

HOME-ARP Allocation Plan Checklist

Participating Jurisdiction: _____

eCon Planning Suite Info:

Title: _____

Version: _____

AAP Associated Con Plan Title: _____

AAP Program Year: 2021

Consortium Lead Entity (list members of consortium) _____

Instructions and Guidance

This checklist is for the HOME-ARP allocation plan which is a substantial amendment to the PJ's FY 2021 annual action plan. The PJ must comply with the following requirements in Notice CPD-21-10:

Requirements for the Use of Funds in the HOME-ARP Program.:

- Consult with the required agencies and service providers listed in CPD-21-10.
- Make public notification of the amount of the HOME-ARP allocation and the range of activities that the PJ may undertake and provide for a public comment period of at least 15 calendar days.
- Hold at least one public hearing during development of the plan and prior to submission.
- Develop a HOME-ARP allocation plan that describes consultation, public participation, and includes the required elements described in CPD-21-10.
- Create a substantial amendment to the FY 2021 annual action plan in the eCon Planning Suite and upload the HOME-ARP allocation plan at the "HOME-ARP allocation plan" attachment point.
- Upload the SF-424; SF-424B; SF-424D; and required certifications for HOME-ARP in the eCon Planning Suite and submit the plan to HUD.
- Make the final accepted HOME-ARP allocation plan public.

Governing requirements for HOME-ARP funding include:

- Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2), signed into law on March 11, 2021;
- Notice CPD-21-10: Requirements for the Use of Funds in the HOME-American Rescue Plan Program
- Waivers and Alternative Requirements for HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) Program

Published guidance can be found at https://www.hud.gov/program_offices/comm_planning/home-arp and <https://www.hudexchange.info/programs/home-arp/>.

Overall process for HOME-ARP allocation plan submission and Field Office review

PJs must make a substantial amendment to their Fiscal Year (FY) 2021 annual action plan in IDIS and upload the HOME-ARP allocation plan as a Microsoft Word or PDF attachment next to the "HOME-ARP allocation plan" option on the AD-26 screen (for PJs whose FY 2021 plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 plan is a Year 1 annual action plan that is part of the 2021 consolidated plan), unless instructed by HUD to follow a different submission procedure. PJs must also

attach the SF-424, SF-424B, SF-424D, and required certifications as attachments on AD-25 or AD-26 screen, as applicable, and change the action plan status to "Submitted for Review." PJs are not required to make changes to any other screens in the annual action plan or consolidated plan in the eCon Planning Suite. However, PJs may, but are not required to, add HOME-ARP action plan projects on the AP-35 screen. HUD must review a PJ's HOME-ARP allocation plan to determine that it is:

- Substantially complete, and
- Consistent with the purposes of ARP.

When the plan is disapproved:

1. HUD will notify the PJ in writing with the reasons for disapproval, in accordance with 24 CFR 91.500(c).
2. A PJ should revise or resubmit the plan for HUD review within 45 days after the first notification of disapproval.
3. HUD will respond to accept or disapprove the resubmitted plan within 30 days of receiving the revisions or resubmission.

When the plan is accepted:

1. Upon acceptance, the CPD Director must send the signed contracting memo and a copy of the PJ's grant agreement to Fort Worth Accounting.
2. The Field Office must also notify the PJ that the plan is approved by sending the transmittal letter (electronically) and changing the status of the amendment to "Review Completed" in the eCon Planning Suite.

Review Checklist

SF-424s

The PJ submitted complete and fully executed SF-424, SF-424B, and SF-424D as an attachment(s) on the AD-25 or AD-26 screen in the eCon Planning Suite. Yes No

The forms include all the following required information:

- The SF-424, SF-424B, and SF-424D form is executed by the designated authorized certifying official. Yes No
- Award Amount on the SF-424 is correct (block 18(a)). Yes No
- The correct CFDA number has been listed (block 11). Yes No
- The SF-424 form contains the correct DUNS Number and EIN in blocks 8 (b) and(c)). Yes No
- The applicable assurances attached (SF-424B and 424D). Yes No

Certifications

The required, executed certifications were uploaded to the AD-25 or AD-26 eCon Planning Suite screen, as applicable. Yes No

(Note: The required certifications include:

- *Affirmatively Further Fair Housing;*

- *Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;*
- *Anti-Lobbying;*
- *Authority of Jurisdiction;*
- *Section 3; and,*
- *HOME-ARP specific certification.)*

Consultation

At a minimum, the PJ consulted with the required agencies and service providers: Yes No

The list of agencies consulted includes:

- CoC(s) serving the jurisdiction’s geographic area. Yes No
(Note: local PJs must consult with all CoCs serving the jurisdiction, State PJs are not required to consult with every CoCs in the state)
- Homeless service providers. Yes No
- Domestic violence service providers. Yes No
- Public housing agency(ies) (PHA) serving the jurisdiction’s geographic area. Yes No
(Note: local PJs must consult with all PHAs (including statewide or regional PHAs) serving the jurisdiction, State PJs are not required to consult with every PHAs in the state)
- Public agencies that address the needs of qualifying populations. Yes No
- Public or private organizations that address civil rights and fair housing. Yes No
- Public or private organizations that address the needs of persons with disabilities. Yes No

(Note: Consultation is required to occur prior to development of the plan)

The plan describes the PJ’s consultation process. Yes No

The plan includes a list of organizations consulted and summarizes feedback received from those entities. Yes No

Public Participation

The PJ held at least one public hearing during development of the plan and before submitting its plan to HUD. Yes No

Date of Public Hearing: _____

The PJ provided a public comment period of at least 15 calendar days. Yes No

Comment Period Start Date: _____

Comment Period End Date: _____

(Note: Public notice about the public hearing and comment period should provide information about available accommodations)

The plan describes the PJ's public participation process including efforts made to broaden public participation. Yes No

The plan includes a summary of comments received through the public participation process Yes No

The plan describes any comments or views not accepted and the reasons why. Yes No

Needs Assessment and Gaps Analysis

The PJ evaluated the size and demographic composition of **all four** of the qualifying populations. The narrative describes:

- Homeless as defined in 24 CFR 91.5 Yes No
- At risk of Homelessness as defined in 24 CFR 91.5 Yes No
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD Yes No
- Other Populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those at greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above. Yes No

(Note: Data alone is not sufficient to meet this requirement, the Notice specifies that the narrative must describe each qualifying population.)

The plan describes the unmet housing and service needs of the qualifying populations. Yes No

The plan identifies gaps within the PJ's current shelter and housing inventory and service delivery system.

Yes No

The plan identifies the characteristics of housing associated with instability and an increased risk of homelessness. Yes No N/A

(Note: this narrative is only required if the PJ will use this criterion (i.e., "lives in housing that has characteristics associated with instability and an increased risk of homelessness") to determine an individual or family's eligibility as a qualifying population under the "Other Populations-At Greatest Risk of housing Instability" definition as established in Section IV.A.4.2.ii.G. of the Notice CPD-21-10)

The plan identifies the PJ's priority needs for all four of the qualifying populations. Yes No

The plan explains how the PJ determined the level of need and gaps in its shelter and housing inventory and service delivery systems. Yes No

HOME-ARP Activities

The plan describes the PJ’s method(s) for soliciting applications for funding and/or selecting developers, service providers, and/or subrecipients. Yes No

The plan identifies whether the PJ will administer eligible activities directly. Yes No

If all or a portion of the PJ’s HOME-ARP administrative funds were 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, the plan identifies the subrecipient or contractor and describes its role and responsibilities in administering all of the PJ’s HOME-ARP program. Yes No N/A.

(Note: if the PJ plans to use a subrecipient or contractor to administer all or a portion of its HOME-ARP program but does not provide the information required by CPD Notice 21-10, the PJ’s plan is substantially incomplete.)

The plan identifies the amount of planned HOME-ARP funding for each eligible HOME-ARP activity including administrative and planning activities. Yes No

(Note: if the plan describes an activity or project that may constitute a violation of the Fair Housing Act (e.g., single sex housing or NCS, adult-only housing or NCS, limiting assistance for persons with a specific disability, etc. please contact your OAHF desk officer.

Note: if the plan indicates that the PJ will use Coordinated Entry (CE) as the sole referral method, ensure that the PJ intends to expand the CE to include all four QP.

Note: if the PJ proposes to allocate funds for an activity not listed as an eligible HOME-ARP activity in CPD Notice 21-10, the PJ’s plan must be deemed inconsistent with ARP. The plan is substantially incomplete if the PJ fails to identify the amount of HOME-ARP funds for the eligible HOME-ARP activities the PJ plans to undertake.)

The plan demonstrates that any planned funding for non-profit operating assistance, non-profit capacity building, and administrative costs is within statutory limits. Yes No

(Note: the limits are 5% for non-profit operating assistance, 5% for non-profit capacity building, and 15% for administration and planning).

The plan describes how the characteristics of the PJ’s shelter and housing inventory and service delivery system, and the needs identified in the PJ’s gap analysis provided a rationale for its plan to fund eligible activities. Yes No

Production Housing Goals

The plan estimates the number of affordable rental housing units for qualifying populations that a PJ will produce or support with its HOME-ARP allocation. Yes No

The plan describes the specific affordable rental housing production goal that the PJ to achieve and describes how it will address the PJ’s priority needs. Yes No

Preferences

The plan identifies 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. Yes No

(Note: if the preference may violate the Fair Housing Act (e.g., single sex housing or NCS, adult-only housing or NCS, limiting assistance for persons with a specific disability, etc. please contact your OAHF desk officer.

Note: If the plan indicates that the PJ has used or will use a preference to select projects (e.g., bonus points in a NOFA for permanent supportive housing for the homeless) or it describes an activity or project that will provide a preference, the PJ must describe those preferences in the plan.

Note: if the plan indicates that the PJ will use Coordinated Entry (CE) as a referral method, ensure that the PJ included any prioritization used by the CE in the preferences section.

Note: If no, skip the remaining questions in this section)

The plan explains 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 category of qualifying population, consistent with the PJ's needs assessment and gap analysis. Yes No N/A

The plan describes how the PJ will still address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in a preference through the use of HOME-ARP funds. Yes No N/A

(Note: the PJ's HOME-ARP program may not exclude any of the QP.)

Refinancing Guidelines

Will the PJ allocate funding to refinance existing debt secured by multifamily rental housing rehabilitated with HOME-ARP funds? Yes No

(Note: If no, skip the remaining questions in this section, if yes then answer the following questions)

If a 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 plan includes the PJ's HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). Yes No

The guidelines include each of the following required elements: Yes No

- Establishes 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 Yes No
- Requires 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. Yes
 No

- States whether the new investment is being made to maintain current affordable units, create additional affordable units, or both. Yes No
- Specifies the required compliance period, whether it is the minimum 15 years or longer. Yes
 No
- States that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG. Yes No

**Final Plan Sign-Off
Staff & Management**

Title of Substantial Amendment in the eCon Planning Suite	Date PJ Submitted SF-424s in the eCon Planning Suite	Checklist Approval Date (insert "N/A" if revisions needed)	Date FO Changed Plan Status To "Review Completed"

Based on my review of the HOME-ARP allocation plan against the requirements, I have determined the plan is:

Accepted Date review completed: _____

OR

Disapproved Date review completed: _____

(Note: Select one or more reasons for disapproval below)

Inconsistent with the Purposes of the ARP Date returned for revision: _____

Please note that if the PJ proposes to allocate funds for an activity not described as eligible in CPD Notice 21-10, the PJ's plan must be deemed inconsistent with ARP. The HOME-ARP eligible activities are limited to:

- Rental housing
- TBRA
- Supportive services
- Acquisition and/or development of non-congregate shelter
- Non-profit operating assistance or capacity building
- Administration and planning costs for HOME-ARP

Reasons the plan is inconsistent with the ARP:
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Substantially Incomplete Date returned for revision or certifications rejected: _____

The plan is substantially incomplete if the reviewer checks one or more of the following reasons:

The HOME-ARP allocation plan was developed without the required citizen participation or consultation, or the plan does not describe those efforts.

- The plan fails to satisfy all the required elements of Notice CPD-21-10. including failure to identify the amount of HOME-ARP funds for the eligible HOME-ARP activities that the PJ intends to undertake.
- The plan does not identify and describe the responsibilities of the subrecipient or contractor administering all of a its HOME-ARP award, if applicable.
- HUD rejected the certification(s) as inaccurate.

Brief description of deficiencies or list of certifications rejected:

Steps for disapproval/following disapproval:

1. HUD will notify the PJ in writing with the reasons for disapproval.
2. A PJ may revise or resubmit the plan for HUD review within 45 days after the first notification of disapproval.
3. HUD will respond to accept or disapprove the resubmitted plan within 30 days of receiving the revisions or resubmission.

Steps for acceptance/following acceptance:

SIGNED:

Reviewer: _____ Date: _____

Program Manager: _____ Date: _____

CPD Director: _____ Date: _____

AFTER CHECKLIST APPROVAL

1. Send the signed contracting memo and a copy of the PJ’s HOME-ARP grant agreement to Fort Worth Accounting.
2. Send template transmittal letter to the PJ indicating that the plan is approved.
3. Change the status of the annual action plan amendment to “Review Completed” after the memo, grant agreement, and transmittal letter are sent.