

## Common Issues in HOME-ARP Allocation Plans

### Consultation

1. Failure to consult with all of the required agency types/organizations listed in the Notice or consulting with them after they have developed the plan.

Required organizations:

- CoC(s) serving the jurisdiction's geographic area. *(must include all CoCs serving the area for local PJs)*
- Homeless service providers.
- Domestic violence service providers.
- Public housing agency(ies) (PHA) serving the jurisdiction's geographic area. *(must include all PHAs (including statewide or regional PHAs) serving the jurisdiction for local PJs)*
- Public agencies that address the needs of qualifying populations.
- Public or private organizations that address civil rights and fair housing.
- Public or private organizations that address the needs of persons with disabilities.

### Public Participation Process

1. Failure to follow applicable fair housing and civil rights requirements and procedures for effective communication, accessibility and reasonable accommodations for persons with disabilities or to provide meaningful access to participation by limited English proficient (LEP) residents that are in the PJ's current citizen participation plan. For example, failure to provide a means for citizens to request an accommodation or translation services for a public meeting.
2. Failure to describe the PJs efforts to broaden public participation.

### Needs and Gaps Analysis

1. Failure to describe all four of the qualifying populations (QP) in the needs assessment section of the plan. The Notice requires that PJs evaluate the size and demographic composition of each of the QP within its boundaries and assess the unmet needs of those populations. Please note that data alone is not sufficient to meet this requirement, however it should be used to support the PJ's analysis.

In particular, failure to include an assessment of the following populations or to describe their unmet needs:

- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD (page 6-7).
- 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 other QP (page 7-8).

2. Failure to describe both the housing and service needs of all four of the QP. For example, the PJ describes the need for rental housing and TBRA but neglects to discuss service and non-congregate shelter needs.

### HOME-ARP Activities

1. Narrative that describes activities, projects, or programs that may violate the Fair Housing Act.  
Examples:
  - Single-sex housing or non-congregate shelter
  - Adult-only housing or non-congregate shelter
  - Housing or shelter that is limited for persons with a specific disability
2. Narrative in the plan indicates that a PJ will **only** serve certain QP or subpopulations of a QP through its HOME-ARP program and it intends to exclude other QP from participating. Preferences are permitted; however, a PJ may not limit eligibility for all projects such that any of the four QP are excluded.

### Preferences

1. Narrative in the plan describes a project selection process including NOFAs or RFPs published prior to approval of the HOME-ARP allocation plan that implement a preference (e.g., bonus points for permanent supportive housing projects that serve the literally homeless), however that preference is not described in the plan. In addition, instances in which the NOFA/RFP uses a definition of “homeless” or any other QP other than the HOME-ARP definitions.
2. Narrative in the plan describes activities, projects, or programs targeted for one QP (e.g., the homeless) or a subpopulation of a QP (e.g., the chronically homeless or homeless veterans) but the PJ failed to describe preferences in the plan.
3. Narrative in the plan describes use of Coordinated Entry (CE) for any activity, project, or program without any indication that the PJ will expand the CE to include all four QP or use the CE in conjunction with other referral methods as required in the Notice (page 10-11).
4. Narrative in the plan describes use of the CE for referrals, but the PJ did not describe the prioritization implemented by the CE in the preferences section.