

## HOME-ARP Allocation Plan Template with Guidance

**Instructions:** All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

### Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

### Template:

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

The City of Hamilton consulted with multiple local agencies, citizens, and stakeholders in the City of Hamilton concerning the uses of the city’s HOME-ARP funds. The representatives from the below agencies attended the Public Meeting(s) offered via Zoom. The spreadsheet of the persons/organizations invited to the Public Meetings is below.

***List the organizations consulted:***

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
Serve City	Homeless Service Provider	Public Meeting - Zoom 3/24/22 & 3/25/22; Survey provided;	It was suggested that the city consider additional permanent supportive transitional housing, and also non-congregate housing.
Family Promise	Homeless Service Provider	Public Meeting - Zoom 3/24/22 & 3/25/22; Survey provided;	It was suggested that the city consider additional affordable housing options and also review current zoning laws that cause new construction and housing hurdles. Additionally, concerns regarding accessible and affordable transportation and fair housing were mentioned.
YWCA Hamilton	Domestic Violence Service Provider	Public Meeting - Zoom 3/24/22 & 3/25/22; Survey provided;	It was suggested that the city consider additional supportive and low-income housing.
Developmental Disabilities Board	Public Agency to Address the Needs of Persons with Disabilities	Public Meeting - Zoom 3/24/22 & 3/25/22; Survey provided;	No specific information was provided.
Community Health Alliance	Public Agency to Address the Needs of Persons with Disabilities	Public Meeting - Zoom; Survey provided;	Attended the meeting and provided feedback concerning persons at risk for homelessness and the need for low-income.
SELF	Public Agency to Address the Needs of the Qualifying Populations	Public Meeting - Zoom; Survey provided;	It was suggested that the city consider additional affordable housing options for local residents. Also, the need for rental assistance (due to COVID or poor rental history) was also mentioned.
Butler Metropolitan Housing Authority	Public Housing Authority	Invited to the Public Meetings; survey provided	No one from BMHA attended the meetings.
Neighborhood Housing Services	Public Agency that Addresses the Needs of the Qualifying Populations	Public Meeting - Zoom	It was suggested that additional housing for low-income residents be considered by the city.

Butler County Veterans Service Commission	Veterans' Group Public Agency to Address the Needs of the Qualifying Populations	Invited to the Public Meetings; survey provided.	No one from BCVSC attended the meetings or specific information provided.
Continuum of Care Members	CoC	Invited to the Public Meetings survey provided.	Members of the local CoC attended and provided feedback concerning housing for homeless persons.
Housing Opportunities Made Equal (HOME)	Fair Housing Advocates	Invited to the Public Meetings survey provided.	No one from HOME attended the meetings or specific information provided.
Community Development Professionals	CoC	Invited to the Public Meetings survey provided.	Provided comments concerning the need for additional affordable housing.
Partnerships for Housing	Public Agency to Address the Needs of Persons with Disabilities	Invited to the Public Meetings survey provided	No comments received.
Talbert House	Public Agency to Address the Needs of Persons with Disabilities	Invited to the Public Meetings survey provided	Attended the meeting and provided feedback concerning persons at risk for homelessness and the need for low-income.
United Way	Services for Veterans	Invited to the Public Meetings survey provided	No comments received.
Salvation Army	Supportive Services	Invited to the Public Meetings survey provided	No comments received.
Lifespan - Elderly Services	Public Agency to Address the Needs of Persons with Disabilities	Invited to the Public Meetings survey provided	No comments received.
HOPE House	Homeless Service Provider		Attended a meeting and provided feedback concerning the need for additional supportive and affordable housing. Additionally, a need for housing for larger families was expressed (3 bedrooms or more). Lastly, the need for broadened communication with landlords/property owners was expressed.

St. Julie's Catholic Church	Homeless Service Provider	Invited to the Public Meetings survey provided	No comments received.
Hamilton Living Water Ministry	Public Agency to Address the Needs of the Qualifying Populations	Invited to the Public Meetings survey provided	No comments received.
Butler Co. Educational Services	Public Agency to Address the Needs of Persons with Disabilities	Invited to the Public Meetings survey provided	Attended a meeting and provided feedback concerning the need for additional supportive affordable housing for larger families.
Dream Center	Homeless Service Provider	Invited to the Public Meetings survey provided	No comments received.
Sojourner Recovery	Public Agency to Address the Needs of Persons with Disabilities	Invited to the Public Meetings survey provided	No comments received.
Parachute	Public Agency to Address the Needs of the Qualifying Populations	Invited to the Public Meetings survey provided	No comments received.
Boys & Girls Club	Public Agency to Address the Needs of the Qualifying Populations	Invited to the Public Meetings survey provided	No comments received.
Great Miami Valley YMCA	Public Agency to Address the Needs of the Qualifying Populations		Attended a meeting and provided feedback concerning the need for additional affordable housing.
Women Helping Women	Domestic Violence Service Provider	Invited to the Public Meetings survey provided	No comments received.
HYPE	Public Agency to Address the Needs of the Qualifying Populations	Invited to the Public Meetings survey provided	No comments received.
Butler Co Homeless & Housing Coalition	CoC	Invited to the Public Meetings survey provided	Members of the BCHHC attended and provided feedback concerning homeless persons and their housing needs.

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

The city received multiple suggestions for additional supportive housing, low-income housing, and affordable market rate housing in and around the jurisdiction. It was also suggested that the city re-evaluate its current zoning laws as the current laws have presented issues for some of the local organizations and developers. It was suggested that the city consider serving as a liaison between local organizations and developers to facilitate partnerships to produce additional housing. (Specific comments per organization are listed above)

## **Public Participation**

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

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

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

### **Template:**

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

- ***Date(s) of public notice:*** Thursday, March 24, 2022 & Friday, March 25, 2022
- ***Public comment period:*** November 13, 2022 - December 12, 2022
- ***Date(s) of public hearing:*** January 25, 2023 & February 8, 2023

***Describe the public participation process:***

In the spring of 2022, the city held two public meetings. Invitations to the meetings were sent to CoC members, homeless service providers, domestic violence service providers, veterans' groups, local PHA, public agencies that address the needs of qualifying populations, and public or public organizations that address fair housing, civil rights, and address needs of persons with disabilities. During the meetings feedback was received verbally and via a survey connected to the presentation. The city also made public an online survey that was specific to the HOME-ARP plan. In the winter of 2022-2023, the city held two public hearings regarding the Substantial Amendment necessary to accept and appropriate the HOME-ARP funds. In preparation for the public hearings the city announced the dates, times, location, etc. The city made announcements via the Journal News and the city's social media outlets. During both public hearings no comments were received.

***Describe efforts to broaden public participation:***

The city released an online survey on March 2, 2022. Additionally, the city held a 30-day comment period.

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

During the public meetings many participants stated that there is a need for additional low-income, transitional housing, housing for families, and also affordable market rate housing within the jurisdiction. It was also stated that it would be appreciated if the city was able to serve as a liaison between local organizations and nonprofits to promote partnerships to develop housing and/or provide supportive services.

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

Comments received were accepted for consideration by the city.

## **Needs Assessment and Gaps Analysis**

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

**Template:** purpose of table is show inventory and show gap; where do we get this data? Jeff says when doing consultation with COOHIO, ask for data directly. If not, do best to describe or consult with Butler Co. Then go back to regional board, look at Butler Co.

**OPTIONAL Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	67	18	127							15		155	
Transitional Housing													
Permanent Supportive Housing	24	11	60		32							15	
Other Permanent Housing	#	#	#	#	#								
Sheltered Homeless						147	212	7	#				
Unsheltered Homeless						76	86	4	#				
<b>Current Gap</b>										15	#	170	#

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

**OPTIONAL Housing Needs Inventory and Gap Analysis Table**

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	11,250		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	4,791		
Rental Units Affordable to HH at 50% AMI (Other Populations)	3,014		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		#	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		#	
<b>Current Gaps</b>			#

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

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

***Homeless as defined in 24 CFR 91.5***

Per data attained by the most recent Point in Time Count (PIT) in 2022, the city has approximately 27 chronically homeless individuals/households. The city uses the Chronically homeless definition provided in 24 CFR 91.5. This includes persons/families that are without a fixed, regular, and adequate nighttime residence; whose primary nighttime residence that is public or private place not designed for or ordinarily used as a regular sleeping accommodations for human beings (e.g. car, park, abandoned building, etc.); persons' families residing in a shelter or place not meant for human habitation; and/or unaccompanied youth under 25 years of age or families with children and youth, who do not otherwise qualify as homeless. At the time of the count there were approximately 27 unsheltered individuals, 76 unsheltered households, 131 households in emergency shelter(s), and 16 households in transitional housing. As of the winter of 2022/23, one local housing organization reported a waiting list of approximately 155 chronically homeless persons on their waiting list.

***At Risk of Homelessness as defined in 24 CFR 91.5***

The City of Hamilton uses the definition provided in 24 CFR 91.5 to define persons/families At Risk of Homelessness as: Persons/families that have an annual income below 30 percent of median family income for the area, as determined by HUD. Per recent census data approximately 16.4% of Hamilton's population are considered to have income below the federal poverty number. As such, Hamilton has approximately 10,323 persons At Risk of Homelessness.

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

The City uses HUD's definition to define persons Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. More specifically the definition used is: Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (ii) Has no other residence; and (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing. The city has approximately seventeen (17) emergency shelter beds for domestic violence victims. One local domestic violence shelter reports substantial requests for housing placement.

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

Thirty-two (32) veteran beds were counted at the time of the most recent PIT count. The Butler County Board of Commissioners offers approximately twelve (12) beds/units, six (6) units, and twelve (12) HMIS beds for homeless individuals and families with a disability. Additionally, the city recognizes and has received feedback stating that persons being recently released from incarceration are in need of housing assistance to prevent homelessness. Numbers of persons in this category fluctuate with release dates and as the rate of arrests increases or decreases.



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

At the present, the city has a number of agencies that aid in assisting qualifying populations. More specifically, the following organizations/agencies provide services to the homeless, veterans, children, victims of domestic violence, persons suffering from addiction, etc.: the YMCA, YWCA, Serve City, Neighborhood Housing Services, United Way, Salvation Army, Community Development Professionals, Family Promise, HOPE House, Partnerships for Housing, Sojourner Recovery, Talbert House, Women Helping Women, Butler County Educational Services, LifeSpan, Living Waters Ministries, Parachute, Supports to Encourage Low-income Families, and local faith-based organizations, etc.

***Describe the unmet housing and service needs of qualifying populations:***

***Homeless as defined in 24 CFR 91.5***

Through discussions during the public meetings and feedback acquired by local residents, stakeholders, and service providers the primary unmet housing need discussed included the need for additional low-income rental housing for single persons and larger families. A local agency reported that they have approximately 155 persons on a waiting list for their shelter and 15 additional on their permanent supportive housing waiting list. Additionally, it was suggested that supportive services (e.g. case management, financial assistance, childcare services, etc.) be developed and provided to homeless persons.

***At Risk of Homelessness as defined in 24 CFR 91.5***

One of the populations identified as being at risk for homelessness and experiencing a need for housing includes, but may not be limited, to persons being recently released from incarceration. As described by persons attending the public meetings; there are minimal resources for housing for persons recently released from incarceration. Unfortunately, many landlords and property owners are unwilling to rent to such persons. Additional services to provide housing placement are needed for said persons.

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

No unmet housing needs were identified concerning persons fleeing, or attempting to flee, domestic violence, sexual assault, stalking, or human trafficking.

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

Through discussions and public meetings persons being released from incarceration were identified as an additional population requiring services and/or housing assistance to prevent homelessness.

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

As identified by public comments, the city may benefit from additional transitional housing for individuals and families. There is a shortage in the number of available transitional housing units and an increase in the number of families in need of the said housing. Additionally, there is a proven gap in the number of Permanent Supportive Housing units requested and the number actually available.

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

No additional characteristics were identified or deemed necessary.

***Identify priority needs for qualifying populations:***

Priority needs listed during the public meetings and also the city’s most recent Analysis of Impediments to Fair Housing include: A lack of affordable housing units for rent and homeownership; The concentration of subsidized housing in certain areas of the jurisdiction; the Lack of knowledge of how to pursue homeownership among low and moderate-income residents in the jurisdiction; and the Lack of Fair Housing knowledge and rights among residents in the jurisdiction.

***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 city consulted with the Butler County Housing & Homeless Coalition, local housing providers, developers, homeless service providers, shelters, and other relevant agencies regarding the level of needs and gaps in the city’s shelter and housing inventory. Additionally, the city reviewed available census data relevant to the topic.

## **HOME-ARP Activities**

**Template:**

***Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:*** The city released applications and provided notice of the public meetings fifteen (15) days prior to the meeting dates. Notice was posted in the local Journal News and also the city's social media posts. Preceding the public meetings all interested parties were afforded an additional twenty (20) days to submit their applications for funding. Once applications were received city staff and NDD representatives reviewed all applications for compliance and eligibility. Projects were chosen based upon the needs identified during the public meetings, discussions, and the evaluation of developers and subrecipients capacity to successfully complete the project(s).

***Describe whether the PJ will administer eligible activities directly:***

Projects will be administered by developers and subrecipients.

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

No HOME-ARP administrative funds will be provided to a developer/subrecipient prior to HUD's acceptance of the HOME-ARP allocation plan.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

**Template:**

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 35,000		
Acquisition and Development of Non-Congregate Shelters	\$ 0.00		
Tenant Based Rental Assistance (TBRA)	\$ 250,000.00		
Development of Affordable Rental Housing	\$ 835,686.40		
Non-Profit Operating	\$ 70,042.90	5 %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 210,128.70	15%	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,400,858.00</b>		

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

The city determined the best method of distribution of funds would be most successful by assessing the comments and needs identified in the public meetings and through the analysis of data sought and identified during the process. More specifically, it was reported that the city has a deficit in the number of TBRA, affordable housing options, and supportive services. As such, the city decided to commit funds to projects that will address the needs identified.

***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:***

The city has a deficit in the number of TBRA, affordable housing options, and supportive services as reported by the local shelters, housing providers, developers, and service providers. In response to this feedback, the city wishes to allocate funds to projects that will address the needs identified.

**HOME-ARP Production Housing Goals**

**Template**

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

Under the proposed activities it is anticipated that the city's subrecipients and developers may create/support approximately 40 affordable rental housing units.

***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:***

Under NHSH's proposed duplex projects, as many as six (6) rental units may be developed and are anticipated to produce safe, decent, and affordable units for persons at risk of homelessness.

## Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- 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.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.**

**For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

### **Template:**

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

Both organizations' proposed projects anticipate providing preference to persons defined as homeless or At Risk of Homelessness. Nonetheless, persons who classify under the other identified qualifying populations (e.g. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking; Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability) will be considered as well.

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

By identifying and encouraging applicants that are extremely-low income/very-low income both projects have the potential of positively impacting the need (gap) for TBRA and affordable housing units.

### **Referral Methods**

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in

its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE 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 CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

**Template:**

***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):***

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

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

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

**Limitations in a HOME-ARP rental housing or NCS project**

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

### **Template**

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

The city does not anticipate implementing any limitations/preferences; all QPs will be eligible and served via first come first served waitlist.

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

The city does not anticipate implementing any limitations/preferences; all QPs will be eligible and served via first come first served waitlist.

***If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation***



*through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):*

The city does not anticipate implementing any limitations/preferences; all QPs will be eligible and served via first come first served waitlist.

DRAFT

## HOME-ARP Refinancing Guidelines

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

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

Enter narrative response here:

- ~~*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.*~~

Enter narrative response here:

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

Enter narrative response here:

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

Enter narrative response here:

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

Enter narrative response here:

- ~~*Other requirements in the PJ's guidelines, if applicable:*~~

Enter narrative response here: