

2021 HOME-ARP ALLOCATION PLAN

Amendment to the 2021 Annual Action Plan



**City of Akron, Ohio
Dan Horrigan, Mayor**

**Office of Integrated Development
Department of Planning and Urban Development
March, 2023**

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 Akron conducted individual consultation meetings with the Akron / Barberton / Summit County Continuum of Care, the Akron Metropolitan Housing Authority, the Fair Housing Contact Service, the Department of Jobs and Family Services, Akron Battered Women’s Shelter (Hope and Healing Survivor Resource Center), and Northeast Ohio Veterans Administration Healthcare system to explain the HOME-ARP funding opportunity, assess existing conditions/needs and discuss the best use of HOME-ARP funds. Additionally, the City created a survey to receive feedback and prioritize needs from homeless service providers who work with and have knowledge of qualified populations needs. The survey was available online from April 25, 2022, through May 31, 2022. The City received 13 responses from area providers and organizations.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Continuum of Care Steering Committee	Continuum of Care Lead Advisory Group serving the Akron area / Homeless Service Providers (see the full list of participants on page 5)	Zoom meeting – Jan. 26, 2022	Feedback was extensive and included numerous comments and recommendations. Comments included the need for landlord mitigation, new construction of affordable housing, waiver payment assistance, housing for sex offenders, more transitional shelter space, more one-bedroom options, the need for family tax credit units, more PSH beds in general and specifically for families, the need for a new build or rehabilitation of an existing structure to be operated by an agency and more re-entry housing.
Akron Metropolitan Housing Authority	Public Housing Authority	Zoom meeting – Jan. 27, 2022	AMHA would defer to the CoC on what is the primary need but with AMHA one-bedroom families have the longest waiting list (both homeless and non-homeless). There is a need for two-bedroom units over three or four bedrooms. We could use a smaller version of Stoney Pointe (PSH for previously homeless drug addicted/mental health issues) , but the concern is the specific population served. There is a lack of capacity of workers to provide services. There is a need for supportive services.
Battered Women’s Shelter	Domestic Violence Service Provider	Zoom meeting – March 3, 2022	Primary need is for more quality affordable rental housing – the existing selection is subpar. Mental health issues and drug dependency are rising in their clients. Front door of more emergency housing and a back door of affordable apartments.

			Short term need for seniors (ten to twelve beds). A new homeless shelter is needed for those that don't fit at the Haven of Rest and other places. A building facility is needed for young men.
Dept. of Jobs and Family Services	Public Agency that Addresses the Needs of the Qualifying Population	Zoom meeting – March 3, 2022	Housing gap for homeless if a child is NOT involved. Need more assistance for single individuals and single couples. There is no physical place for individuals to stay. Need to separate the younger and older populations.
Fair Housing Contact Service	Public or Private Organization that Addresses Fair Housing, Civil Rights and the Needs of Persons with Disabilities	Zoom meeting – September 27, 2022	They are seeing problems with landlords that don't pay taxes and then their tenants end up losing everything. Rent to own scams – education and workshops are needed. More tenant / landlord programs are needed. Need more two and three bedroom units. Category 1 homeless are already targeted a lot.
Continuum of Care Executive Director	Continuum of Care serving the Akron area	Phone call – January 11, 2023	Expressed concern about CoC needs
Northeast Ohio Veterans Administration Healthcare System	Veterans	Zoom meeting – January 23, 2023	In general, resources for Veterans are abundantly available. Supports the idea of additional affordable units, permanent supportive housing and TBRA.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.

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

See above comments. A complete list of the Continuum of Care Steering Committee members follows.

Akron /Barberton / Summit County Continuum of Care

Steering Committee Members

Agency

Support Category

ACCESS Shelter	Homeless Provider
Akron AIDS Collaborative	Support Services
Akron Children’s Hospital	Health Care
Akron Fire Department	Public Sector
Akron Metropolitan Housing Authority	Public Agency
Akron N.A.A.C.P.	Support Services
Akron Police Department	Public Sector
Akron Summit Community Action, Inc.	Support Services
Akron Urban League	Support Services
CANAPI	Homeless Provider
City of Akron	Public Sector
City of Barberton	Public Sector
City of Cuyahoga Falls	Public Sector
Coleman Health Services	Support Services
Common Threads Closet	Support Services
Community Health Center	Homeless Provider
Community Legal Aid	Support Services
Community Support Services	Homeless Provider
Dreams Academy	Support Services
Fair Housing Contact Service	Support Services
Fallen Fathers Foundation	Support Services
Family & Community Services	Homeless Provider
Family Promise	Homeless Provider
Forever R Children	Support Services
Freedom BLOC	Support Services
GAR Foundation	Foundation
Goodwill Industries	Support Services
Guys & Gals Community Partnership, Inc.	Support Services
Harmony House	Homeless Provider
Haven of Rest	Homeless Provider
Hope and Healing (Battered Women’s Shelter)	Homeless Provider
Hope Farm	Support Services
Humility of Mary Housing	Homeless Provider
I Promise School	Housing Provider
Joanna House II	Housing Provider
Legacy III	Homeless Provider

Love Akron	Support Services
Mustard Seed Development Center	Support Services
NISRE (The EXIT Program)	Support Services
North Coast Community Homes	Homeless Provider
Ohio Multi-County Development Corporation	Homeless Provider
Oriana House	Homeless Provider
Peter Maurin Center	Homeless Provider
Portage Path Behavioral Health	Support Services
Project Rise (Akron Public Schools)	Homeless Support
Salvation Army	Support Services
Shelter Care	Homeless Provider
Snow Angels	Support Services
South Street Ministries	Support Services
Stark State College	Public Sector
Students With a Goal (S.W.A.G.)	Support Services
Summit County	Public Sector
Summit County ADM Board	Public Sector
Summit County Children Services	Public Sector
Summit County Department of Job and Family Services	Public Sector
Summit County Juvenile Court	Public Sector
Summit County Public Health	Public Sector
Summit DD	Public Sector
Tarry House	Homeless Provider
The Homeless Charity	Homeless Provider
Tow Path Trail High School	Support Services
Truly Reaching You	Homeless Provider
United Way of Summit & Medina	Homeless Provider
University of Akron	Public Sector
Veteran’s Health Administration	Veteran Provider
Victim Assistance Program	Support Services

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: 1/27/2023***
- ***Public comment period: start date - 1/27/2023 end date - 2/27/2023***
- ***Date(s) of public hearing: 1/30/2023***

Describe the public participation process:

Before developing the Amendment to the 2021 Annual Action Plan, the City of Akron consulted with the CoC serving the Akron/Summit County area, homeless and domestic violence service providers, Veterans' groups, the Akron Metropolitan Housing Authority, the Fair Housing Contact Service and other agencies that address the needs of the qualifying populations.

The City of Akron Department of Planning and Urban Development placed an advertisement soliciting comments in the Akron Beacon Journal on January 12, 2023 and again on January 27, 2023. Copies of the Substantial Amendment to the 2021 Consolidated Action Plan for HOME – ARP were made available for public review and comment for 30 days. The document was placed on the City of Akron website on January 12, 2023.

The substantial amendment was presented to Akron Planning Commission on January 20, 2023 and Akron City Council on January 30, 2023. City Council includes two meetings, the first before City Planning Committee at 1:00 p.m. in the afternoon and the second before all of Akron City Council at 7:00 p.m. in the evening.

Describe efforts to broaden public participation:

In addition to the numerous meetings and consultations held specifically for the HOME-ARP allocation, three public hearings were held (see above) at Akron Planning Commission and Akron City Council. In addition to the Public Notice published in the Akron Beacon Journal, consultation letters were sent via email to area stakeholders informing them of the meetings and soliciting feedback. The CoC's staff and members are continually expanding the coalition to

bring new agencies and individuals who have an interest in preventing and ending homelessness into the collaborative.

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

The proposed use of HOME-ARP funding was presented to Akron City Planning Commission, City Planning Committee and Akron City Council at three separate public hearings. At each meeting, area organizations including the Summit County Continuum of Care, the Black Economic and Wellness Coalition of Akron, Summit County Public Health, the United Way of Summit and Medina County, Community Support Services, Access, Inc. and Habitat for Humanity voiced their support for the intended use of the funding along with members of Planning Commission, Planning Committee and City Council.

Specific comments applauded the use of funding for affordable housing, tenant based rental assistance and the provision of legal counsel for residents being evicted. It was noted that in Cuyahoga County keeping people in their homes has saved millions of dollars in social service costs along with being the right thing to do. One commenter stressed that our assistance programs need to have a system in place to give all populations a voice.

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

All comments were accepted and considered.

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:

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	96	34	194	194	6								
Transitional Housing	40	11	167	167	30								
Permanent Supportive Housing	212	79	471	471	89								
Other Permanent Housing	N/A	N/A	N/A	N/A	N/A								
Sheltered Homeless						70	236	38	86				
Unsheltered Homeless						0	79	1	0				
Current Gap										#	#	#	#

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	42,365		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	10,590		
Rental Units Affordable to HH at 50% AMI (Other Populations)	5,980		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		10,670	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		6,140	
Current Gaps			16,810

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

Homeless as defined in 24 CFR 91.5 includes individuals or families who lack a fixed, regular and adequate nighttime residence. This also includes individuals or families living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing and hotels and motels paid for by charitable organizations or by federal, state or local government programs).

The Akron / Barberton / Summit County Continuum of Care, in partnership with the City of Akron, conducts a point-in-time count annually that documents how many people are residing in shelters or are sleeping in unsheltered areas on a given night. In 2021, 394 persons were counted in the one-night count undertaken on January 26, 2021 (315 sheltered / 79 unsheltered). This included 158 persons in emergency shelters (42 under the age of 18), 141 in transitional shelters (11 below the age of 18) and 16 at the Safe Haven (permanent non-supportive housing). In Summit County, a total of 4,036 persons received assistance at shelters in 2021. In 2022, 441 homeless persons were counted in the one-night count undertaken on January 25, 2022 (388 sheltered, 53 unsheltered). This included 213 at emergency shelters (47 under the age of 18), 160 in transitional shelters (12 under the age of 18) and 15 at the Safe Haven. The CoC racial equity assessment identified that brown and black persons made up 51% of the population accessing shelters, but only make up 30% of the population in Akron and 14.5% of the population in Summit County.

At Risk of Homelessness as defined in 24 CFR 91.5

At risk of homelessness as defined in 24 CFR 91.5 means individuals or families who have an annual income below thirty percent of area median family income who do not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter and meet one of the following conditions; they have moved because of economic reasons two or more times during the last 60 days immediately preceding an application for homeless prevention assistance or they are living in the home of another due to economic hardship or have been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days or they live in a hotel or motel at their own expense or they live in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or they live in a larger housing unit in which their resides more than one and a half persons per room or they are exiting publicly funded institutions or systems of care or otherwise live in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the City of Akron's Consolidated Plan.

High housing costs remain the primary driver of homelessness and housing insecurity in Akron. Excessively cost burdened households teeter on the edge of losing their homes and

are at a high risk of homelessness as referenced in the City’s 2020-2024 Consolidated Plan and the most recent CHAS data. According to the most recent Comprehensive Housing Affordability Strategy, a total of 18,970 renter households earning less than thirty percent of area median income in the Akron MSA have a cost burden of greater than thirty percent. Of these, 10,355 have a cost burden of greater than fifty percent. 73% of all renter households earning 50% AMI or less are cost burdened or severely cost burdened. According to the City of Akron 2020-2024 Consolidated Plan an additional 9,995 owner households have a cost burden of greater than thirty percent. Recent data for Ohio supplied by the National Low Income Housing Coalition estimates that, in the State of Ohio, for every 100 extremely low-income renter households there exists only 40 affordable units. In Akron, this would translate into a shortage of over 6,000 units of affordable housing for cost burdened renter households earning less than thirty percent AMI.

Cost burden City of Akron MSA

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	10,590	8,690	14,025
Household Income >30% to <=50% HAMFI	5,980	1,525	8,595
Household Income >50% to <=80% HAMFI	2,230	90	9,220
Household Income >80% to <=100% HAMFI	110	0	3,290
Household Income >100% HAMFI	60	50	7,235
Total	18,970	10,355	42,365
Source: Comprehensive Housing Affordability Strategy with 2015-2019 American Community Survey data			

The extent of housing insecurity is evident in Akron’s high number of evictions. Akron has the highest eviction rate in Ohio and some studies have Akron in the top 25 cities in the country in terms of eviction rate. Economic conditions combined with a lack of affordable homes, poor housing conditions and a mostly older rental stock have led to near crisis conditions. Recent data suggests that approximately 20% of renters in Summit County could be at risk for eviction. More than twenty percent of Akron’s population lives in poverty and about seven families are evicted every day. In 2022, it was estimated that Akron had 300

evictions per month. For the year, this would be upward of 3,000 evictions. If even a modest percentage of these evictions result in homelessness that is a significant number. In a poll taken for this plan, the development of affordable housing was the number one need requested by homeless providers. 2022 data for Summit County’s 211 referral service line operated through the United Way of Summit and Medina Counties reveals that food and housing share the top spot in requests, each accounting for 28% of calls received for referred services.

Income by Housing Problems

Income by Housing Problems (Renters only)	Household has at least 1 of 4 Housing Problems	Household has none of 4 Housing Problems OR cost burden not available, no other problems	Total
Household Income <= 30% HAMFI	10,670	3,355	14,025
Household Income >30% to <=50% HAMFI	6,140	2,450	8,595
Household Income >50% to <=80% HAMFI	2,655	6,565	9,220
Household Income >80% to <=100% HAMFI	215	3,075	3,290
Household Income >100% HAMFI	260	6,970	7,235
Total	19,950	22,415	42,365

Housing conditions also severely impact low-income households. According to the CHAS, the City of Akron has 10,670 households that are between 0-30% of the AMI that are experiencing one or more severe housing problems, and 6,140 households that are between 30-50% AMI with one or more severe housing problems. In Akron, 16,810 households are risk of homelessness due to housing instability alone. These households lack safe, economically sustainable housing and are at increased risk of housing instability and homelessness. Based on this data, households that spend more than 30% of their income and live in substandard housing are considered to be unstably housed and at risk of homelessness. The National Low-Income Housing Coalitions’ most recent state housing needs report notes that there is a shortage of 254,545 housing units available to people at extremely low incomes in Ohio.

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

The domestic violence population includes individuals or families who are fleeing, or are 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; they have no other residence and lack the resources or support networks (e.g., family, friends, and faith-based or other social networks) to obtain other permanent housing.

In addition to individuals fleeing domestic/dating violence and sexual assault and stalking, this category also includes people experiencing human trafficking, which includes sex and labor trafficking. People experiencing this kind of violence may have a home but are unable/unwilling to return to it. This population meets other requirements in that they have no other residence besides a primary nighttime residence and they lack financial resources or support networks to maintain other housing. Domestic violence services providers are part of the required consultation partners.

Domestic Violence History

	Total	Without Children	With Children and Adults	With Only Children	Unknown Household Type
Yes	172	104	68	0	0
No	315	283	32	0	0
Client Doesn't Know/Client Refused	0	0	0	0	0
Data Not Collected	15	12	3	0	0
Total	502	399	103	0	0

Persons Fleeing Domestic Violence

	Total	Without Children	With Children and Adults	With Only Children
Yes	69	20	49	0
No	95	78	17	0
Client Doesn't Know/Client Refused	0	0	0	0
Data Not Collected	8	6	2	0
Total	172	104	68	0

Source: 2020 SAGE HMIS Report Domestic Violence

Based on Sage HMIS data, 502 adults were served in 2020 within the homeless system. Of those, 34% (172) experienced domestic violence in their lifetime. Of the 172 victims currently seeking assistance, 69 (40%) were currently fleeing violence. Approximately 70% of the victims fleeing had children alongside them.

Data from the National Coalition Against Domestic Violence estimates that in Ohio 38% of Ohio women and 33% of Ohio men experience intimate partner physical violence, intimate partner rape and/or intimate partner stalking in their lifetimes. Nationwide, one in three women and one in four men have experienced some sort of physical violence by an intimate partner. In 2021, the Battered Women's Shelter (Hope and Healing Survivor Resources Center), CoC/ ESG-funded Subrecipient (providing support services, safety, and preventing domestic and sexual violence), reported providing emergency shelter to 826 adults and children. Long-term housing was provided to 162 adults and children. The Rapid Re-Housing program operated by BWS was at a 100% utilization during the 2021/2022 program year.

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

This population is defined by HUD in the Notice as being potentially homeless people or families including individuals or families whose homelessness can be prevented by providing supportive services or assistance serving those with the greatest risk of housing instability who do not fall under the preceding defined populations (those defined as homeless, at risk of homelessness or fleeing or attempting to flee domestic violence) and meet one of the following two criteria: FIRST they are households who have PREVIOUSLY been defined as homeless and are currently housed due to temporary or emergency assistance including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed and who need additional housing assistance or supportive services to avoid a return to homelessness or, SECOND, they meet the following definition of being at the greatest risk of housing instability meaning either, A, the household has an annual income of less than or equal to 30% of the area median income and is experiencing severe cost burden (i.e. paying more than 50% of monthly household income toward housing costs) OR B, the household has an annual income that is less than or equal to 50% of the area median income AND meets one of the following conditions of being at risk of homelessness including that they have moved because of economic reasons two or more times in the sixty days preceding their application for homeless assistance, or they are living in the home of another due to economic hardship, or that they have been notified in writing that they are at risk of losing their housing, or they live in a hotel or motel at their own expense, or they live in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or they live in a larger housing unit in which their resides more than one and a half persons per room or they are exiting publicly funded institutions or systems of care or otherwise live in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the City of Akron's Consolidated Plan.

In Akron, 408 households are currently housed in permanent supportive housing. An additional 42 households received assistance thru rapid rehousing. Without this housing and the services provided, there is a high likelihood these individuals and families would return to homelessness. Additionally, 150 households at risk of homelessness received tenant based rental assistance in 2021.

According to the most recent CHAS data, 8,690 renter households in Akron are earning less than 30% of AMI and paying more than 50% of monthly household incomes toward housing costs. Additionally, a total of 16,570 renter households have an annual income of less than 50% AMI and live in housing that has characteristics associated with instability and an increased risk of homelessness as defined in the City of Akron's 2020-2024 Consolidated Plan (also see charts on pages 11 and 12).

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):

The City of Akron is committed to the creation of more affordable rental housing and permanent supportive housing. The City continues to actively work with its partners to develop short and long-term solutions to address the needs of qualifying populations including persons experiencing homelessness in Akron. The City of Akron and the Continuum of Care are the recipients of state and federal resources that provide assistance to qualifying populations, including but not limited to shelter, supportive services, tenant based rental assistance, rapid rehousing and permanent supportive rental housing.

The City is also the annual recipient of the Emergency Shelter Grant Solutions Program. The City provides financial assistance to non-profit agencies that operate emergency shelters, transitional housing, and supportive services for homeless individuals and families. The goal of the ESG is to improve the quality of existing homeless shelters, make available additional shelters, and to assist in the provision of essential social services to the homeless person. The City is also an annual recipient of HOME Investment Partnership funds. The City partners with a local non-profit organization to provide short term tenant based rental assistance to families and individuals in need. The City also utilizes HOME funds for the renovation or construction of new affordable renter or owner-occupied housing units in the City of Akron. The City also receives State of Ohio Homeless Crisis Response funds. The City partners with local non-profits to provide rapid re-housing assistance and supportive services to individuals and families utilizing this funding.

The Akron / Barberton / Summit County Continuum of Care and partner agencies are annual recipients of Continuum of Care (Coc) funds. CoC funding provides financial assistance to non-profit agencies for: rapid re-housing, homeless prevention, HMIS, supportive services and permanent supportive housing for homeless individuals and families.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

There is an overall lack of affordable housing and there continues to be a need for affordable housing and permanent supportive housing along with more non-congregate shelter options. Additionally, numerous issues hinder establishing a more stable living situation for the unsheltered population including mental, physical, emotional and behavioral challenges, criminal backgrounds and substance abuse issues. Many need mental health or medical intervention and counselling to help with re-establishment into a more stable routine. Additionally, there is a lack of knowledge to many of the resources that are available. They do not know where to get information and if they do, travel is difficult.

Specifically addressing unmet needs of the existing homeless population, family homelessness continues to be a growing problem. Housing for families with children is usually full and there is a shortage of family units that are more than two bedrooms and affordable. Very few families are able to move on from permanent supportive housing (PSH) because there are no affordable housing options for them to move into. In general, families are spending more time waiting for shelter beds to become available and it is taking much longer to locate housing.

There is a shortage of PSH for singles as well. There is a very lengthy waiting list for all PSH projects for single adults. Access Inc., serving single women, continues to see a waiting list for shelter, even with the addition of a temporary hotel expansion program that began in December, 2022. This ESGP-COVID funded program will end September 30, 2023. The CoC lacks funding to continue this program. With the program ending, clients will place greater burden on an already vulnerable homeless system.

The local system is lacking shelter alternatives for single males as well as youth and LGBTQ populations. The need for accessible rooms and case management is increasing. The incidence of pervasive mental illness in shelters is also increasing. Unmet need for youth includes shelter beds and the need for affordable apartments with dorm like setups. In general, homeless transition age youth cannot find or afford housing.

At Risk of Homelessness as defined in 24 CFR 91.5

Again, a lack of affordable housing is the primary unmet need. Excessively cost burdened households remain at high risk of homelessness. According to the most recent Comprehensive Housing Affordability Strategy, a total of 18,970 renter households in the Akron MSA have a cost burden of greater than thirty percent. Of these, 10,355 have a cost burden of greater than fifty percent. 73% of all renter households earning 50% AMI or less are cost burdened or severely cost burdened. According to the City of Akron 2020-2024 Consolidated Plan an additional 9,995 owner households have a cost burden of greater than

thirty percent. A major contributor to homelessness is evictions. Recent data suggests that approximately 20% of renters in Summit County could be at risk for eviction. More than twenty percent of Akron's population lives in poverty and about seven families are evicted every day. In 2022, it is estimated that Akron had 300 evictions per month. For the year, this would be upward of 3,000 evictions.

Recent data for Ohio supplied by the National Low Income Housing Coalition estimates that, in the State of Ohio, for every 100 extremely low-income renter households there exists only 40 affordable units. In Akron, this would translate into a shortage of over 6,000 units of affordable housing for cost burdened renter households earning less than thirty percent AMI. The National Low-Income Housing Coalitions' most recent state housing needs report notes that there is a shortage of 254,545 housing units available to people at extremely low incomes in Ohio. In a poll taken for this plan, the development of affordable housing was the number one need requested by homeless providers.

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

Domestic violence victims fleeing an abusive home encounter many barriers to obtaining their own safe, stable housing, making these victims at high risk of homelessness. Domestic violence perpetrators enact various tactics of power and control to force the victim(s) to be dependent on them, trapping them in the abusive relationship, ranging from physical abuse and threats, mental, emotional, and financial abuse. Victims often face the decision of staying with an abuser (therefore perpetuating the cycle of violence and risking further abuse/injury) or becoming homeless.

Victims of domestic violence and their children are affected by housing instability when escaping an abusive environment. Persons leaving an abusive relationship often experience homelessness due to a financial dependency on the abuser. The National Network to End Domestic Violence reports that financial abuse is present in 99% of domestic violence cases and that survivors report that the ability to financially provide for themselves and their children is a common reason for staying with or returning to an abusive partner. It is difficult for survivors to achieve long-term self-sufficiency with stable, safe housing when they are mitigating the affects of abuse such as ruined credit scores, irregular work history, or legal issues stemming from abuse. This dependency is exacerbated by a lack of available affordable housing when they attempt to leave.

Most persons seeking assistance from domestic providers in Akron are low-to-moderate income adult female victims between the ages of 18-45 and their dependent children. However, agencies serve victims of domestic violence from all demographics (gender, age, race, sexual orientation, etc.). Domestic violence does not discriminate and can impact any gender, age, race, or socioeconomic status. The Ohio Attorney General's office reports that in 2022, a total of 4,537 domestic violence incidents reports were made in Summit County, of which 2,441 of those incidents were reported to the Akron Police Department.

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

Access to affordable housing is the greatest unmet need for populations qualified as “Other Populations” based on the qualifications in the HUD Notice and defined on page 12. More permanent supportive housing is necessary to assist those transitioning from homelessness to housing with the provision of essential services and assistance that they require.

Additionally, more tenant based rental assistance is necessary to keep severely cost-burdened households in their homes. Recent data suggests that approximately 20% of renters in Summit County could be at risk for eviction and that there is a shortage of over 6,000 units of affordable housing for cost burdened renter households earning less than thirty percent AMI.

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

The City has identified gaps within the current housing inventory including affordable housing for qualifying populations. The Comprehensive Housing Affordability Strategy (CHAS) reports housing problems in Akron including overcrowding, substandard housing and households impacted by severe cost burdens. There is a lack of accessible housing and a lack of housing that has services attached to it including mental health case management and housekeeping resources. A better integrated system of data sharing and housing locators is necessary for the use of all members of the COC to make sure people don't fall between the cracks. Upkeep is necessary in existing units and some units are uninhabitable.

There is a lack of affordable housing. The City continues to support and direct any of its available resources to the development of new, affordable rental units. The eviction rate in Akron is the highest in the state. More opportunities need to exist for affordable housing, homeownership and eviction prevention. There are insufficient beds available for women and for women with children facing immediate needs. Additionally, more resources need to be directed to transitioning the homeless population into more permanent, stable situations. More low-barrier shelter options for those uncomfortable with going to the faith-based shelter are needed, especially for single males. There is no interim placement for people transitioning from incarceration, rehab or mental health hospitalization.

The current shelter system does not accommodate those with severe mental illness very well. More space is necessary to separate families and single individuals. The two groups can have very different needs. There are also not enough supports in place for the severely mental ill that are experiencing homelessness. There is a sector of the population that is willing to come to shelter, but when in shelter they need additional space and support that can be lacking in a combined space. Additionally, there is an ongoing need for individuals trying to leave a domestic violence situation prior to an incident. There is not a system in place that addresses this the way the clients need it to.

The only youth shelter is Harmony House and youth generally do not want to go to the Haven. Often when families are in crisis they are put on a wait list for shelter so they're forced into unsafe or uncomfortable situations like staying with an acquaintance or in their car. When their crisis is not met with a solution right away, they find their own solution and it's a constant cycle because friends only allow them to stay so long. Youth should have access to transitional housing in their identified neighborhoods whenever possible.

There is a lack of transitional housing. There is lack of shelter for people with pets, lack of shelter for couples, lack of shelter for families with adult children, lack of shelter for disabled and medically fragile individuals. More housing is needed for intact homeless families, housing for homeless couples, housing for homeless multi-generational households and recovery housing for families.

More options are necessary for individuals to stay until permanent housing is available, something such as a hotel or transitional shelter. More than just a bed on the floor. Individuals need room and intensive case management to help them navigate the housing process.

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:

N/A

Identify priority needs for qualifying populations:

Akron, like most cities in the country, is experiencing extremely high and rapidly escalating housing costs placing a financial burden on low-income families/individuals. This, combined with high eviction rates, creates harmful instability for the qualified populations in Akron. It is difficult for members of qualified populations to find affordable housing of any kind in Akron. Priority needs include tenant based rental assistance to keep individuals and families from being evicted, more affordable housing units, more permanent supportive housing units and counsel for individuals and families going thru eviction.

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 of Akron referred to a number of data sources to determine the inventory and gaps in the city. This included but is not limited to: the Census, the City of Akron 2020-2024 Consolidated Plan, the Comprehensive Housing Affordability Strategy (CHAS), the Akron / Barberton / Summit County Continuum of Care Homeless Management Information System (HMIS) and the annual homeless point-in-time count data. City staff also heard from local

stakeholders during the consultation process about the priority gaps and needs throughout the state, including other entitlement areas.

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 of Akron will utilize \$5,335,558 in HOME American Rescue Plan Act (ARPA) funds to invest in eligible homeless programs by providing funding to local providers to carry out activities identified in the 2021 Amended Action Plan. The purpose of these programs is to partner with local nonprofit homeless providers/developers to proactively address the negative economic impacts that the pandemic has had on the homeless population. The City of Akron will work with nonprofits to invest in affordable housing projects that promote long term housing stability, provide tenant based rental assistance and legal counsel for those encountering evictions.

Additionally, the City of Akron will work with developers and homeless providers to pursue 9% Tax Credit, 4% Tax Credit/Tax-Exempt Bonds and Permanent Supportive Housing tax credits during the next 4 to 6 funding cycles. HOME-ARP funds will be used as gap financing and/or match for state tax credits or other funding opportunities. Continuum of Care funds may be pursued to provide management and supportive services in the new housing projects.

The City of Akron will issue a Notice of Funding Opportunity for grant opportunities. All of the applications will be reviewed and scored by the City. After receiving and reviewing the written application, the City may elect to have the application presented in person or ask for clarifications in writing.

Applicants shall not assume that any information shared with the City prior to this notice of Funding Opportunity (NOFO) will be considered in the evaluation process. The evaluation team may or may not have prior knowledge of any discussions and processes. Evaluation will be completed on only the information submitted in response to the NOFO unless a presentation for clarification is requested. Should this occur, all of these factors will be used to determine the outcome.

All awards will be structured as grants with performance milestones and reporting requirements. The award(s) may be granted to one or more applicants.

Describe whether the PJ will administer eligible activities directly:

The City of Akron will NOT administer eligible activities directly.

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:

N/A

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

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 750,000		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 750,000		
Development of Affordable Rental Housing	\$ 3,500,000		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 335,558	6.28 %	15%
Total HOME ARP Allocation	\$ 5,335,558		

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

Over 65%, of the HOME-ARP allocation will be dedicated to the development of affordable rental housing in the City of Akron. Approximately 14% of the allocation will be dedicated to Tenant Based Rental Assistance (TBRA) programming. An additional 14% will be allocated to supportive services that will include the right to free Counsel before a judge to those families/individuals facing an eviction. A small portion will be made available to the City of Akron for administration and planning functions.

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 of Akron reviewed existing shelter beds available, existing TBRA funding availability, State of Ohio Homeless Crisis Response Program funds, affordable and supportive housing opportunities and reviewed the gaps analysis for shelter utilization and a homeless street count. Additionally, several COVID Cares programs will no longer be providing assistance in the

community. The city also considered potential future LIHTC investments and feedback from Continuum of Care partner agencies. Based on all data, a determination was made that a significant lack of affordable decent rental units existed in our community.

The need for additional affordable housing was emphasized along with permanent supportive housing units to assist in the reduction of long-term shelter stays, unsheltered homelessness and to provide a safe and affordable place to recover or address substance abuse, mental illness and other disabling conditions. The City of Akron consulted with the CoC and local homeless providers in the development and implementation of HOME-ARP funding relating to the development of additional permanent supportive housing units in the community.

Akron continues to have a high eviction rate. The Fair Housing Contact Service hosted an Eviction Summit in 2022. During the Summit, the community identified several strategies to address Akron's longstanding and ongoing eviction crisis. The City of Akron is aware that existing supportive housing programs do not adequately address the high rate of evictions in Akron. Community members identified over 350 specific ways to lower Akron's eviction rate. Those were collated into thematic buckets and organized by how often they were mentioned. Based on housing eviction data, community feedback, comments made at the 2022 Eviction Summit and recommendations of Community Legal Aid and the Fair Housing Contact Service, the City of Akron is proposing to fund Right to Counsel for tenants facing evictions. Right to Counsel ensures the use and enforcement of other interventions such as rent assistance and eviction moratoria and addresses uneven power dynamics between landlords and tenants and furthermore addresses longstanding racial disparities. Akron tenants facing eviction would be given the opportunity to be represented by an attorney for free throughout their eviction proceedings.

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:

The City tentatively estimates that a total of 200 affordable rental units will be added to the current housing inventory using HOME-ARP funds. This number may vary due to ongoing escalating construction costs. The City also estimates that additional HOME funding from its annual entitlement allocation will be utilized in these projects. This will increase the number of affordable housing units produced. The HOME-ARP budget allows for tenant based rental assistance (TBRA). The City of Akron estimates approximately 100 households would benefit from expanded TBRA supportive services serving qualifying populations. Additionally, the City of Akron is requesting supportive services related to right to counsel. The City of Akron would provide Akron tenants facing eviction with the opportunity to be represented by an attorney for free throughout their eviction proceedings.

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:

The City of Akron estimates it can support the creation of 200 new affordable housing units by filling capital gaps and leveraging the Ohio Housing Finance Agency tax credit and bond programs (9% and 4%), state and national affordable housing trust funds and local HOME formula allocation funds. The City of Akron will work with local partners to leverage other financing tools to maximize unit production. Additionally, the City of Akron will seek to prioritize high quality supportive housing developments that can operate with fidelity to evidence-based practices and are adequately capitalized with sufficient operating and supportive services dollars to meet the needs of the tenants. The development of Permanent Supporting Housing affordable rental housing units will significantly impact gaps in housing opportunities. The addition of permanent supportive housing to the housing inventory will significantly impact on those facing homelessness as there is an opportunity for wrap-around services within the housing unit that will assist participants in achieving self-sufficiency.

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:
N/A

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:
N/A

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):

Enter narrative response here.

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):

Enter narrative response here.

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):

Enter narrative response here.

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):

Enter narrative response here.

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:

Eligibility will not be limited.

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:

N/A

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):

N/A

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***

N/A

- ***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.***

N/A

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

N/A

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

N/A

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

N/A

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

N/A