health services, landlord/tenant liaising, and employment assistance and job training.

Persons Fleeing/Attempting to Flee

- There is a high need for a variety of housing and shelter options to support victims with different needs.
- While there are services available for sex trafficking survivors, services for labor trafficking survivors are very limited.
- Supportive services needs include victim services, case management, childcare, legal services, and mental health services.

Other Groups at Greatest Risk of Homelessness/Housing Instability

- There is a high need for a variety of affordable housing options including units that are accessible to individuals with physical disabilities.
- There is need for assistance for the VLI renter households who are severely cost-burdened.
- There is need to provide targeted services for individuals who are undocumented and facing specific challenges including stolen wages, overcrowded housing, and barriers to securing housing in the private market.
- Supportive services needs include case management, housing search assistance and counseling, landlord/tenant liaison, childcare, and legal services.

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

The Consortium paired the qualitative information gathered from the stakeholder consultation sessions and survey with insights gleaned from quantitative data analysis to better understand the needs facing each of the QPs and gaps in the shelter, housing, and service delivery systems. Table 37 outlines the primary qualitative and quantitative data sources the Consortium used to analyze the priority needs of each QP as well as the housing, shelter, and service gaps across Turlock and Stanislaus Urban County.

Table 35: Primary Quantitative Data Sources to Determine Needs and Gaps

HOME-ARP QP	Primary Data Sources
Individuals experiencing homelessness	<ul style="list-style-type: none"> • CoC HMIS/Point-in-Time count (2022) • Stanislaus Homeless Alliance and Stanislaus Community System of Care, Regional Homeless Strategic Plan (2021) • Stanislaus Community System of Care Homeless Point-in-Time count County Summary (2022) • Stakeholder consultation sessions and online stakeholder survey
Individuals at risk of homelessness	<ul style="list-style-type: none"> • CHAS (2015–2019) • McKinney-Vento EDFacts Initiative (school year 2019–2020) • Stanislaus Regional Housing Authority and Housing Authority of the City of Riverbank data (2021) • Stakeholder consultation sessions and online stakeholder survey
Persons fleeing/attempting to flee domestic violence, sexual assault, dating violence, stalking, or human trafficking	<ul style="list-style-type: none"> • CoC HMIS/Point-in-Time count data (2022) • HAVEN client data (2022) • Center for Human Services client data (2022) • California Department of Justice, Domestic Violence-Related Calls for Service (2019–2021) • Stakeholder consultation sessions and online stakeholder survey
Other populations at risk of housing instability and homelessness	<ul style="list-style-type: none"> • CHAS (2015–2019) • American Community Survey (2017–2021) • 2020–2024 Consolidated Plan • Stakeholder consultation sessions and online

	stakeholder survey
Topic	Primary Data Sources
Housing inventory	<ul style="list-style-type: none"> • California Housing Partnership, Affordable Housing Map (2022) • CHAS (2015–2019) • Turlock 6th Housing Element Update (2022) • Consortium program data (2022) • Stakeholder consultation sessions and online stakeholder survey
Shelter inventory	<ul style="list-style-type: none"> • CoC HMIS/Housing Inventory Count (2022) • Consortium program data (2022) • Stakeholder consultation sessions and online stakeholder survey
Service delivery system	<ul style="list-style-type: none"> • Consortium program data (2022) • Stakeholder consultation sessions and online stakeholder survey

HOME-ARP Activities

Regulatory Requirements

In accordance with [Section V.C.2. of the Notice](#), PJs must describe how they will distribute HOME-ARP funds aligned with the identified priority needs and the method for soliciting applications for funding and selecting developers, service providers, subrecipients, and/or contractors. Furthermore, PJs must describe whether they will administer the HOME-ARP-eligible activities directly.

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

Affordable Housing Development

Funding will be allocated through a competitive application process open to all eligible entities, including non-profit, for-profit, and public developers. To be considered eligible for program funds, the Consortium will require that recipients, at a minimum meet the following criteria:

- Make acceptable assurances to the Consortium that it will comply with the requirements of the HOME-ARP during the entire period that begins upon selection of the recipient to receive HOME-ARP funds and ends upon the conclusion of all HOME-ARP-funded activities.
- Demonstrate the ability and financial capacity to undertake, comply with, and manage the eligible activity.
- Demonstrate its familiarity with the requirements of other federal, state, or local housing programs that may be used in conjunction with HOME-ARP funds to ensure compliance with all applicable requirements and regulations of such programs.
- Have demonstrated experience and capacity to conduct HOME-ARP-eligible activities as evidenced by its ability to own, construct, or rehabilitate—and manage and operate—an affordable multifamily rental housing development.

Supportive Services

Funding will be allocated through a competitive application process open to all eligible entities, including public and non-profit service providers. To be considered eligible for program funds, the Consortium will require that recipients, at a minimum, meet the following criteria:

- Make acceptable assurances to the Consortium that it will comply with the requirements of the HOME-ARP during the entire period that begins upon selection

of the recipient to receive HOME-ARP funds and ends upon the conclusion of all HOME-ARP-funded activities.

- Demonstrate the ability and financial capacity to undertake, comply with, and manage the eligible activity.
- Demonstrate its familiarity with the requirements of other federal, state, or local services programs that may be used in conjunction with HOME-ARP funds to ensure compliance with all applicable requirements and regulations of such programs.
- Have demonstrated experience and capacity to conduct HOME-ARP-eligible activities as evidenced by its ability to effectively serve QPs.

Non-Profit Capacity-Building and Operating Support

Non-profit operating support will be provided to non-profit housing developers or supportive services providers that receive a direct allocation of HOME-ARP.

Describe whether the PJ will administer eligible activities directly.

The Consortium may directly administer affordable housing development funding. They will not directly administer supportive services or non-profit capacity-building and operating support.

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

This section is not applicable to the Consortium.

Use of HOME-ARP Funding

Regulatory Requirements

[Section V.C.2 of the Notice](#) states that PJs must outline the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The plan must also explain how the characteristics of its shelter and housing inventory, service delivery system, and the needs identified in the Needs Assessment and Gaps Analysis provided a rationale for the PJ's plan to fund eligible activities.

Table 36: Distribution of HOME-ARP Funds Across Eligible Activities

	Funding Amount	Percent of Grant	Statutory Limit
Supportive services	\$700,000	13%	
Acquisition and development of non-congregate shelters	\$0	0%	
Tenant-based rental assistance	\$0	0%	
Development of affordable rental housing	\$3,524,907	66%	
Non-profit operating	\$150,000	3%	5%
Non-profit capacity building	\$150,000	3%	5%
Administration and planning	\$798,513	15%	15%
Total HOME-ARP allocation	\$5,323,420	100%	

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

The Consortium intends to use 66 percent of its HOME-ARP allocation for affordable rental housing, 13 percent for supportive services, 3 percent each for non-profit operating and capacity building support, and the remaining 15 percent for grantee planning and administration activities. This funding distribution will allow the Consortium to focus its resources and capacity on expanding affordable rental housing options. This allocation also provides resources to expand the Consortium's own capacity to support successful and sustainable affordable housing developments and supportive services for HOME-ARP QPs in Turlock and Stanislaus Urban County. These uses of HOME-ARP funds are consistent with the needs identified through consultations and data analysis.

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

Information analyzed from the consultation sessions, stakeholder survey, and quantitative data demonstrates that there are high levels of unmet needs faced by all four of the HOME-ARP QPs. Although the Consortium will receive a HOME-ARP allocation of over \$5.3 million, even this amount is insufficient to completely address the housing, shelter, and service needs for each of the QPs. Given the limited resources available, as well as the major themes underscored in the Needs Assessment and Gaps Analysis, the Consortium plans to spend 66 percent of its HOME-ARP allocation on affordable rental housing, 13 percent on supportive services, 3 percent each on non-profit operating and capacity building support, and the remaining 15 percent on administration and planning.

The trends identified in the Needs Assessment and Gaps Analysis were a major factor that led to the Consortium's HOME-ARP allocation distribution decision. The major trends highlighted in the data analysis, consultation sessions, and survey responses all pointed to a significant need for affordable rental housing for each of the HOME-ARP QPs. Stakeholders described how all four of the HOME-ARP QPs struggle to find housing that is affordable and accessible in the community. Housing costs have been increasing for years, but recent events including the COVID-19 pandemic and the end of the eviction moratorium have exacerbated housing cost burden and housing instability for many lower-income households in Turlock and Stanislaus Urban County. The stakeholder survey found that 72 percent of respondents selected affordable rental housing as their top priority for the use of HOME-ARP funds. The data from the Needs Assessment and Gaps Analysis, therefore, indicates that there is a considerable need for the development of additional affordable rental housing opportunities in Turlock and Stanislaus Urban County.

The Needs Assessment and Gaps Analysis also highlighted the need for and importance of supportive services for the four HOME-ARP QPs. Point-in-Time count data showed the number of people whose homelessness could have been prevented or more quickly ended if they had access to effective services. In the consultation sessions and open-ended survey responses, stakeholders spoke about individuals experiencing homelessness, housing instability, and/or violence getting lost in the system while seeking housing. As described above, affordable and accessible housing is very limited and individuals need supportive services to help navigate the system, advocate for acceptance to housing, and provide case management throughout their homeless experience and as they obtain and maintain housing stability.

In the survey, stakeholders underscored the need for additional supportive services for each HOME-ARP QPs. Notably, housing search assistance and case management were identified among the highest service needs for all four QPs. Mental health services were also ranked highly for three of four QPs. Survey respondents were not offered the option to rank one-time financial assistance and short- or medium-term rental assistance, but several respondents shared freely about the need for homelessness prevention financial assistance.

In order to successfully implement affordable rental housing and supportive services for the QPs, it is necessary to expand the capacity of service providers and affordable housing developers. Consultation participants described how challenges such as insufficient pay for staff, lack of staff training opportunities, and limited program funding and resources have made it harder for organizations to support their own staff and capacity while adequately meeting the needs of their clients. By allocating HOME-ARP funding toward nonprofit operating and capacity building, the Consortium aims to help address some of the challenges faced by organizations working to meet the needs of the QPs. There is also a need to form new partnerships and linkages among organizations, particularly with victims' services providers, culturally specific providers, and affordable housing developers.

The remaining 15 percent of the HOME-ARP allocation will assist the Consortium with the administration and planning of the HOME-ARP program. Eligible administration and planning costs include necessary costs for the management, coordination, monitoring, and evaluation of the HOME-ARP program. Eligible costs could include administration activities such as developing systems to comply with HOME-ARP requirements, developing interagency agreements, monitoring HOME-ARP activities for progress and compliance, preparing HOME-ARP reports and documents for submission to HUD, and evaluating program results against stated objectives. A full list of eligible costs is provided in Section VI.A of the HUD Notice. Since the HOME-ARP program is a new source of federal funding with its own unique program requirements, the Consortium has elected to allocate

sufficient funds to build its own internal capacity to administer, monitor, and evaluate the program. Doing so will help ensure that the HOME-ARP-eligible activities have the greatest impact and best meet the needs of some of Turlock's and Stanislaus Urban County's most vulnerable communities.

HOME-ARP Production Housing Goals

Regulatory Requirements

In accordance with [Section V.C.3 of the Notice](#), PJs must provide an estimate for the number of affordable rental housing units for QPs that they will produce or support with HOME-ARP funds. In addition, PJs must also include a narrative about the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs.

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

The Consortium estimates that with no additional resources and an assumed cost of \$450,000 per unit, about eight affordable rental housing units will be rehabilitated or produced with HOME-ARP resources. The number of impacted units could increase if other funds are available to pay for a portion of unit costs.

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

HOME-ARP funds will provide a one-time expansion of resources for the development of affordable rental housing for some of Turlock's and Stanislaus Urban County's most vulnerable residents. Prioritizing the development of affordable rental housing aligns with the needs for all four HOME-ARP QPs identified in the Needs Assessment and Gaps Analysis and will further the Consortium's goal of expanding affordable housing options for ELI and VLI households. While the estimated number of units that will be produced with the HOME-ARP allocation is a small step forward, it will help make a long-term impact with a one-time source of funding. The funds will likely leverage state and federal funds for affordable housing and fill important gaps to allow a project or projects to move forward.

Preferences

Regulatory Requirements

[Section V.C.4 of the Notice](#) states that PJs must identify whether they intend to establish a preference for one or more of the QPs or a subpopulation within one or more of the QPs for any eligible activity or project. If a PJ chooses to establish a preference, it must explain how the use of a preference or method of prioritization will address the unmet needs or gaps in benefits and services identified in the Needs Assessment and Gaps Analysis. PJs must also describe how they will still address the unmet needs or gaps of the other QPs that are not included in a preference through the use of HOME-ARP funds.

Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

Identify whether the PJ intends to give preference to one or more QPs or a subpopulation within one or more QPs for any eligible activity or project.

The Consortium will not establish any preference for HOME-ARP activities.

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 QP or subpopulation of the QP, consistent with the PJ's needs assessment and gap analysis.

This section is not applicable to the Consortium.

Referral Methods

Regulatory Requirements

The HUD Notice states that PJs are not required to describe referral methods in the HOME-ARP Allocation Plan; however, a PJ must require a project or activity to use coordinated entry along with other referral methods **or** to use only a project/activity waiting list if:

- Coordinated entry does not have a sufficient number of qualifying individuals or families to refer to the PJ for the project or activity.
- Coordinated entry does not include all HOME-ARP QPs.
- Coordinated entry fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the coordinated entry system.

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

The Consortium will use a project-specific waiting list for all HOME-ARP-funded projects and programs.

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

This section is not applicable to the Consortium.

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

This section is not applicable to the Consortium.

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

This section is not applicable to the Consortium.

Limitations in a HOME-ARP Rental Housing or Non-Congregate Shelter Project

Regulatory Requirements

The HUD Notice states that limiting eligibility for HOME-ARP rental housing or non-congregate shelter projects is only permitted under certain circumstances. For example, PJs may limit admission to HOME-ARP rental housing or non-congregate shelter projects to households who need specialized supportive services that are provided in such housing or non-congregate shelter. Any limitations must follow all applicable fair housing, civil rights, and nondiscrimination requirements.

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or non-congregate shelter project to a particular QP or specific subpopulation of a QP identified in section IV.A of the Notice.

The Consortium will not limit eligibility to any QP or subpopulation.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the QP or subpopulation of the QP, consistent with the PJ's needs assessment and gap analysis.

This section is not applicable to the Consortium.

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

This section is not applicable to the Consortium.

HOME-ARP Refinancing Guidelines

Regulatory Requirements

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

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

The Consortium does not intend to use HOME-ARP funds for this purpose.

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.

The Consortium does not intend to use HOME-ARP funds for this purpose.

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

The Consortium does not intend to use HOME-ARP funds for this purpose.

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

The Consortium does not intend to use HOME-ARP funds for this purpose.

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

The Consortium does not intend to use HOME-ARP funds for this purpose.

Other requirements in the PJ's guidelines, if applicable.

The Consortium does not intend to use HOME-ARP funds for this purpose.

Appendix

Includes:

- Acronyms list
- Consultation Process Organization Table
- Stakeholder Survey Multiple Choice Summary Results
- Public Participation Supporting Documentation

Acronyms List

Acronym	Definition
AMI	Area Median Income
CHAS	Comprehensive Housing Affordability Strategy
CoC	Continuum of Care
ELI	Extremely Low-Income
HAMFI	HUD-Adjusted Median Family Income
HMIS	Homeless Management Information System
HOME	HOME Investment Partnership Program
HOME-ARP	HOME American Rescue Plan Program
HUD	U.S. Department of Housing and Urban Development
PJ	HOME Participating Jurisdiction
QP	Qualifying Population
RHNA	Regional Housing Needs Assessment
VLI	Very Low-Income

Consultation Process Organization Table

The following table includes the 33 organizations that provided input in the development of the HOME-ARP Allocation Plan through the consultation sessions and online stakeholder survey. The organization types were determined either by the organization types selected by the respondent(s) affiliated with an organization in the stakeholder survey or by Consortium staff based on their understanding of the services provided by the organization. Likewise, the QPs served were determined by the QPs indicated by the respondent(s) affiliated with an organization in the stakeholder survey or by Consortium staff based on their understanding of the individuals served by the organization.

The organization table uses the following abbreviations for organization type and QP served.

Abbreviation	Definition
CoC	Continuum of Care serving the jurisdiction's geographic area; includes Collaborative Applicant and Advisory Committee representatives
Local Gov't	Local government serving QPs in Stanislaus County (city or county)
HSP	Homeless service provider, including shelter, housing, and supportive services
VSP	Domestic violence, dating violence, sexual assault, stalking, and/or human trafficking victim services provider
V	Groups serving or representing veterans
PHA	Public housing authority
PA	Public agency addressing the needs of the QPs
FH/CR/D	Public or private organizations that address fair housing, civil rights, and/or the needs of persons with disabilities
D	Affordable housing developer
O	Other organizations that address the needs of the QPs (not public agencies)

Abbreviation	QP
QP1	Individuals experiencing homelessness
QP2	Individuals at risk of homelessness
QP3	Persons fleeing or attempting to flee domestic violence, sexual assault, dating violence, stalking, or human trafficking
QP4	Other populations at greatest risk of homelessness or housing instability

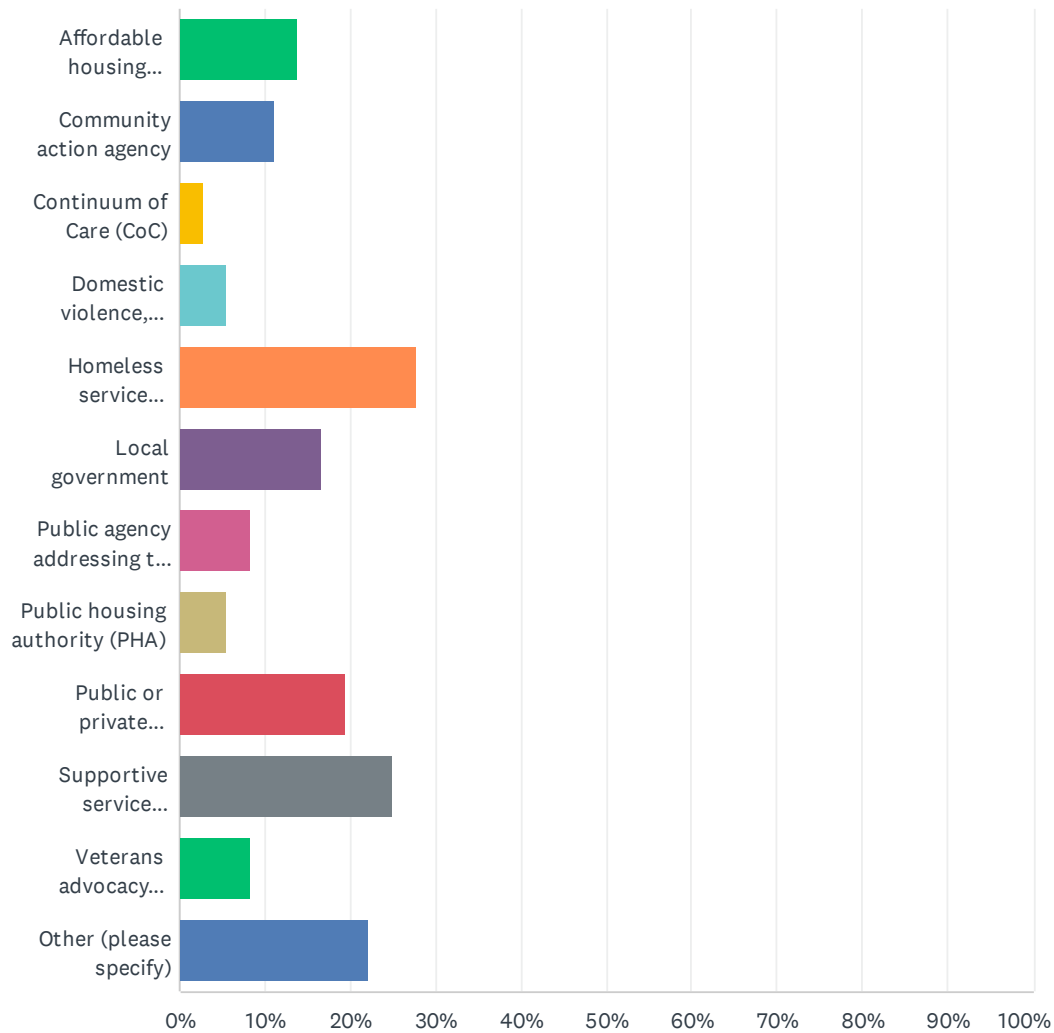
Consultation Process Organization Table

Organization	CoC	Local Gov't	HSP	VSP	Veteran	PHA	Public	FH/CR/PWD	AHD	Other	QP1	QP2	QP3	QP4
California Phones								X		X	X	X	X	X
California Rural Legal Assistance								X			X	X	X	X
Center for Human Services			X								X	X		X
Central Valley Opportunity Center			X								X	X		X
Children's Crisis Center				X						X			X	
City of Modesto		X									X	X	X	X
City of Newman		X					X				X			
City of Oakdale		X					X				X	X	X	X
City Of Patterson		X					X				X			
City of Riverbank		X					X				X	X		X
City of Waterford		X					X					X		
Community Housing and Shelter Services			X								X	X		X
Community Impact Central Valley			X								X			
Department of Veterans Affairs			X		X		X				X	X		X
Disability Resources Agency for Independent Living			X					X		X	X	X	X	X
EAH Housing									X		X	X		X
Habitat for Humanity, Stanislaus									X			X		X
HAVEN				X									X	
Health Net										X	X	X	X	X
Health Plan of San Joaquin										X	X	X	X	X
Housing Authority of the City of Riverbank						X	X				X	X	X	X
LGBTQ Collaborative								X		X	X	X	X	X
Modesto Gospel Mission			X								X	X		X
Oakdale Rescue Mission			X								X	X		X
Project Sentinel								X			X	X	X	X
Self-Help Enterprises									X		X	X		X
Stanislaus County	X	X	X				X			X	X	X	X	X
Stanislaus Regional Housing Authority						X	X				X	X	X	X
Turlock Gospel Mission			X	X							X	X	X	X
Turning Point Community Programs			X							X	X	X	X	X
United Samaritans Foundation										X	X	X	X	X
Valley Mountain Regional Center								X		X	X	X	X	X
We Care Program—Turlock			X								X	X		
Total	1	7	12	3	1	2	9	6	3	10	29	28	18	26

Stakeholder Survey Multiple Choice Summary Results

Q2 What type of organization do you work for? (Check all that apply)

Answered: 36 Skipped: 0

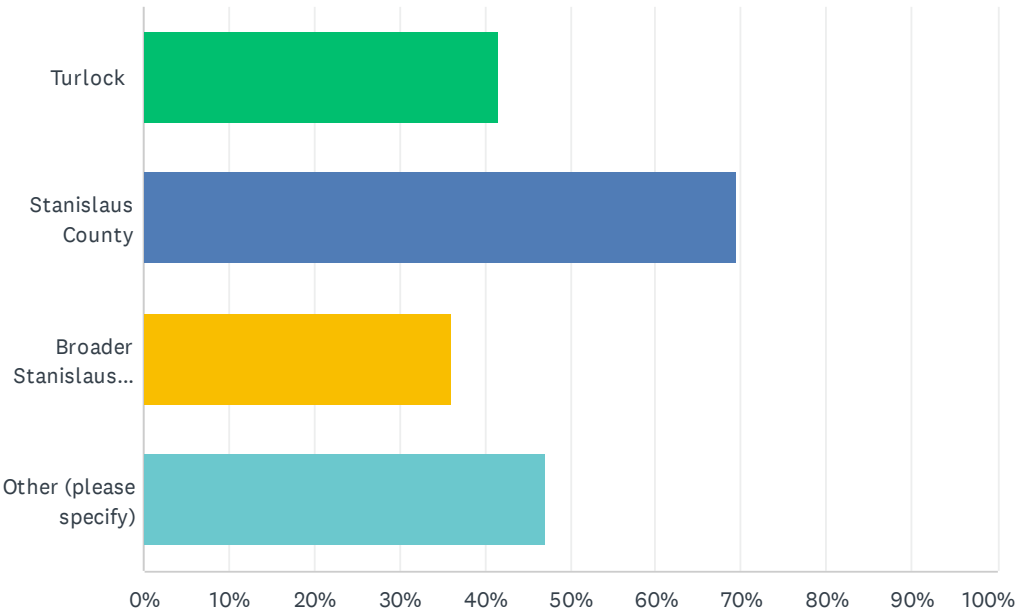


Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey

ANSWER CHOICES	RESPONSES	
Affordable housing developer	13.89%	5
Community action agency	11.11%	4
Continuum of Care (CoC)	2.78%	1
Domestic violence, dating violence, sexual assault, stalking, or human trafficking service provider	5.56%	2
Homeless service provider	27.78%	10
Local government	16.67%	6
Public agency addressing the needs of the qualifying populations	8.33%	3
Public housing authority (PHA)	5.56%	2
Public or private organization addressing civil rights, fair housing, and/or the needs of persons with disabilities	19.44%	7
Supportive service provider	25.00%	9
Veterans advocacy organization or service provider	8.33%	3
Other (please specify)	22.22%	8
Total Respondents: 36		

Q3 Which area(s) does your organization serve? (Check all that apply)

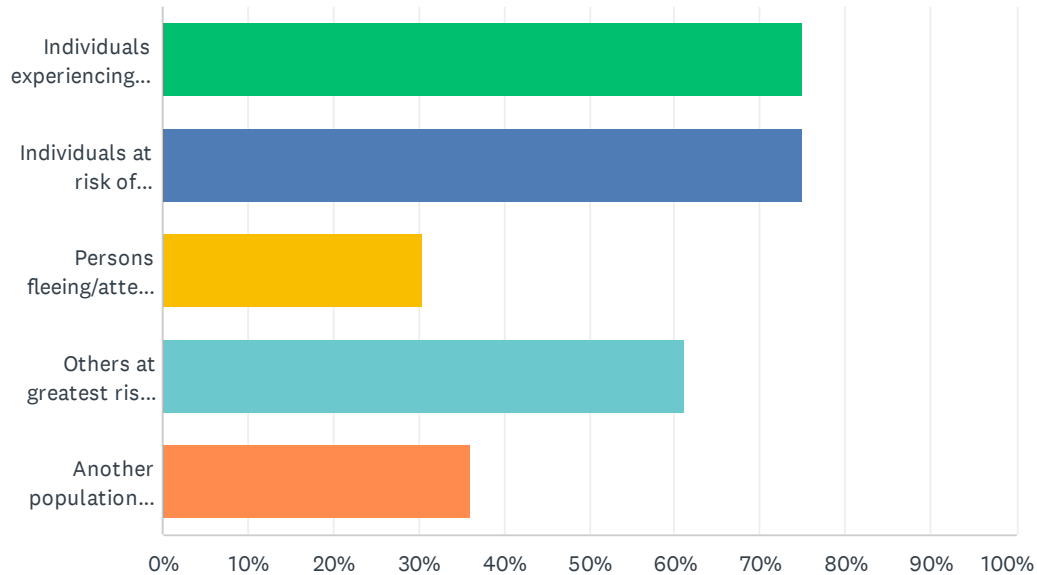
Answered: 36 Skipped: 0



ANSWER CHOICES	RESPONSES	
Turlock	41.67%	15
Stanislaus County	69.44%	25
Broader Stanislaus County region	36.11%	13
Other (please specify)	47.22%	17
Total Respondents: 36		

Q4 What HOME-ARP qualifying population(s) does your organization primarily serve? (Check all that apply)

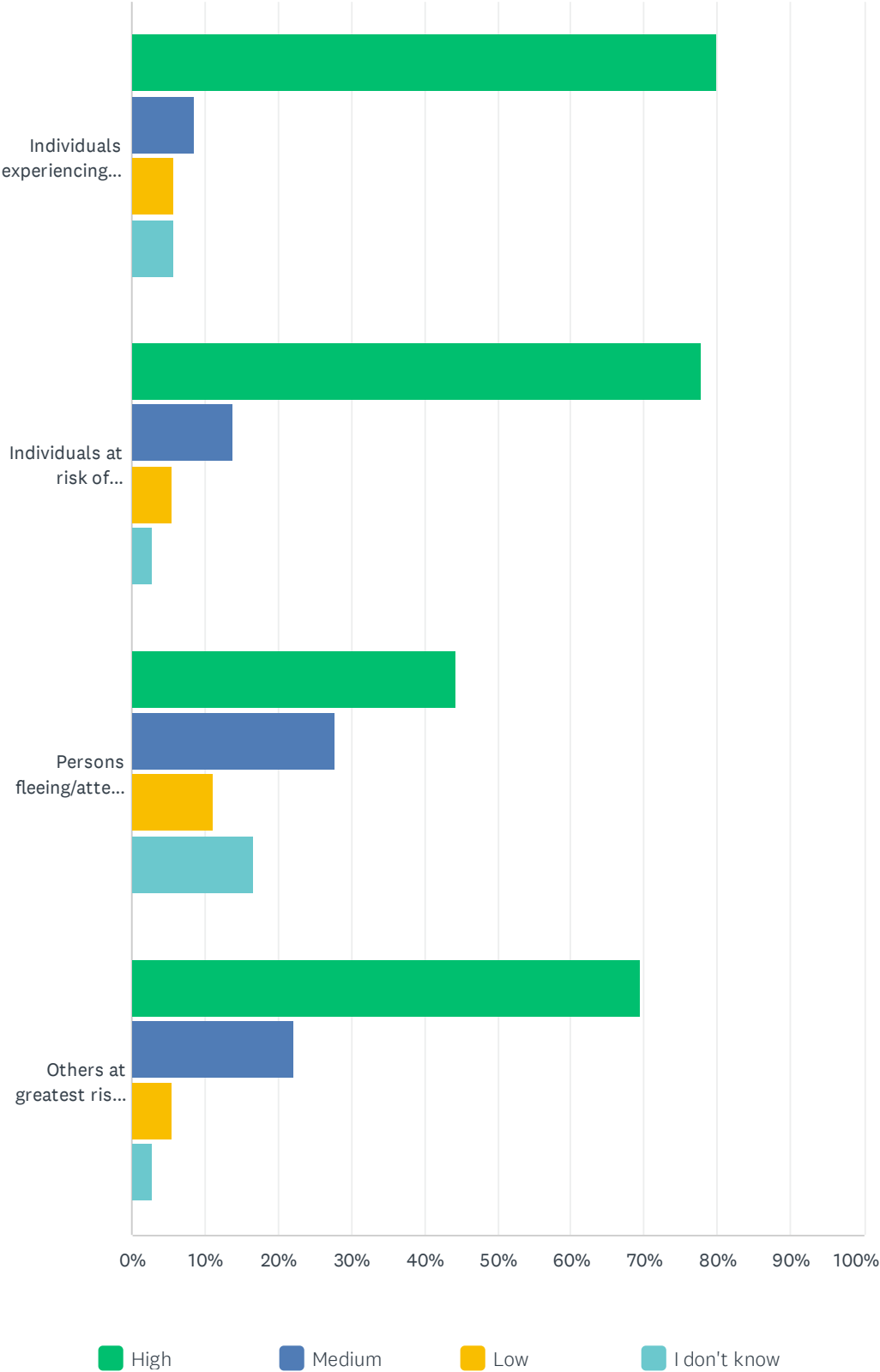
Answered: 36 Skipped: 0



ANSWER CHOICES	RESPONSES	
Individuals experiencing homelessness	75.00%	27
Individuals at risk of homelessness	75.00%	27
Persons fleeing/attempting to flee domestic violence, sexual assault, stalking, or human trafficking	30.56%	11
Others at greatest risk of homelessness or housing instability	61.11%	22
Another population (please specify)	36.11%	13
Total Respondents: 36		

Q5 How would you describe the overall level of need for each HOME-ARP qualifying population using a scale of High, Medium, and Low?

Answered: 36 Skipped: 0

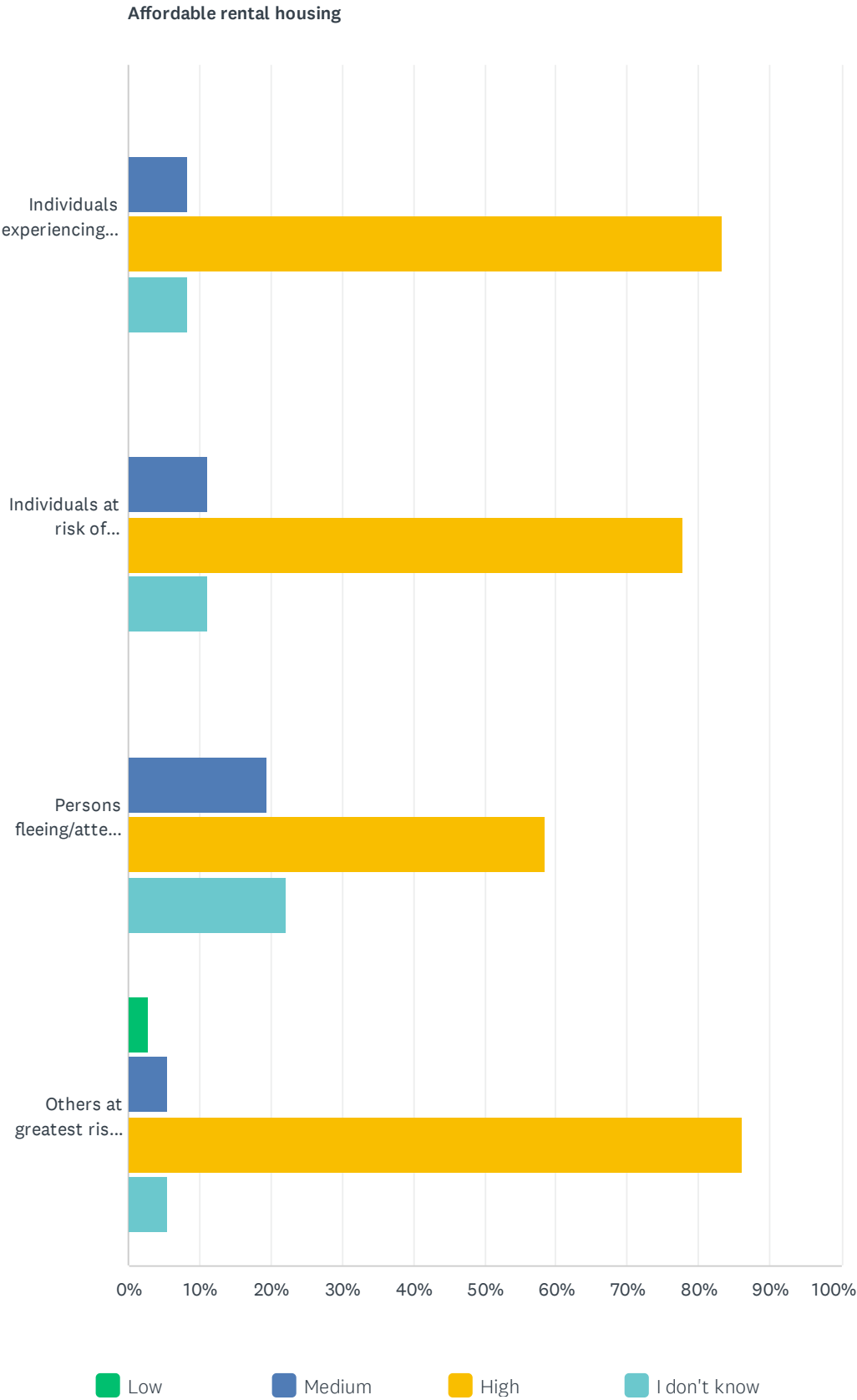


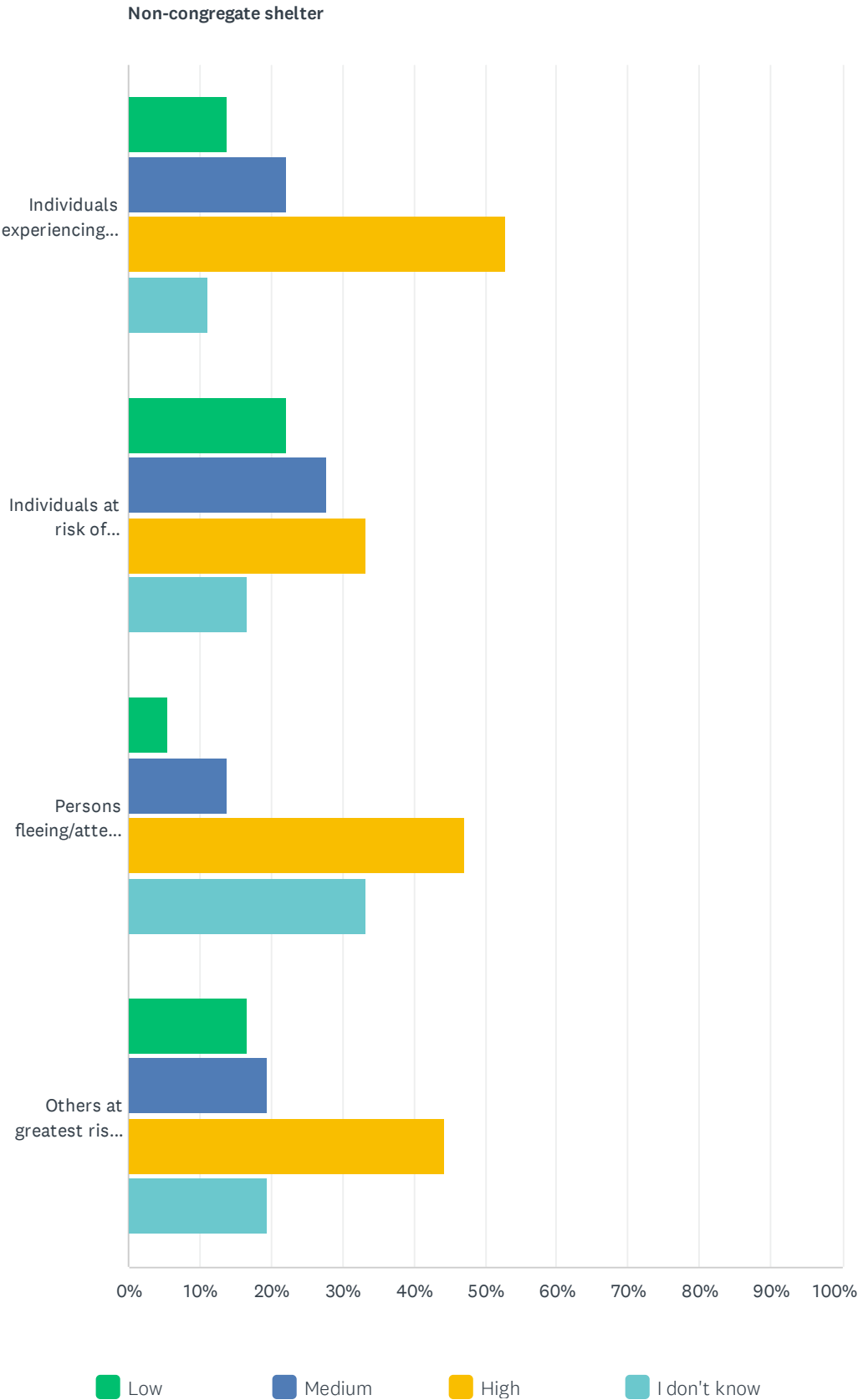
Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey

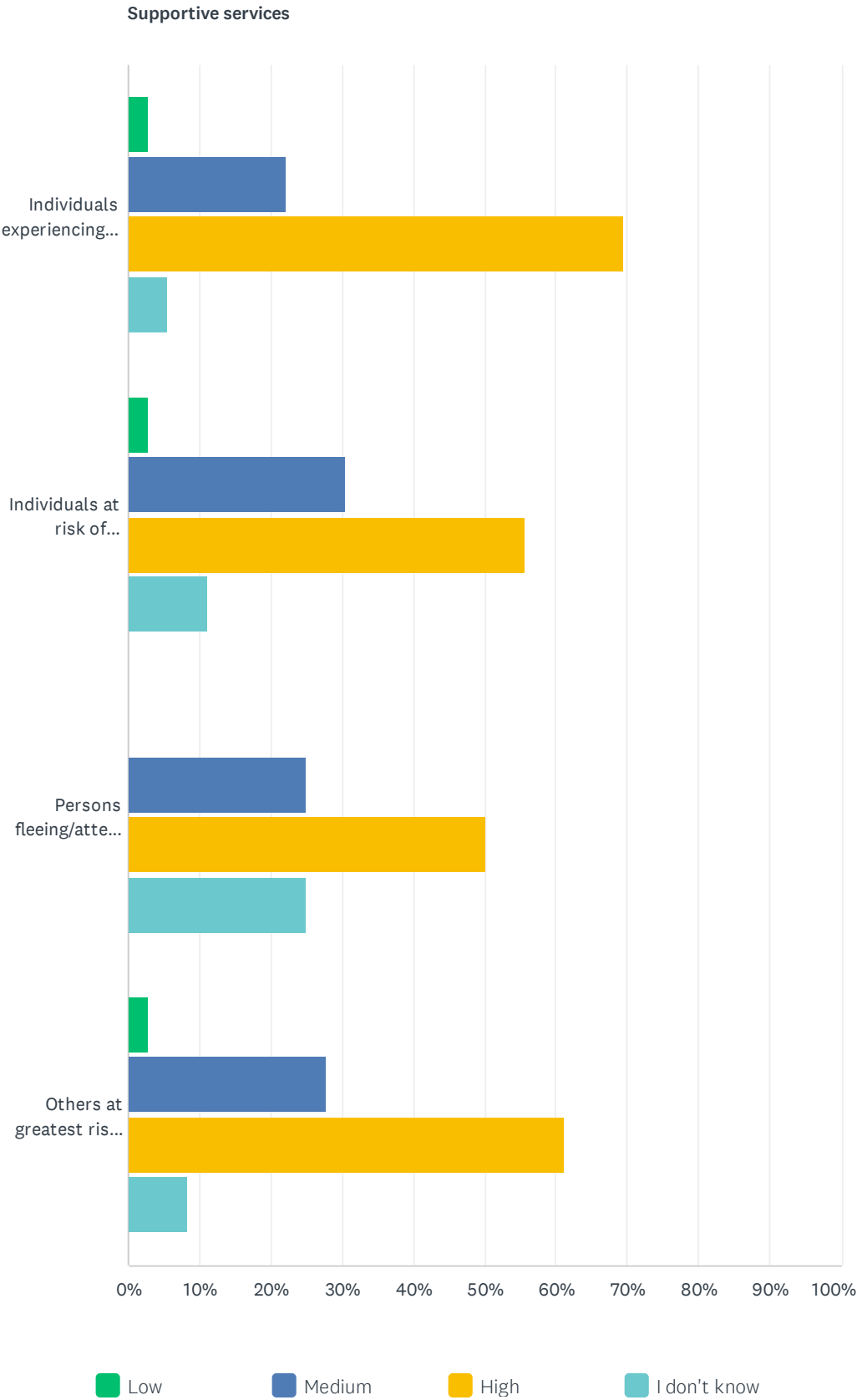
	HIGH	MEDIUM	LOW	I DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Individuals experiencing homelessness	80.00% 28	8.57% 3	5.71% 2	5.71% 2	35	1.21
Individuals at risk of homelessness	77.78% 28	13.89% 5	5.56% 2	2.78% 1	36	1.26
Persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	44.44% 16	27.78% 10	11.11% 4	16.67% 6	36	1.60
Others at greatest risk of homelessness or housing instability	69.44% 25	22.22% 8	5.56% 2	2.78% 1	36	1.34

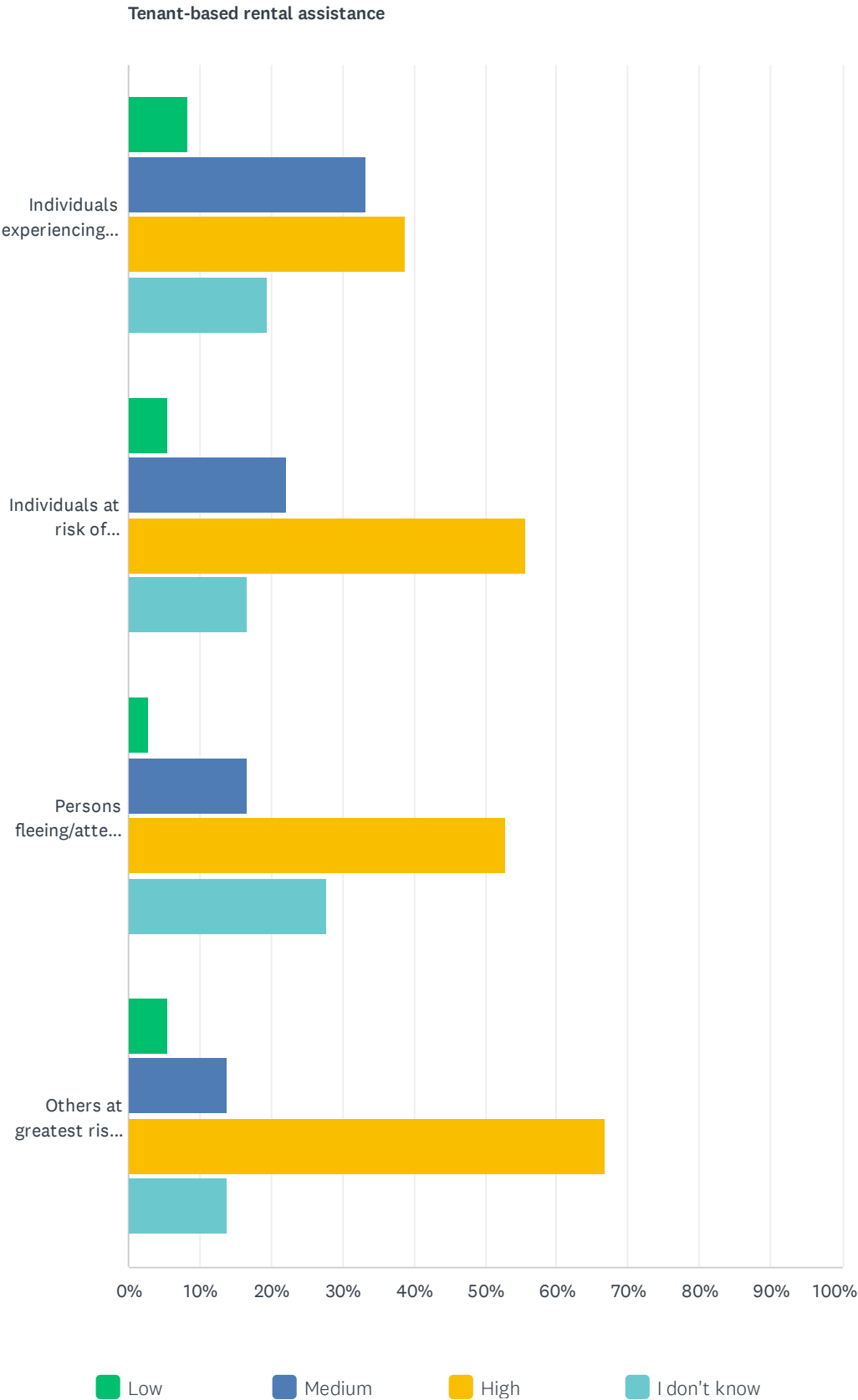
Q6 What are the unmet needs for the following eligible activities for each of the HOME-ARP qualifying populations using a scale of High, Medium, and Low?*Note: non-congregate shelters generally include one bathroom for each bedroom*

Answered: 36 Skipped: 0







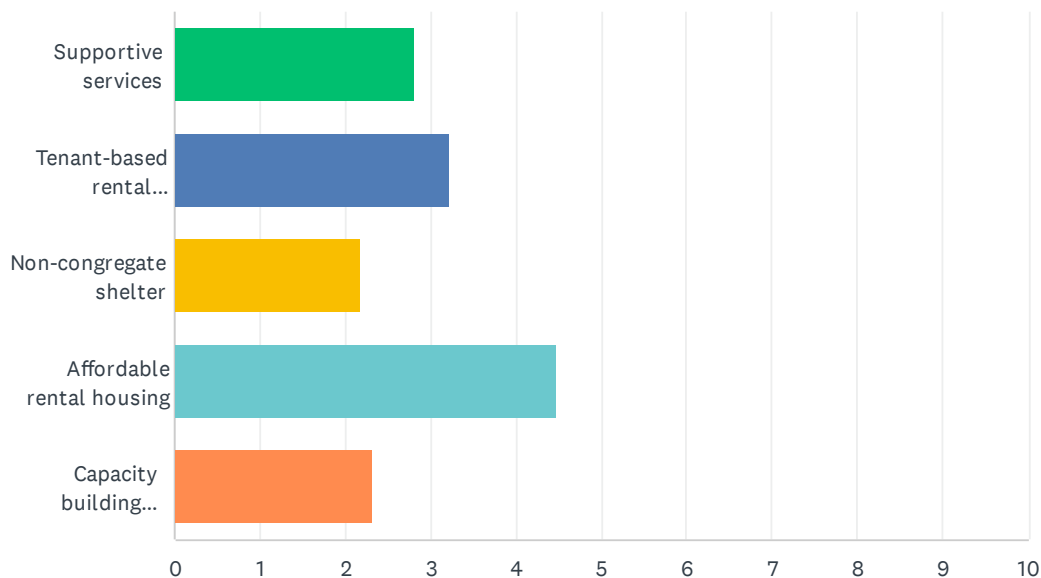


Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey

Affordable rental housing					
	LOW	MEDIUM	HIGH	I DON'T KNOW	TOTAL
Individuals experiencing homelessness	0.00% 0	8.33% 3	83.33% 30	8.33% 3	36
Individuals at risk of homelessness	0.00% 0	11.11% 4	77.78% 28	11.11% 4	36
Persons fleeing/attempting to flee domestic violence, dating violence, stalking, sexual assault, or human trafficking	0.00% 0	19.44% 7	58.33% 21	22.22% 8	36
Others at greatest risk of homelessness or housing instability	2.78% 1	5.56% 2	86.11% 31	5.56% 2	36
Non-congregate shelter					
	LOW	MEDIUM	HIGH	I DON'T KNOW	TOTAL
Individuals experiencing homelessness	13.89% 5	22.22% 8	52.78% 19	11.11% 4	36
Individuals at risk of homelessness	22.22% 8	27.78% 10	33.33% 12	16.67% 6	36
Persons fleeing/attempting to flee domestic violence, dating violence, stalking, sexual assault, or human trafficking	5.56% 2	13.89% 5	47.22% 17	33.33% 12	36
Others at greatest risk of homelessness or housing instability	16.67% 6	19.44% 7	44.44% 16	19.44% 7	36
Supportive services					
	LOW	MEDIUM	HIGH	I DON'T KNOW	TOTAL
Individuals experiencing homelessness	2.78% 1	22.22% 8	69.44% 25	5.56% 2	36
Individuals at risk of homelessness	2.78% 1	30.56% 11	55.56% 20	11.11% 4	36
Persons fleeing/attempting to flee domestic violence, dating violence, stalking, sexual assault, or human trafficking	0.00% 0	25.00% 9	50.00% 18	25.00% 9	36
Others at greatest risk of homelessness or housing instability	2.78% 1	27.78% 10	61.11% 22	8.33% 3	36
Tenant-based rental assistance					
	LOW	MEDIUM	HIGH	I DON'T KNOW	TOTAL
Individuals experiencing homelessness	8.33% 3	33.33% 12	38.89% 14	19.44% 7	36
Individuals at risk of homelessness	5.56% 2	22.22% 8	55.56% 20	16.67% 6	36
Persons fleeing/attempting to flee domestic violence, dating violence, stalking, sexual assault, or human trafficking	2.78% 1	16.67% 6	52.78% 19	27.78% 10	36
Others at greatest risk of homelessness or housing instability	5.56% 2	13.89% 5	66.67% 24	13.89% 5	36

Q7 How would you prioritize the use of HOME-ARP funds among the following eligible activities? Please rank the following with a 1 as the highest priority.

Answered: 36 Skipped: 0

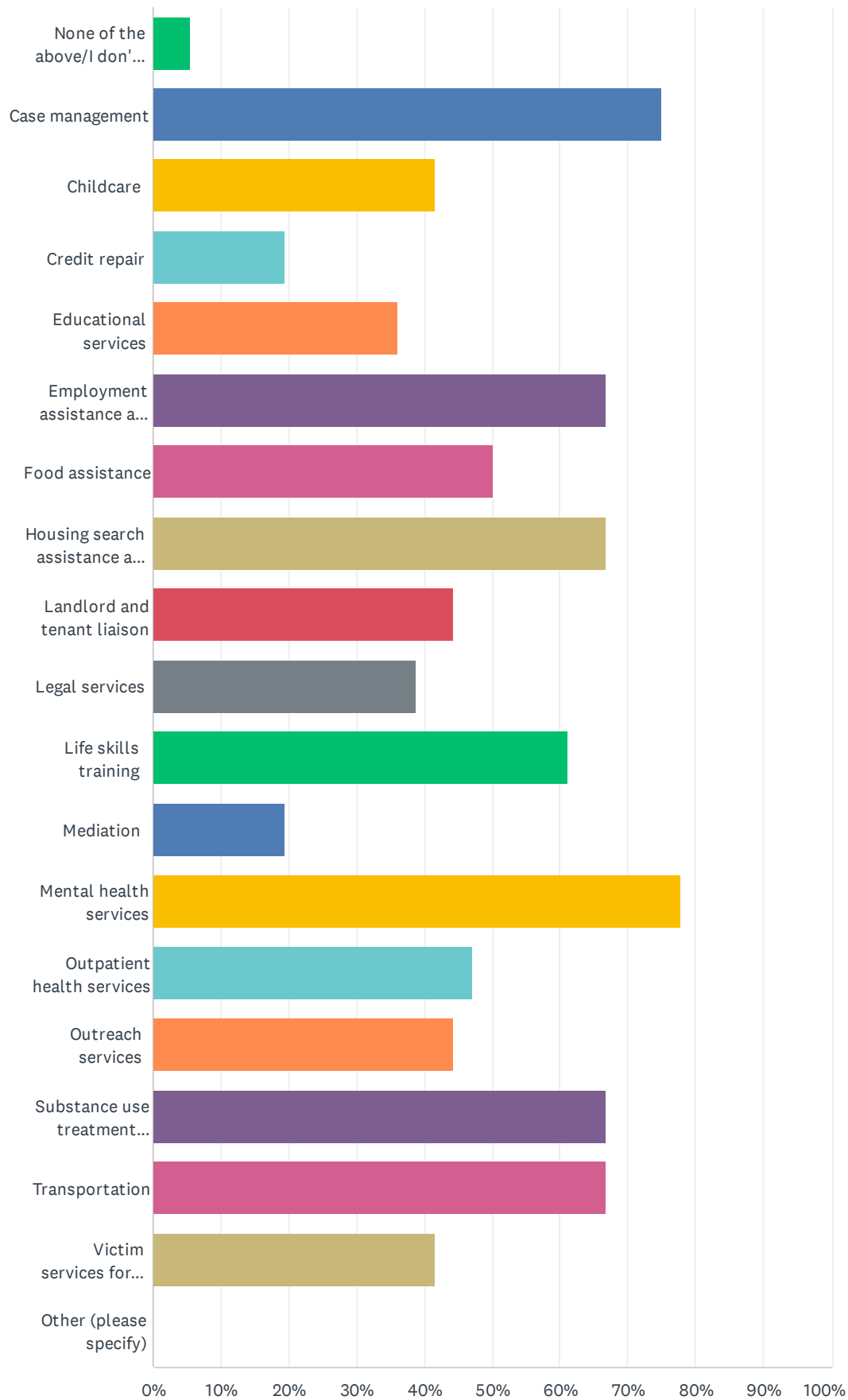


	1	2	3	4	5	TOTAL	SCORE
Supportive services	8.33% 3	16.67% 6	41.67% 15	13.89% 5	19.44% 7	36	2.81
Tenant-based rental assistance	8.33% 3	36.11% 13	36.11% 13	8.33% 3	11.11% 4	36	3.22
Non-congregate shelter	8.33% 3	8.33% 3	8.33% 3	41.67% 15	33.33% 12	36	2.17
Affordable rental housing	72.22% 26	13.89% 5	5.56% 2	5.56% 2	2.78% 1	36	4.47
Capacity building supports for shelter, services, and/or housing providers	2.78% 1	25.00% 9	8.33% 3	30.56% 11	33.33% 12	36	2.33

Q8 For individuals experiencing homelessness, which of the following HOME-ARP supportive services are needed the most?*Note: Check all that apply. Selections will be ranked in next question. If you do not know which services this population needs, please select "None of the above/I don't know."*

Answered: 36 Skipped: 0

Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey



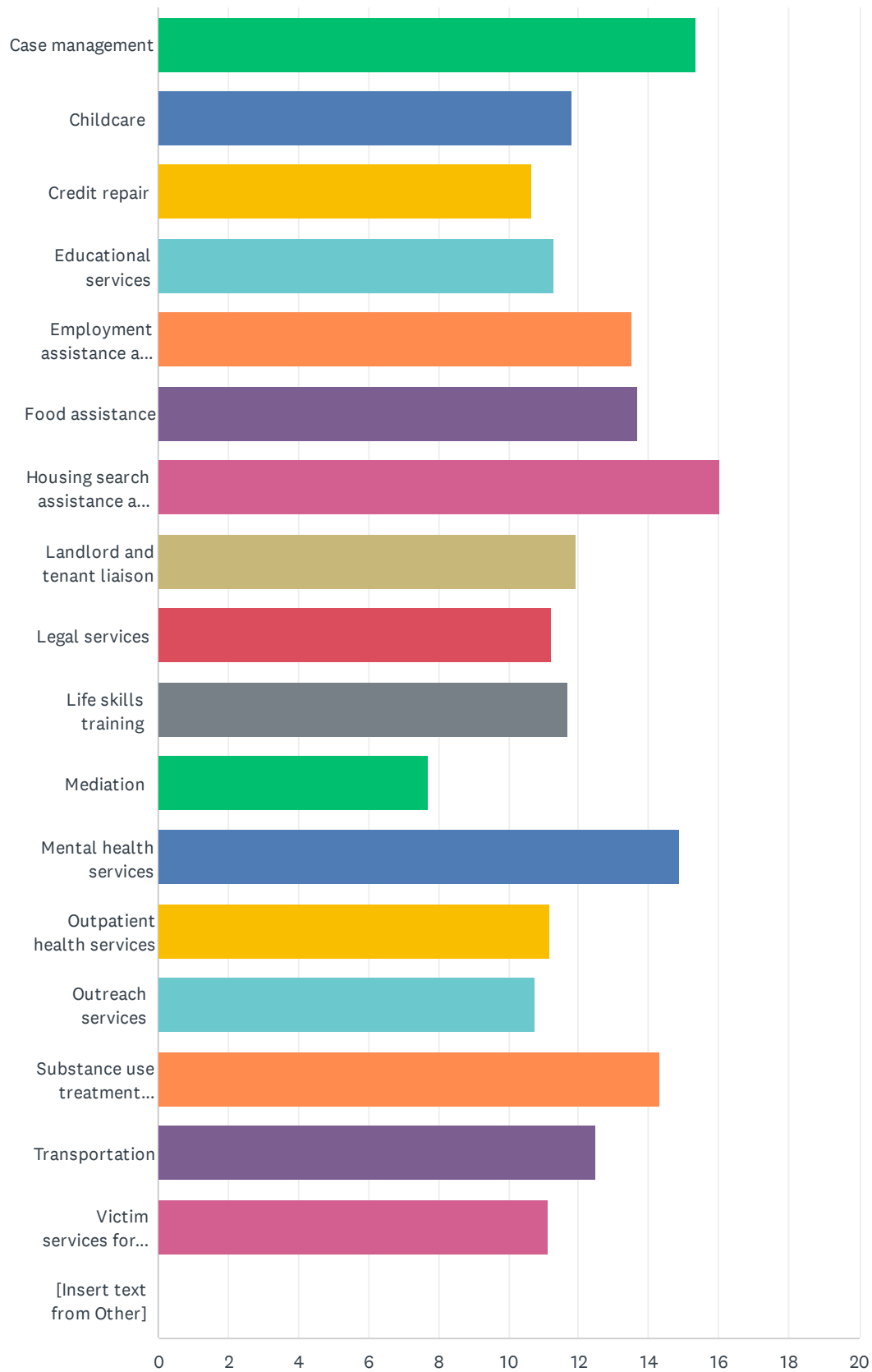
Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey

ANSWER CHOICES	RESPONSES	
None of the above/I don't know	5.56%	2
Case management	75.00%	27
Childcare	41.67%	15
Credit repair	19.44%	7
Educational services	36.11%	13
Employment assistance and job training	66.67%	24
Food assistance	50.00%	18
Housing search assistance and counseling	66.67%	24
Landlord and tenant liaison	44.44%	16
Legal services	38.89%	14
Life skills training	61.11%	22
Mediation	19.44%	7
Mental health services	77.78%	28
Outpatient health services	47.22%	17
Outreach services	44.44%	16
Substance use treatment services	66.67%	24
Transportation	66.67%	24
Victim services for persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	41.67%	15
Other (please specify)	0.00%	0
Total Respondents: 36		

Q9 Based on the supportive services selected, how would you rank the need for these services for individuals experiencing homelessness?

Answered: 33 Skipped: 3

Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey



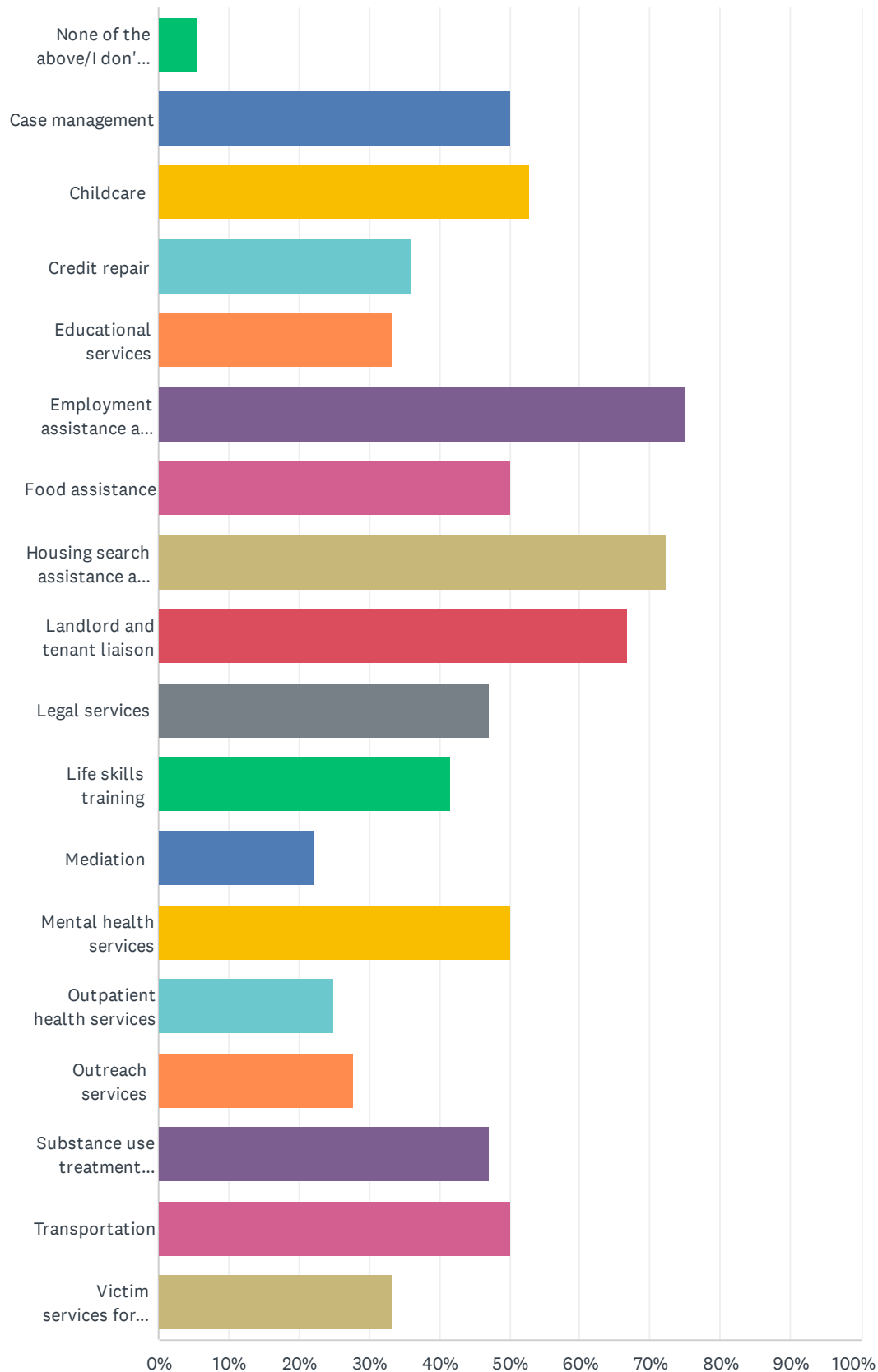
Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey

	1	2	3	4	5	6	7	8	9	10	11
Case management	34.62% 9	19.23% 5	0.00% 0	19.23% 5	3.85% 1	3.85% 1	3.85% 1	7.69% 2	0.00% 0	0.00% 0	7.69
Childcare	6.67% 1	0.00% 0	13.33% 2	6.67% 1	13.33% 2	6.67% 1	6.67% 1	6.67% 1	6.67% 1	6.67% 1	13.33
Credit repair	0.00% 0	0.00% 0	16.67% 1	0.00% 0	16.67% 1	0.00% 0	0.00% 0	16.67% 1	0.00% 0	16.67% 1	0.00
Educational services	0.00% 0	7.69% 1	0.00% 0	7.69% 1	7.69% 1	23.08% 3	15.38% 2	0.00% 0	7.69% 1	7.69% 1	15.38
Employment assistance and job training	4.17% 1	4.17% 1	25.00% 6	8.33% 2	16.67% 4	4.17% 1	20.83% 5	4.17% 1	0.00% 0	4.17% 1	4.17
Food assistance	5.56% 1	33.33% 6	11.11% 2	0.00% 0	5.56% 1	11.11% 2	11.11% 2	5.56% 1	0.00% 0	0.00% 0	5.56
Housing search assistance and counseling	41.67% 10	8.33% 2	20.83% 5	4.17% 1	12.50% 3	0.00% 0	4.17% 1	8.33% 2	0.00% 0	0.00% 0	0.00
Landlord and tenant liaison	6.25% 1	6.25% 1	6.25% 1	6.25% 1	12.50% 2	0.00% 0	18.75% 3	6.25% 1	12.50% 2	12.50% 2	0.00
Legal services	7.69% 1	7.69% 1	0.00% 0	0.00% 0	7.69% 1	7.69% 1	0.00% 0	7.69% 1	38.46% 5	7.69% 1	0.00
Life skills training	4.55% 1	9.09% 2	0.00% 0	9.09% 2	9.09% 2	13.64% 3	4.55% 1	13.64% 3	9.09% 2	9.09% 2	4.55
Mediation	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	28.57% 2	0.00% 0	14.29% 1	28.57
Mental health services	11.11% 3	18.52% 5	18.52% 5	11.11% 3	11.11% 3	18.52% 5	3.70% 1	0.00% 0	3.70% 1	3.70% 1	0.00
Outpatient health services	5.88% 1	0.00% 0	11.76% 2	11.76% 2	0.00% 0	11.76% 2	5.88% 1	5.88% 1	11.76% 2	11.76% 2	0.00
Outreach services	6.25% 1	12.50% 2	6.25% 1	6.25% 1	6.25% 1	6.25% 1	0.00% 0	0.00% 0	12.50% 2	12.50% 2	0.00
Substance use treatment services	12.50% 3	12.50% 3	8.33% 2	20.83% 5	12.50% 3	12.50% 3	8.33% 2	4.17% 1	0.00% 0	0.00% 0	8.33
Transportation	0.00% 0	8.33% 2	20.83% 5	12.50% 3	4.17% 1	4.17% 1	20.83% 5	4.17% 1	4.17% 1	8.33% 2	0.00
Victim services for persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	0.00% 0	7.14% 1	0.00% 0	14.29% 2	14.29% 2	14.29% 2	0.00% 0	14.29% 2	7.14% 1	0.00% 0	7.14
[Insert text from Other]	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00

Q10 For individuals at risk of homelessness, which of the following HOME-ARP supportive services are needed the most?*Note: Check all that apply. Selections will be ranked in next question. If you do not know which services this population needs, please select "None of the above/I don't know."*

Answered: 36 Skipped: 0

Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey



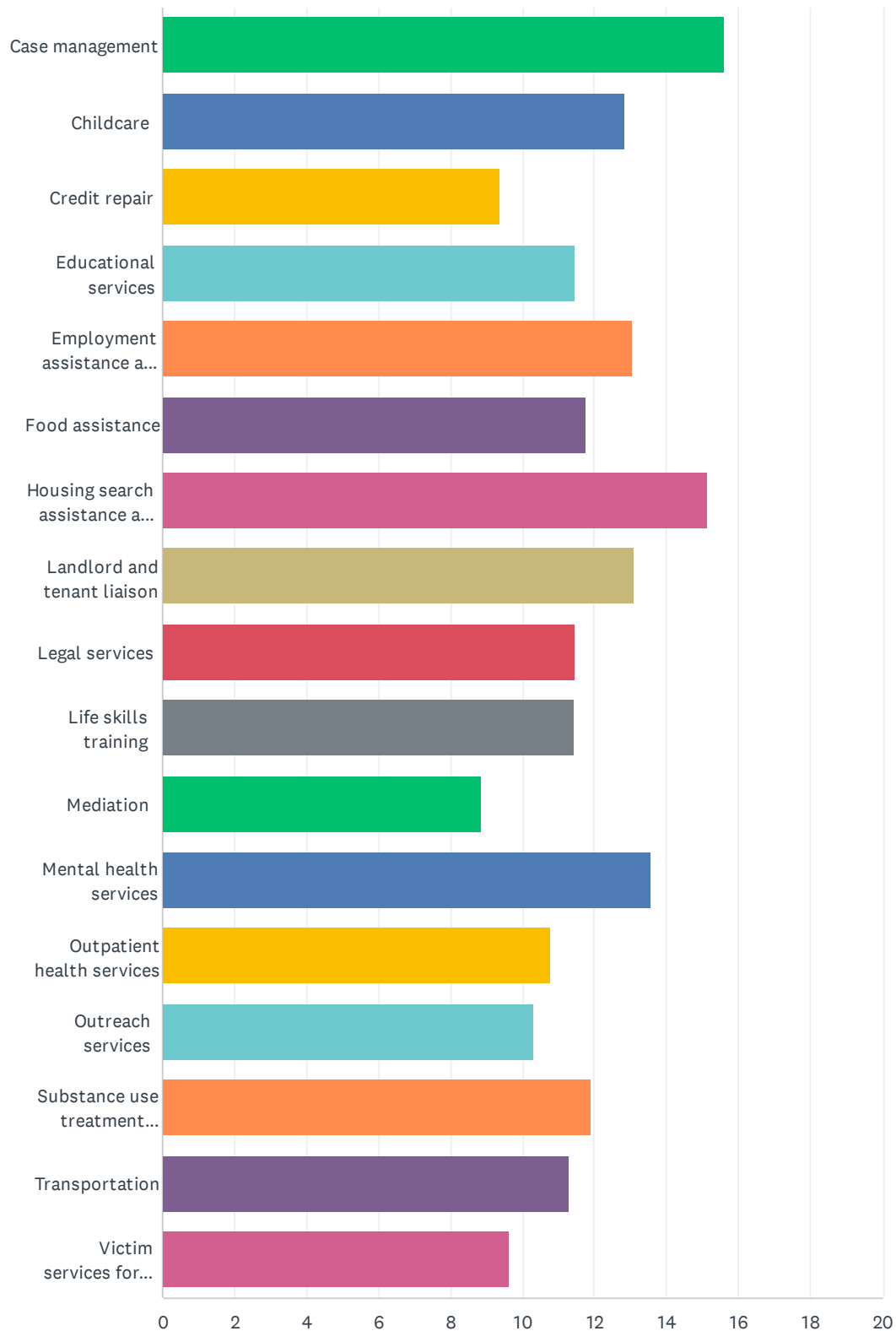
Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey

ANSWER CHOICES	RESPONSES	
None of the above/I don't know	5.56%	2
Case management	50.00%	18
Childcare	52.78%	19
Credit repair	36.11%	13
Educational services	33.33%	12
Employment assistance and job training	75.00%	27
Food assistance	50.00%	18
Housing search assistance and counseling	72.22%	26
Landlord and tenant liaison	66.67%	24
Legal services	47.22%	17
Life skills training	41.67%	15
Mediation	22.22%	8
Mental health services	50.00%	18
Outpatient health services	25.00%	9
Outreach services	27.78%	10
Substance use treatment services	47.22%	17
Transportation	50.00%	18
Victim services for persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	33.33%	12
Total Respondents: 36		

Q11 Based on the supportive services selected, how would you rank the need for these services for individuals at risk of homelessness?

Answered: 33 Skipped: 3

Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey



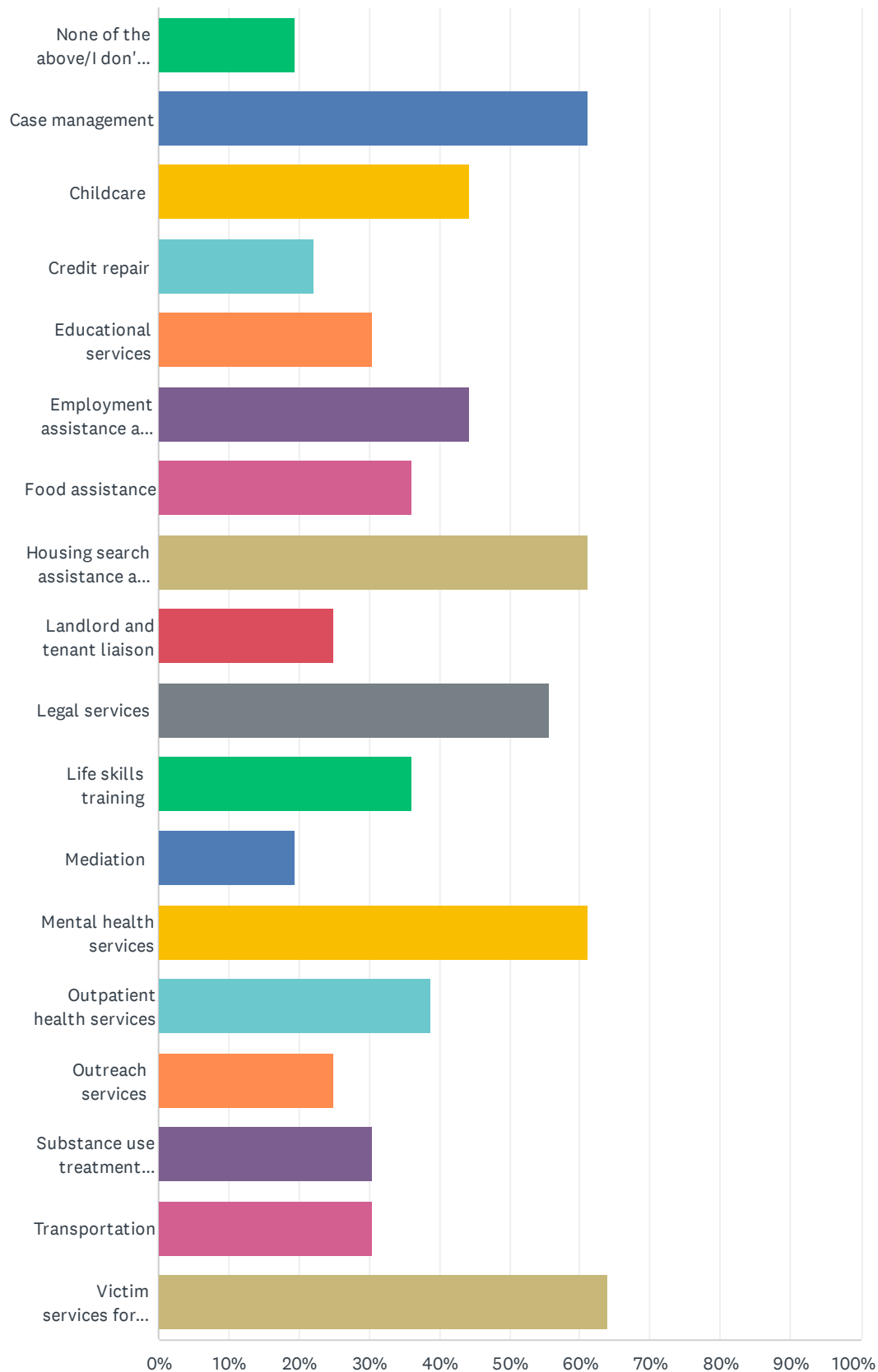
Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey

	1	2	3	4	5	6	7	8	9	10	11
Case management	55.56% 10	5.56% 1	11.11% 2	11.11% 2	5.56% 1	11.11% 2	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00
Childcare	0.00% 0	5.88% 1	17.65% 3	35.29% 6	11.76% 2	17.65% 3	0.00% 0	0.00% 0	0.00% 0	0.00% 0	5.88
Credit repair	0.00% 0	7.69% 1	0.00% 0	7.69% 1	23.08% 3	7.69% 1	0.00% 0	0.00% 0	7.69% 1	0.00% 0	15.38
Educational services	18.18% 2	9.09% 1	0.00% 0	9.09% 1	0.00% 0	9.09% 1	9.09% 1	0.00% 0	27.27% 3	0.00% 0	9.09
Employment assistance and job training	3.70% 1	22.22% 6	11.11% 3	14.81% 4	14.81% 4	7.41% 2	7.41% 2	7.41% 2	3.70% 1	0.00% 0	3.70
Food assistance	5.56% 1	27.78% 5	11.11% 2	0.00% 0	5.56% 1	5.56% 1	5.56% 1	5.56% 1	11.11% 2	0.00% 0	0.00
Housing search assistance and counseling	40.00% 10	8.00% 2	20.00% 5	16.00% 4	8.00% 2	0.00% 0	4.00% 1	0.00% 0	0.00% 0	4.00% 1	0.00
Landlord and tenant liaison	17.39% 4	26.09% 6	0.00% 0	8.70% 2	13.04% 3	8.70% 2	4.35% 1	4.35% 1	4.35% 1	4.35% 1	0.00
Legal services	0.00% 0	5.88% 1	29.41% 5	5.88% 1	11.76% 2	5.88% 1	5.88% 1	11.76% 2	0.00% 0	5.88% 1	5.88
Life skills training	7.14% 1	7.14% 1	7.14% 1	0.00% 0	14.29% 2	7.14% 1	21.43% 3	14.29% 2	0.00% 0	7.14% 1	7.14
Mediation	0.00% 0	0.00% 0	0.00% 0	12.50% 1	12.50% 1	12.50% 1	12.50% 1	0.00% 0	12.50% 1	0.00% 0	12.50
Mental health services	0.00% 0	27.78% 5	11.11% 2	16.67% 3	5.56% 1	22.22% 4	11.11% 2	0.00% 0	5.56% 1	0.00% 0	0.00
Outpatient health services	0.00% 0	0.00% 0	33.33% 3	0.00% 0	0.00% 0	11.11% 1	0.00% 0	11.11% 1	11.11% 1	22.22% 2	0.00
Outreach services	11.11% 1	11.11% 1	0.00% 0	0.00% 0	0.00% 0	11.11% 1	0.00% 0	22.22% 2	22.22% 2	11.11% 1	0.00
Substance use treatment services	17.65% 3	5.88% 1	0.00% 0	11.76% 2	5.88% 1	11.76% 2	17.65% 3	5.88% 1	5.88% 1	5.88% 1	5.88
Transportation	0.00% 0	0.00% 0	22.22% 4	16.67% 3	5.56% 1	0.00% 0	11.11% 2	16.67% 3	5.56% 1	16.67% 3	0.00
Victim services for persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	0.00% 0	0.00% 0	9.09% 1	0.00% 0	18.18% 2	0.00% 0	18.18% 2	18.18% 2	9.09% 1	9.09% 1	0.00

Q12 For persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, which of the following HOME-ARP supportive services are needed the most?*Note: Check all that apply. Selections will be ranked in next question. If you do not know which services this population needs, please select "None of the above/I don't know."*

Answered: 36 Skipped: 0

Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey



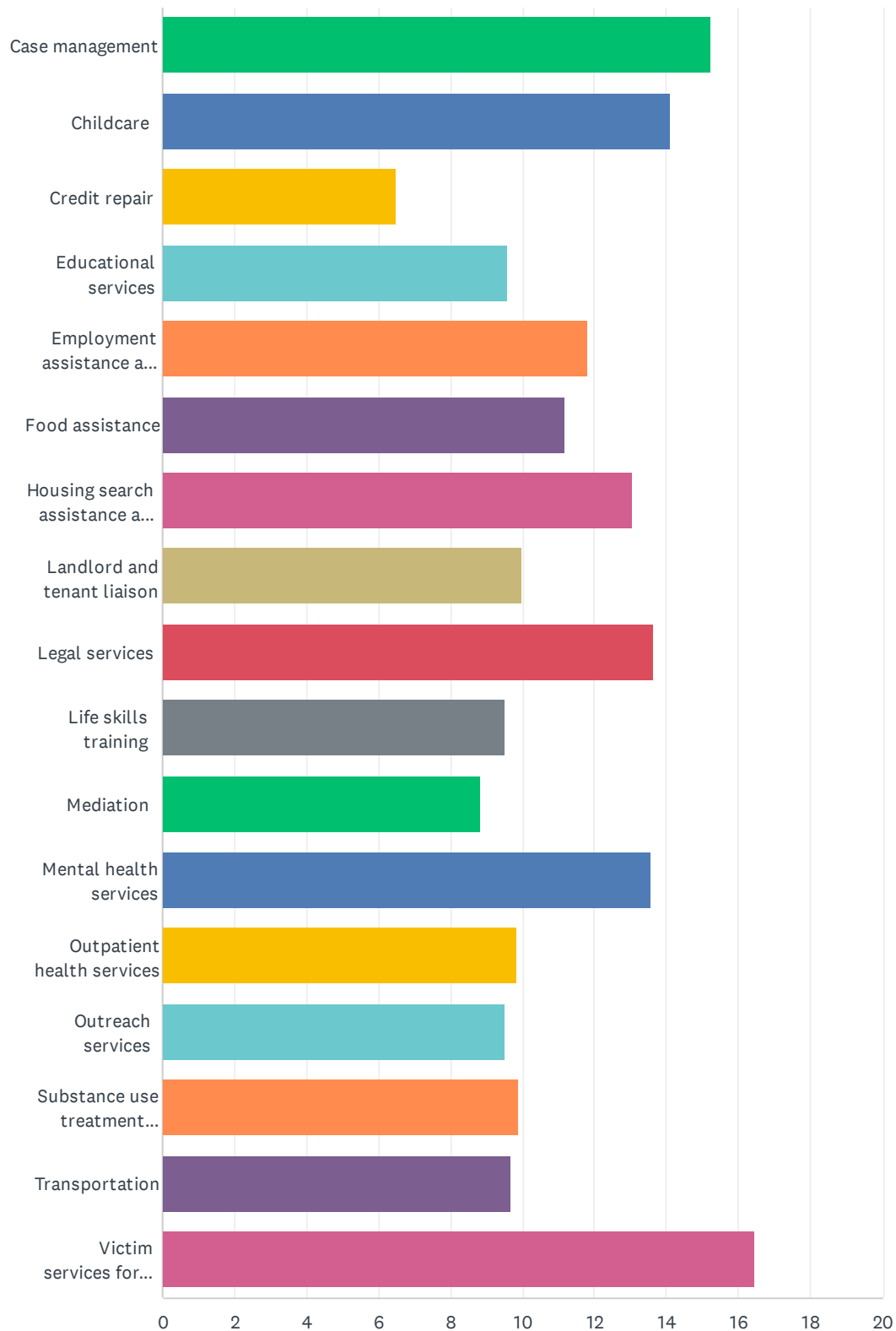
Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey

ANSWER CHOICES	RESPONSES	
None of the above/I don't know	19.44%	7
Case management	61.11%	22
Childcare	44.44%	16
Credit repair	22.22%	8
Educational services	30.56%	11
Employment assistance and job training	44.44%	16
Food assistance	36.11%	13
Housing search assistance and counseling	61.11%	22
Landlord and tenant liaison	25.00%	9
Legal services	55.56%	20
Life skills training	36.11%	13
Mediation	19.44%	7
Mental health services	61.11%	22
Outpatient health services	38.89%	14
Outreach services	25.00%	9
Substance use treatment services	30.56%	11
Transportation	30.56%	11
Victim services for persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	63.89%	23
Total Respondents: 36		

Q13 Based on the supportive services selected, how would you rank the need for these services for persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking?

Answered: 27 Skipped: 9

Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey



Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey

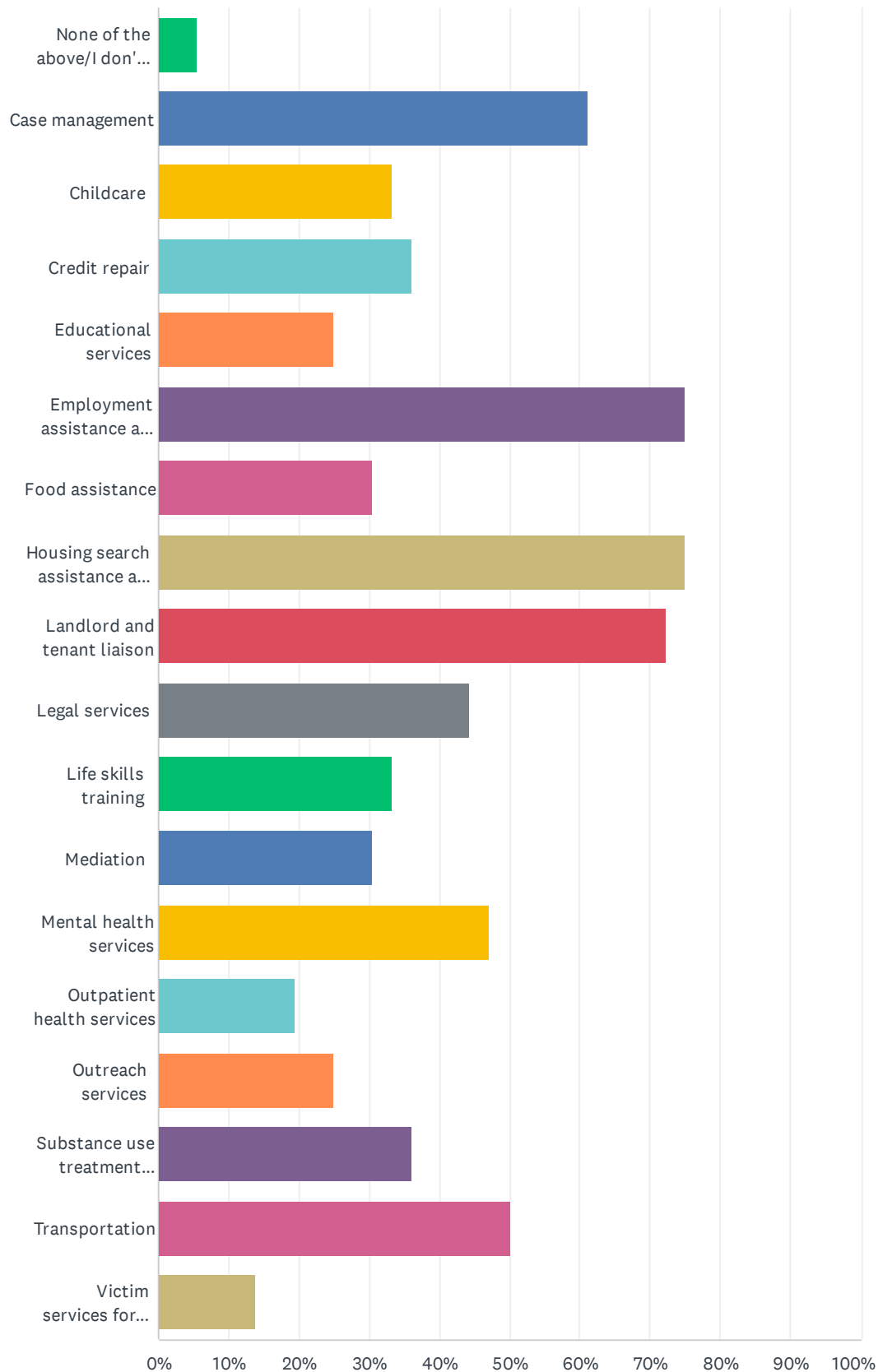
	1	2	3	4	5	6	7	8	9	10	11
Case management	23.81% 5	23.81% 5	28.57% 6	14.29% 3	4.76% 1	0.00% 0	0.00% 0	4.76% 1	0.00% 0	0.00% 0	0.00
Childcare	13.33% 2	26.67% 4	13.33% 2	26.67% 4	0.00% 0	0.00% 0	13.33% 2	0.00% 0	0.00% 0	0.00% 0	0.00
Credit repair	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	16.67% 1	0.00% 0	16.67% 1	0.00
Educational services	0.00% 0	10.00% 1	0.00% 0	0.00% 0	20.00% 2	0.00% 0	10.00% 1	10.00% 1	0.00% 0	20.00% 2	20.00
Employment assistance and job training	6.67% 1	0.00% 0	6.67% 1	6.67% 1	20.00% 3	26.67% 4	0.00% 0	6.67% 1	20.00% 3	0.00% 0	6.67
Food assistance	0.00% 0	18.18% 2	9.09% 1	0.00% 0	18.18% 2	9.09% 1	9.09% 1	0.00% 0	0.00% 0	18.18% 2	0.00
Housing search assistance and counseling	0.00% 0	10.00% 2	10.00% 2	25.00% 5	15.00% 3	15.00% 3	20.00% 4	5.00% 1	0.00% 0	0.00% 0	0.00
Landlord and tenant liaison	0.00% 0	0.00% 0	12.50% 1	12.50% 1	12.50% 1	0.00% 0	12.50% 1	12.50% 1	0.00% 0	12.50% 1	0.00
Legal services	5.26% 1	21.05% 4	31.58% 6	10.53% 2	5.26% 1	5.26% 1	5.26% 1	5.26% 1	5.26% 1	0.00% 0	0.00
Life skills training	0.00% 0	0.00% 0	0.00% 0	8.33% 1	16.67% 2	8.33% 1	0.00% 0	25.00% 3	8.33% 1	0.00% 0	16.67
Mediation	0.00% 0	0.00% 0	0.00% 0	16.67% 1	16.67% 1	0.00% 0	16.67% 1	0.00% 0	16.67% 1	0.00% 0	0.00
Mental health services	14.29% 3	14.29% 3	9.52% 2	14.29% 3	19.05% 4	14.29% 3	0.00% 0	0.00% 0	9.52% 2	4.76% 1	0.00
Outpatient health services	0.00% 0	8.33% 1	8.33% 1	16.67% 2	0.00% 0	8.33% 1	0.00% 0	8.33% 1	0.00% 0	8.33% 1	25.00
Outreach services	0.00% 0	0.00% 0	16.67% 1	16.67% 1	0.00% 0	0.00% 0	16.67% 1	16.67% 1	0.00% 0	0.00% 0	0.00
Substance use treatment services	0.00% 0	12.50% 1	12.50% 1	0.00% 0	0.00% 0	12.50% 1	12.50% 1	0.00% 0	12.50% 1	12.50% 1	0.00
Transportation	0.00% 0	11.11% 1	0.00% 0	0.00% 0	11.11% 1	11.11% 1	11.11% 1	22.22% 2	11.11% 1	0.00% 0	0.00
Victim services for persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	71.43% 15	14.29% 3	9.52% 2	0.00% 0	4.76% 1	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00

Q14 For others at greatest risk of homelessness/housing instability, which of the following HOME-ARP supportive services are needed the most?

Note: Check all that apply. Selections will be ranked in next question. If you do not know which services this population needs, please select "None of the above/I don't know."

Answered: 36 Skipped: 0

Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey



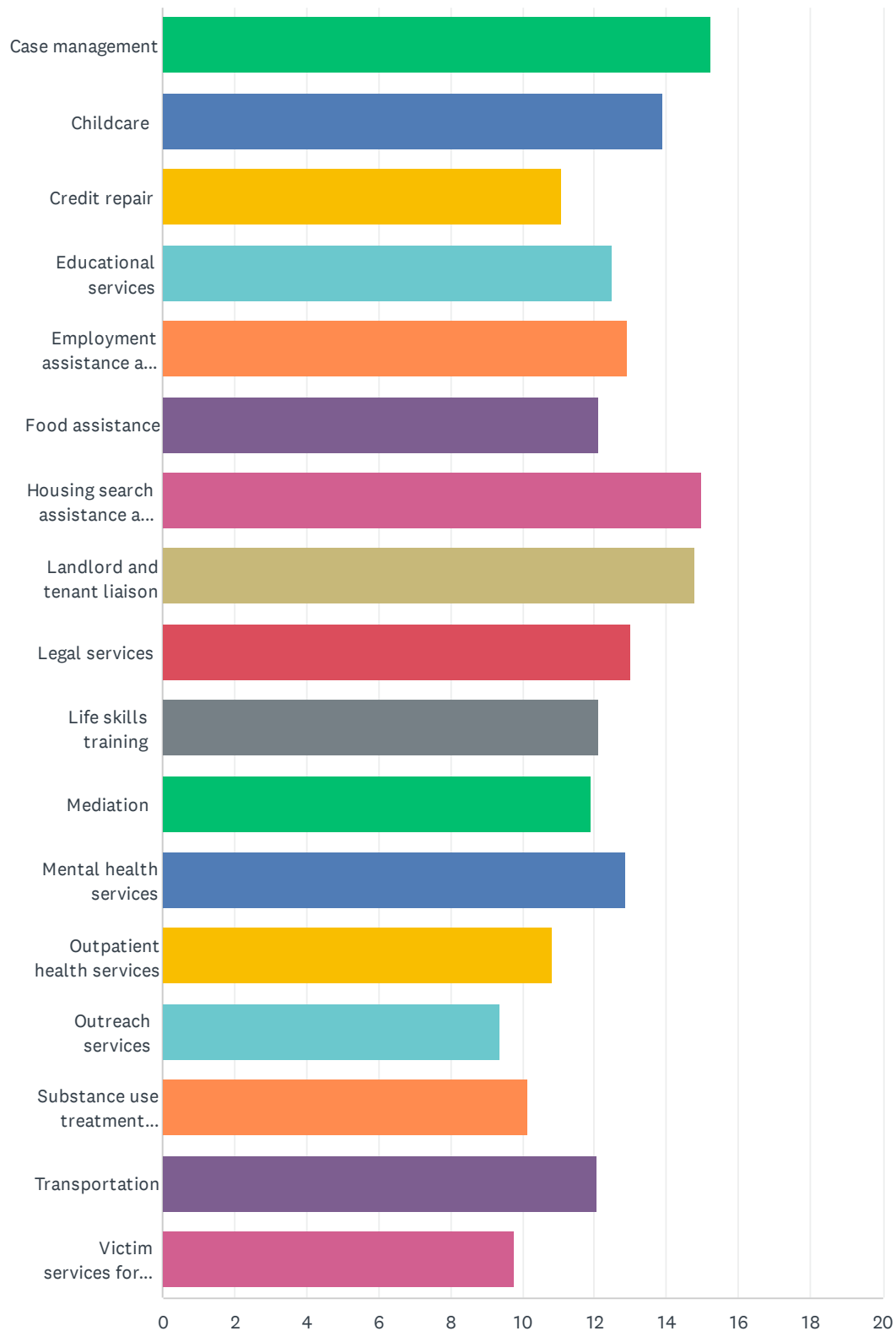
Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey

ANSWER CHOICES	RESPONSES	
None of the above/I don't know	5.56%	2
Case management	61.11%	22
Childcare	33.33%	12
Credit repair	36.11%	13
Educational services	25.00%	9
Employment assistance and job training	75.00%	27
Food assistance	30.56%	11
Housing search assistance and counseling	75.00%	27
Landlord and tenant liaison	72.22%	26
Legal services	44.44%	16
Life skills training	33.33%	12
Mediation	30.56%	11
Mental health services	47.22%	17
Outpatient health services	19.44%	7
Outreach services	25.00%	9
Substance use treatment services	36.11%	13
Transportation	50.00%	18
Victim services for persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	13.89%	5
Total Respondents: 36		

Q15 Based on the supportive services selected, how would you rank the need for these services for others at greatest risk of homelessness/housing instability?

Answered: 32 Skipped: 4

Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey



Turlock & Stanislaus County HOME Consortium HOME-ARP Stakeholder Survey

	1	2	3	4	5	6	7	8	9	10	11
Case management	61.90% 13	4.76% 1	14.29% 3	4.76% 1	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00% 0	14.29% 3	0.00
Childcare	0.00% 0	40.00% 4	20.00% 2	10.00% 1	0.00% 0	10.00% 1	0.00% 0	10.00% 1	10.00% 1	0.00% 0	0.00
Credit repair	0.00% 0	0.00% 0	8.33% 1	0.00% 0	33.33% 4	8.33% 1	8.33% 1	8.33% 1	16.67% 2	8.33% 1	8.33
Educational services	0.00% 0	12.50% 1	12.50% 1	12.50% 1	0.00% 0	25.00% 2	12.50% 1	25.00% 2	0.00% 0	0.00% 0	0.00
Employment assistance and job training	12.00% 3	12.00% 3	12.00% 3	12.00% 3	8.00% 2	16.00% 4	4.00% 1	8.00% 2	8.00% 2	0.00% 0	8.00
Food assistance	0.00% 0	10.00% 1	40.00% 4	10.00% 1	0.00% 0	0.00% 0	0.00% 0	0.00% 0	10.00% 1	20.00% 2	0.00
Housing search assistance and counseling	23.08% 6	26.92% 7	3.85% 1	34.62% 9	3.85% 1	3.85% 1	0.00% 0	0.00% 0	3.85% 1	0.00% 0	0.00
Landlord and tenant liaison	36.00% 9	16.00% 4	16.00% 4	0.00% 0	16.00% 4	8.00% 2	4.00% 1	0.00% 0	0.00% 0	0.00% 0	0.00
Legal services	0.00% 0	26.67% 4	13.33% 2	13.33% 2	6.67% 1	0.00% 0	33.33% 5	0.00% 0	0.00% 0	0.00% 0	0.00
Life skills training	0.00% 0	0.00% 0	18.18% 2	18.18% 2	18.18% 2	9.09% 1	9.09% 1	9.09% 1	0.00% 0	18.18% 2	0.00
Mediation	0.00% 0	10.00% 1	20.00% 2	0.00% 0	30.00% 3	20.00% 2	0.00% 0	0.00% 0	0.00% 0	0.00% 0	0.00
Mental health services	0.00% 0	18.75% 3	0.00% 0	18.75% 3	18.75% 3	18.75% 3	12.50% 2	6.25% 1	6.25% 1	0.00% 0	0.00
Outpatient health services	0.00% 0	0.00% 0	0.00% 0	16.67% 1	16.67% 1	0.00% 0	16.67% 1	33.33% 2	0.00% 0	0.00% 0	16.67
Outreach services	0.00% 0	12.50% 1	0.00% 0	0.00% 0	0.00% 0	0.00% 0	25.00% 2	12.50% 1	25.00% 2	0.00% 0	0.00
Substance use treatment services	0.00% 0	0.00% 0	8.33% 1	8.33% 1	16.67% 2	16.67% 2	0.00% 0	16.67% 2	8.33% 1	0.00% 0	8.33
Transportation	5.88% 1	0.00% 0	11.76% 2	17.65% 3	11.76% 2	17.65% 3	11.76% 2	5.88% 1	5.88% 1	5.88% 1	0.00
Victim services for persons fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking	0.00% 0	0.00% 0	25.00% 1	0.00% 0	0.00% 0	0.00% 0	25.00% 1	0.00% 0	25.00% 1	0.00% 0	0.00

Summary Level: Prioritization of Supportive Services for Each QP

Supportive Services	Individuals Experiencing Homelessness	Individuals At Risk of Homelessness	Persons Fleeing/ Attempting to Flee	Other Populations At Greatest Risk
Case Management	16.89	16.15	15.38	18.38
Childcare	14.63	14.22	13.60	14.40
Credit Repair	12.38	12.67	10.00	12.17
Educational Services	9.83	11.17	9.33	15.67
Employment Assistance and Job Training	13.67	15.09	13.75	15.00
Food Assistance	14.85	13.22	12.00	15.43
Housing Search Assistance and Counseling	15.93	16.20	13.88	14.57
Landlord and Tenant Liaison	13.42	14.07	10.33	11.17
Legal Services	11.25	13.29	13.00	13.60
Life Skills Training	13.29	12.25	9.40	9.50
Mediation	5.00	9.33	6.00	7.67
Mental Health Services	16.36	14.09	12.50	13.83
One-Time Financial Assistance	16.63	17.53	15.43	16.56
Outpatient Health Services	11.63	8.50	5.67	4.00
Outreach Services	14.38	10.40	4.33	14.75
Short- and Medium-Term Rental Assistance	15.00	15.93	14.50	15.40
Substance Use Treatment Services	13.33	12.00	4.50	3.00
Transportation	12.10	10.00	12.40	13.80
Victims Services for People Fleeing/Attempting to Flee	14.75	13.50	19.00	10.00

Public Participation Supporting Documentation

This section of the plan includes:

- Public Comment Period Comments/Questions
- Public Hearing Comments/Questions
- Press Release for HOME-ARP Allocation Plan
- Affidavit of Publication of Public Notice
- Copies of the Public Notice (English and Spanish)
- SF-424, SF-424B, SF-424D
- HOME-ARP Certifications

HOME-ARP Public Comments Received During the Public Comment Period

During the public comment period for the HOME-ARP Allocation Plan, the Consortium received four public comments/questions which are summarized below. All public comments/questions were accepted and considered.

#	Date Comment Received	Comment/Question	PJ Response
1.	3/02/2023	Please check the data on City/Consortium resources on page 67 of the plan.	The information in the table was corrected in the final version of the plan.
2.	3/07/2023	Blighted properties in Turlock (e.g., on Lander Avenue near Highway 165) are what people see when visiting the City. It's embarrassing. Housing First programs and gated tiny home communities can be successful models to help people experiencing homelessness. Is there land in Stanislaus Urban County or Turlock for tiny gated home communities? Businesses and individuals could potentially offer matching funds to assist with operating costs. I agree with using some of the funds to prevent people from becoming unsheltered in the first place. Please ensure there are good measurements for outcomes for programs using this funding. Many previous programs to help unsheltered people have lacked good outcome measurement.	These comments were accepted and will be considered during implementation planning.
3.	3/13/2023	The \$5M for the homeless should be used to get people off the streets and into temporary shelters. There are not enough shelters for disabled and mentally ill people. There are plenty of abandoned warehouses downtown along the tracks and money should go to purchase those warehouses. The second priority should be tiny homes. San Jose has had success in setting up tiny homes on unused land in the city's inventory. Women shelters can be single family homes and rental assistance can support families with children that are in need.	These comments were accepted and will be considered during implementation planning.
4.	3/13/2023	1.) The fundamental goal of these monies should be to help as many people as possible and that this is not what is being done or being proposed. 2.) I feel the approach that has been used for years is fundamentally flawed. We spend millions of dollars to purchase and rehab homes and then give them to nonprofits to be used for Transitional Housing. This reduces the stock of affordable housing which is not good. The City should be taking steps to increase the stock of lower cost housing.	These comments were accepted and will be considered during implementation planning.

		<p>3.) City staff have not provided information on transitional housing and related audits. I don't think we should spend any more money until we have greater transparency on spent funds.</p> <p>4.) We should spend funds on helping people on "the edge" of losing their housing with their rent, housing, and/or utilities. This aligns with what I have heard in the community and what is included in the Allocation Plan.</p> <p>5.) The Allocation Plan says that the Consortium is putting 15% of the allocation towards administration and planning. I do not agree with this. The County will be overseeing the funds and have the capacity to do so.</p> <p>6.) I don't think the Consortium should allocate funding to nonprofit capacity building. Why would nonprofits coordinate? How will this funding address the issue of limited nonprofit capacity?</p> <p>7.) We should investigate buying properties and installing modular housing. There are plenty of empty lots around town that could be used.</p> <p>8.) The Council should consider working with Self-Help Enterprises and seeing how they can help the community.</p> <p>9.) I don't understand what the money allocated for nonprofit operating costs will be used for.</p>	
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HOME-ARP Public Comments/Questions Received During the Public Hearing

The Consortium received nine public comments/questions during the public hearing on March 14, 2023, and are summarized below. All comments/questions were accepted and considered.

#	Date Comment Received	Public Comment/Question	Consortium Response
1.	3/14/2023	Why is tenant-based rental assistance budgeted at zero?	HOME-ARP tenant-based assistance (TBRA) tends to provide longer terms of assistance of up to three years. Usually, communities have vouchers. What we have heard from stakeholders and providers in the community is that clients with vouchers are struggling to find units they can afford even with a rental voucher. There is need for assistance with rent and services, but a higher need for affordable housing units which is why the Consortium prioritized affordable housing more than TBRA. We also heard that supportive services are needed along with housing for those who are experiencing homelessness/trauma/at risk of becoming homeless. Supportive services can be used for a smaller amount of funds and can help more people.
2.	3/14/2023	What is the occupancy rate of rental units today? It sounds like there are two big problems: Not enough housing and too many people in need.	Supply of housing is a concern. The occupancy rate of rental units in Turlock right now is .257%. There are 30 available rental units including apartments on the rental market right now. And there are 78 homeowner units available for sale as of yesterday. If you limit for sale units that are available and under \$500,000, there are 59 units available.
3.	3/14/2023	Are you confident on page 23 of report, do you feel accurate on your number's ad percentages of male/female. Numbers don't seem to match up.	We will review the table and address any corrections as needed in the final version of the plan.
4.	3/14/2023	Do we have a development plan for funding for the \$3.5M?	The HOME-ARP Allocation Plan does not include project-specific information but rather allocates funding across the eligible HOME-ARP activities. Implementation planning will start once the Allocation Plan has been approved by HUD. Turlock and Stanislaus Urban County will discuss what implementation will look like across the

#	Date Comment Received	Public Comment/Question	Consortium Response
			County. For example, Oakdale may have pending projects. We will talk with partners in the Consortium to see how funding will be spent across multiple jurisdictions. We'd like to see housing created not just changed from homeowners to renters. We understand that the housing market is very tight and aim to help as many people as we can. We'd like to help seniors with rent and utilities.
5.	3/14/2023	Once the plan is approved can we change it (funding)?	Yes, we can initiate a substantial amendment to make changes to the allocation amounts and activities.
6.	3/14/2023	If we did tenant-based rental assistance (TBRA), would we have to do a voucher system? Can we assist with TID, PG&E, and utility bills be eligible expenses?	Typically, we would use an outside agency for processing. Under HOME-ARP, supportive services can provide some assistance with rent and utilities. There are about twenty categories of allowable costs under supportive services. One of the categories is for short- to medium-term financial assistance that includes rental application fees, security deposits, utility deposits, utility payments, moving costs, first and last month rents, and payments of rental arrears. For short- to medium-term rental assistance, this would be assistance with rent for about 3 months (short-term) and 3-24 months (medium-term).
7.	3/14/2023	Regarding the We Care Center, a nonprofit would need \$200,00 or more to get a daycare center going. Not sure if these funds could provide for/support a daycare center and how long would it take to get the funds. If we wanted to do something with the National Guard Armory and construct multifamily housing, would funds be available for that?	The potential funding for a daycare center would not be this HOME-ARP funding as it is eligible for this use. For HOME-ARP funding, we first need to submit the Allocation Plan and have it approved by HUD. Once approved, we'll move on to implementation planning and then begin soliciting for projects. It may take some time until funding is available for specific projects.
8.	3/14/2023	We'd like to help as many people as possible. Expenses are going up and looking for a place can be difficult/it can be hard to find anything. Any help we can give to people for utility bills and other	Answered in other responses.

#	Date Comment Received	Public Comment/Question	Consortium Response
		expenses to help keep them in their homes. Need to build more low-cost housing. We purchased a 4 plex but not added a room for someone to live in. My suggestion is we have plenty of empty lots and burnt-out buildings and tear them down and look into working with an affordable housing developer or modular housing to put down multiple modular housing units. To not refurbish things. To build more low-cost affordable housing units.	
9.	3/14/2023	How much money are we paying Cloudburst? Why hasn't council decided to personally lobby the State and federal elected officials to obtain more affordable housing funds? I met a homeless couple that was living in a car and had a real estate agency worked with a couple to get them into a duplex and it took six months. Why hasn't the city followed the lead of other cities large and small, and purchased a hotel and converted it into low-cost housing. Buy a hotel.	The consultation agreement with Cloudburst to prepare the HOME-ARP Allocation Plan was around \$48,000-\$49,000, but they will not utilize the entire allocation. We were targeting a different timeframe for completing the plan before HUD implemented a mandatory deadline of March 31, 2023, to submit the plan. The plan was not prepared by staff as the plan had specific requirements for stakeholder outreach and data analysis that would be difficult to do at the staff level. There was administrating funding to be able to pay for the consultant to preparation of the plan.



156 South Broadway
Turlock, California 95380
<https://www.cityofturlock.org>
209.668.5540

FOR IMMEDIATE RELEASE | 2.28.23

Contact: Stephanie McGann Jantzen
(916) 813-7833

**“CITY OF TURLOCK ASKS FOR PUBLIC INPUT ON
FEDERAL FUNDING FOR THE CITY OF TURLOCK/STANISLAUS URBAN
COUNTY HOME CONSORTIUM”**

(Turlock, CA) – The City of Turlock is preparing its plan for the use of the HOME American Rescue Plan (ARP) and is seeking input from the Turlock community.

The City of Turlock/Stanislaus Urban County HOME Consortium was awarded a federal grant of \$5.3 million dollars. This consortium was formed in 1999, comprised of the cities within Stanislaus County (with the exception of Modesto) as well as the county itself. The Stanislaus County Board of Supervisors and the Turlock City Council agreed to form the HOME Consortium. This resulting partnership qualifies as a “Participating Jurisdiction” (PJ) under the Federal Home Investment Partnerships Program (HOME) and allows for the entire consortium to apply for HOME State funds, instead of individual cities and the county competing against each other.

This funding was created to assist individuals or households who are experiencing homelessness, at risk of homelessness, and other vulnerable populations, by providing affordable housing, rental assistance, supportive services, and non-congregate shelter to reduce homelessness and increase housing stability.

There are specific, eligible activities for which this funding can be used through the U.S. Department of Housing and Urban Development (HUD), to address the needs of qualifying populations.

The city will make funds available for these efforts once the HOME-ARP Allocation Plan has been through public participation process, Council adoption, and HUD approves through an action plan, called "The Substantial Amendment of the Fiscal Year 2021-2022 Annual Action Plan.”

“Housing in Turlock is one of my top priorities as the Vice Mayor of Turlock,” said Council member Pam Franco. “I am committed to making sure that we have the best balance of housing

opportunities for everyone in Turlock to ensure we are a city where our community can raise a family, work, live, recreate and retire. This council wants to hear from as many people as possible, so that our decisions reflect the will of the public.”

The HOME-ARP Proposed Amendment will be available for public review, now through Monday, March 13th, 2023. The Amendment will be posted on the City of Turlock’s website at <https://www.cityofturlock.org> and click on “HOME-ARP Allocation Plan”.

Public Comment will be accepted via mail, drop off, or email HPS@turlock.ca.us. The city asks that “Public Comment” is in the subject line of electronic communication, and if mail, please address correspondence as: City of Turlock Housing Program Services Department, 156 South Broadway, Suite 140, Turlock, CA 95380.



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San Luis Obispo Tribune
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Wichita Eagle

AFFIDAVIT OF PUBLICATION

Account #	Order Number	Identification	Order PO	Amount	Cols	Depth
14864	384754	LEGAL NOTICE	4290 for HOME-ARP	\$650.00	3	20.50 in

Attention: Sherry Touitou
CITY OF TURLOCK HOUSING
156 S BROADWAY, SUITE 140
TURLOCK, CA 95380

Copy of ad content
is on the next page

Declaration of Publication C.C.P. S2015.5

STATE OF CALIFORNIA)
) ss.
County of Stanislaus)

I am a citizen of the United States; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer of the Modesto Bee, a newspaper of general circulation, printed and published in the city of Modesto, County of Stanislaus, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Stanislaus, State of California, under the date of February 25, 1951 Action No. 46453 that the notice, of which the annexed is a printed copy, has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

1 insertion(s) published on:

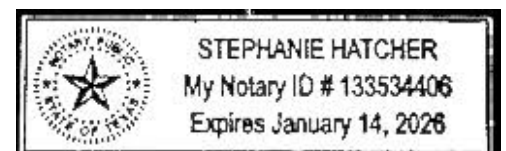
02/23/23

I certify (or declare) under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Dallas, Texas on:

Date: 8th, day of March, 2023

Stephanie Hatcher

Notary Public in and for the state of Texas, residing in Dallas County



Extra charge for lost or duplicate affidavits.
Legal document please do not destroy!

**NOTICE OF PUBLIC COMMENT PERIOD & PUBLIC HEARING****City of Turlock****Second Substantial Amendment to the FY 2021-2022****Annual Action Plan****City of Turlock/Stanislaus Urban County HOME Consortium****HOMES-ARP Allocation Plan**

Notice is hereby given to residents of the City of Turlock/Stanislaus Urban County HOME Consortium (Consortium) is preparing its plan for use of the HOME American Rescue Plan (ARP) Program funding. The Division is seeking input on the proposed use of funds. The draft Substantial Amendment to the FY 2021-2022 Annual Action Plan is now available for review and comment. The Consortium was awarded \$8,323,420 in HOME-American Rescue Plan (ARP) funds in a one-time allocation from HUD. Federal HOME-ARP funding was created to assist individuals or households who are experiencing homelessness, at risk of homelessness, and other vulnerable populations, by providing affordable housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability. The HOME-ARP Allocation Plan allocates the use of the HOME-ARP grant funds to address these needs with the HUD-approved eligible activities. The HOME-ARP Allocation plan describes how the Consortium intends to distribute HOME-ARP funds to address the needs of qualifying populations. The City will make funds available for activities once the HOME-ARP Allocation Plan's public participant process, Council adoption, and HUD approval have been completed through the Substantial Amendment of the FY 2021-2022 Annual Action Plan. The draft HOME-ARP Allocation Plan designates funds for the following activities.

The Proposed Amendment to the FY 2021-2022 Annual Action Plan for HOME-ARP Activities and Use of HOME-ARP funds

Activities	Allocation
Non-Profit Operating	\$ 100,000
Non-Profit Capacity Building	\$ 160,000
Development of Affordable Housing	\$ 3,624,807
Supportive Services	\$ 700,000
Administration & Planning	\$ 738,613
Total	\$ 5,323,420

The HOME-ARP Proposed Amendment will be available for a 10-day public review and comment period from Friday February 24, 2023 through and including Monday March 13, 2023. The Amendment will be posted on the City of Turlock's website at <https://cityofturlock.ca.us/housingcommunitydevelopment> to solicit residents and other interested parties an opportunity to provide input and comments on the proposed Amendment.

Public Comment will be accepted via mail, drop off, or email to: equity@cityofturlock.ca.us or HP@cityofturlock.ca.us (please add "Public Comment" in the subject line). If mailing or dropping off, please use: City of Turlock Housing Program services Department, 158 South Broadway, Suite 140, Turlock CA 95380.

NOTICE OF PUBLIC HEARING

Concurrently, notice is hereby given that Turlock City Council will host a Public Hearing on the HOME-ARP proposed amendment at the Tuesday, March 14, 2023, at 6:00 p.m. during the regular City Council meeting to further solicit public comments and to review and approve the submission of the draft Substantial Amendment to HUD. This meeting is open to the public. The event is in person at City Hall in the Yosemite Conference Room, 2nd floor at City Hall -158 South Broadway, Turlock CA 95380.

Public written comments or inquiries will be accepted via mail, drop off, or email no later than March 13, 2023 at 4:00 p.m. to: equity@cityofturlock.ca.us or HP@cityofturlock.ca.us or at (209) 686-6410 (please add "Public Comment" in the subject line). If mailing or dropping off, please use: City of Turlock Housing Program services Department, 158 South Broadway, Suite 140, Turlock CA 95380.

Please see the city website under "council meetings" for current information about meeting access to comply with national and local social gathering requirements and public participation or visit Turlock Administration at (209) 686-6640. Call Turlock Administration if you need ADA accommodation to participate in this public hearing.

**NOTICIA PÚBLICA****Ciudad de Turlock****Segunda Enmienda Substantial al Plan de Acción Anual****para el año fiscal 2021-2022 Consorcio HOME de la Ciudad****de Turlock / Consorcio Urbano de Stanislaus****Plan de Asignación HOME-ARP**

Por la presente, se notifica a los residentes de la Ciudad de Turlock/Condado Urbano de Stanislaus HOME Consorcio (Consortio) está preparando su plan para el uso de los fondos del programa HOME American Rescue Plan (ARP). La división está buscando la opinión sobre la propuesta de gasto de fondos. El borrador de Enmienda Substantial al Plan de Acción Anual para el año fiscal 2021-2022 está disponible para revisión y comentarios. El Consorcio fue otorgado \$8,323,420 en fondos HOME American Rescue Plan (ARP) en una asignación única por HUD. Los fondos federales HOME-ARP fueron creados para la ayuda a personas o familias quienes se encuentran sin hogar, o en riesgo de quedarse sin hogar, y otras poblaciones vulnerables, en proveer viviendas asequibles, asistencia de alquiler, servicio de apoyo y alberges no colectivo, para reducir la falta de vivienda y aumentar la estabilidad de vivienda. El plan de asignación de HOME-ARP designa el uso de los fondos otorgados HOME-ARP para abordar estas



NOTICE OF PUBLIC COMMENT PERIOD & PUBLIC HEARING

City of Turlock



Second Substantial Amendment to the FY 2021-2022 Annual Action Plan

City of Turlock/Stanslaus Urban County HOME Consortium

HOME-ARP Allocation Plan

Notice is hereby given to residents of the City of Turlock/Stanslaus Urban County HOME Consortium (Consortium) is preparing its plan for use of the HOME American Rescue Plan (ARP) Program finding. The Division is seeking input on the proposed use of funds. The draft Substantial Amendment to the FY 2021-2022 Annual Action Plan is now available for review and comment. The Consortium was awarded \$5,323,420 in HOME-American Rescue Plan (APR) funds in a one-time allocation from HUD. Federal HOME-ARP funding was created to assist individuals or households who are experiencing homelessness, at risk of homelessness, and other vulnerable populations, by providing affordable housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability. The HOME-ARP Allocation Plan allocates the use of the HOME-ARP grant funds to address these needs with the HUD-approved eligible activities. The HOME-ARP Allocation plan describes how the Consortium intends to distribute HOME-ARP funds to address the needs of qualifying populations. The City will make funds available for activities once the HOME-ARP Allocation Plan's public participant process, Council adoption, and HUD approval have been completed though the Substantial Amendment of the FY 2021-2022 Annual Action Plan. The draft HOME-ARP Allocation Plan designates funds for the following activities.

The Proposed Amendment to the FY 2021-2022 Annual Action Plan for HOME-ARP Activities and Use of HOME-ARP funds

Activities	Allocation
Non-Profit Operating	\$ 150,000
Non-Profit Capacity Building	\$ 150,000
Development of Affordable Housing	\$ 3,524,907
Supportive Services	\$ 700,000
Administration & Planning	\$ 798,513
Total	\$ 5,323,420

The HOME-ARP Proposed Amendment will be available for a 15-day public review and comment period from Friday February 24, 2023 through and including Monday March 13, 2023. The Amendment will be posted on the City of Turlock's website at <https://ci.turlock.ca.us/housingprograms/programplansreports/> to solicit residents and other interested parties an opportunity to provide input and comments on the proposed Amendment.

Public Comment will be accepted via mail, drop off, or email to: kquintero@turlock.ca.us or HPS@turlock.ca.us (please add "Public Comment" in the subject line). If mailing or dropping off,

please use: City of Turlock Housing Program services Department, 156 South Broadway, Suite 140, Turlock CA 95380.

NOTICE OF PUBLIC HEARING

Concurrently, notice is hereby given that Turlock City Council will host a Public Hearing on the HOME-ARP proposed amendment at the Tuesday, March 14, 2023, at 6:00 p.m. during the regular City Council meeting to further solicit public comments and to review and approve the submission of the draft Substantial Amendments to HUD. This meeting is open to the public. The event is in person at City Hall in the Yosemite Conference Room, 2nd floor at City Hall -156 South Broadway, Turlock CA 95380.

Public written comments or inquiries will be accepted via mail, drop off, or email no later than March 13, 2023 at 4:00 p.m. to: kquintero@turlock.ca.us or HPS@turlock.ca.us or at (209) 668-5610 (please add “Public Comment” in the subject line). If mailing or dropping off, please use: City of Turlock Housing Program services Department, 156 South Broadway, Suite 140, Turlock CA 95380.

Please see the city website under “council meetings” for current information about meeting access to comply with national and local social gathering requirements and public participation or call Turlock Administration at (209) 668-5540. Call Turlock Administration if you need ADA accommodation to participate in this public hearing.



NOTICIA PÚBLICA
Ciudad de Turlock



Segunda Enmienda Sustancial al Plan de Acción Anual para el año fiscal 2021-2022 Consorcio HOME de la Ciudad de Turlock / Condado Urbano de Stanislaus

Plan de Asignación HOME-ARP

Por la presente, se notifica a los residentes de la Ciudad de Turlock/Condado Urbano de Stanislaus HOME Consorcio (Consortio) está preparando su plan para el uso de los hallazgos del programa HOME American Recuse Plan (ARP). La división está buscando la opinión sobre la propuesta de huso de fondos. El borrador de Enmienda Sustancial al Plan de Acción Anual para el año fiscal 2021-2022 está disponible para revisión y comentarios. El Consorcio fue otorgado \$5,323,420 en fondos HOME American Recuse Plan (ARP) en una asignación única por HUD. Los fondos federales HOME-ARP fueron creados para la ayudar a personas o familias quienes se encuentran sin hogar, o en riegos de quedarse sin hogar, y otras poblaciones vulnerables, en proveer viviendas asequibles, asistencia de alquiler, servicio de apoyo y alberges no colectivo, para reducir la falta de vivienda y aumentar la estabilidad de vivienda. El plan de asignación de HOME-ARP asigna el uso de los fondos otorgados HOME-ARP para abordar estas necesidades con las actividades elegibles aprobadas por HUD. EL Plan de Asignación HOME-ARP describe como el Consorcio propone la distribución de fondos HOME-ARP para abordar las necesidades de las poblaciones elegibles. La ciudad pondrá a disposición fondos para actividades al ver cumplido con el proceso de consulta asociada del plan de asignación HOME-AR, proceso de participación pública, adopción por el consejo y la aprobación de HUD en la enmienda sustancial del Plan de Acción Anual del año fiscal 2021-2022. Borrador del Plan de Asignación HOME-ARP designa fondos para las siguientes actividades:

La enmienda propuesta al año fiscal FY 2021-2022 plan de acción anual para las actividades HOME-ARP y huso de fondos HOME-ARP

Actividades	Asignación
Operaciones sin fines de lucro	\$ 150,000
Creación de capacitación sin fines de lucro	\$ 150,000
Desarrollo de vivienda asequibles	\$ 3,524,907
Servicios de apoyo	\$ 700,000
Administración y planificación	\$ 798,513
Total	\$ 5,323,420

La enmienda propuesta de HOME-ARP estará disponible en periodo de revisión y comentario público durante 15 días desde el viernes 24 de febrero de 2023 hasta el lunes 13 de marzo de 2023. La enmienda se publicara en el sitio web de la ciudad de Turlock en

<https://ci.turlock.ca.us/housingprograms/programplansreports/> para solicitar a los residente y otros partes interesadas la oportunidad de aportar y comentar sobre la enmienda propuesta.

Comentario público será aceptado por vía correo, entrega en persona, o correo electrónico a: kquintero@turlock.ca.us o al HPS@turlock.ca.us (por favor agregue “Comentario Publico” en el área de asunto). Si envía por correo o entrega en persona utilice: City of Turlock Housing Program services Department, 156 South Broadway, Suite 140, Turlock CA 95380.

Participación de Ciudadanos

Al mismo tiempo, se da aviso que el Concejo Municipal de Turlock llevará a cabo una audiencia pública tocante la enmienda propuesta tocante HOME-ARP el miércoles, 14 de marzo del 2023 a las 6:00 pm durante la reunión regular del Concejo Municipal para solicitar comentarios de público y aprobar la s en 156 South Broadway, Yosemite Cuarto de Conferencia, Turlock, CA 95380 para solicitar más comentarios del público y revisar y aprobar la entrega del borrador de Enmiendas sustanciales a HUD. Esta reunión está disponible al público. La reunión es en persona en el ayuntamiento en la sala de conferencia Yosemite, segundo piso-156 S Broadway, Turlock, Ca 95380.

Se pueden enviar comentarios o consultas por escrito al Supervisor de Vivienda, por correo electrónico no más tardar el 13 de marzo de 2023 a las 4:00 p.m. a: kquintero@turlock.ca.us o HPS@turlock.ca.us o llamar al (209) 668-5610 (por favor agregue “Comentario Publico” en el área de asunto). Si envía por correo o entrega en persona utilice: City of Turlock Housing Program services Department, 156 South Broadway, Suite 140, Turlock CA 95380.

Consulte el sitio web de la Ciudad bajo “reuniones del consejo” para obtener información actualizada sobre el acceso a las reuniones para cumplir con los requisitos de reuniones sociales nacionales y locales y la participación pública o llame a la Administración de Turlock al (209) 668-5540. Llame a la Administración de Turlock si necesita adaptación de ADA para participar en la audiencia pública.

City ad# 4290 to run in Modesto Bee on Thursday 02/23/23

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

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

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

M21-DP060240

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:** City of Turlock

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

94-060000445

*** c. UEI:**

JDYXAB12QLG1

d. Address:

* Street1: 156 South Broadway, Suite 140

Street2:

* City: Turlock

County/Parish:

* State: CA: California

Province:

* Country: USA: UNITED STATES

* Zip / Postal Code: 95380-5435

e. Organizational Unit:

Department Name:

Development Services

Division Name:

Housing Program Services

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

Prefix: Mrs.

* First Name: Katie

Middle Name:

* Last Name: Quintero

Suffix:

Title: Development Services Director

Organizational Affiliation:

* Telephone Number: (209) 668-5542 ext. 2236

Fax Number: (209) 668-5120

* Email: kquintero@turlock.ca.us

Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

* 10. Name of Federal Agency:

U. S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME-American Rescue Plan (ARP)

* 12. Funding Opportunity Number:

14.239

* Title:

14.239 HOME Investment Partnerships Program- ARP

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

HOME American Rescue Plan (HOME-ARP)

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="5,323,420.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="5,323,420.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

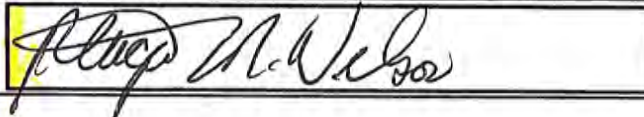
Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

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

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


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

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

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

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

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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	City Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Turlock	3/14/23

ASSURANCES - NON-CONSTRUCTION PROGRAMS

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

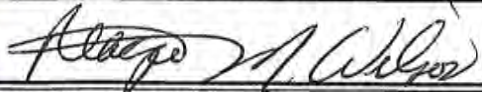
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE City Manager
APPLICANT ORGANIZATION City of Turlock	DATE SUBMITTED 3/14/23

HOME-ARP CERTIFICATIONS

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

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

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

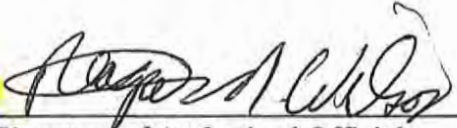
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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


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

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

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


Signature of Authorized Official


Date


Title