

# HOME-ARP ALLOCATION PLAN

#### **Abstract**

The State of Arkansas has been allocated HOME-ARP funds through the U.S. Department of Housing and Urban Development. HOME-ARP funds assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by helping to increase housing stability This plan outlines the State's intended uses of HOME-ARP funds to achieve these outcomes.

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# 1. Executive Summary

The American Rescue Plan of 2021 (ARP), also called the COVID-19 Stimulus Package, Pub.L. 117–2 (March 11, 2021) provides \$5 billion to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability across the country. These grant funds will be administered through HUD's HOME Investment Partnerships Program (HOME) and are known as HOME-ARP funds. Eligible HOME-ARP activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing, administration and planning, and nonprofit operating and capacity building assistance. A certain portion of HOME-ARP funds must assist people in HOME-ARP "qualifying populations," which include:

- Sheltered and unsheltered homeless populations, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a)); Those currently housed populations at risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42U.S.C. 113060(1));
- Those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking;
- Other families requiring services or housing assistance or to prevent homelessness

In September 2021, HUD announced that the State of Arkansas will receive \$37,547,010 in HOME-ARP funds. This supplemental funding was allocated by formula under the HOME entitlement program. To receive the HOME-ARP allocation, the Arkansas Development Finance Authority (ADFA) must develop a HOME-ARP Allocation Plan that will become part of the State's PY2021 HUD Annual Action Plan by substantial amendment. The Allocation Plan includes 1) an outline of the consultation and public participation processes undertaken, 2) an assessment of the needs of qualifying populations and gaps in local housing and services systems, and 3) planned uses of HOME-ARP funds for prioritized populations and eligible activities.

To ensure broad input into the HOME-ARP Allocation Plan from stakeholders and the public, the ADFA engaged in consultation with stakeholders and the public, including an online

survey, virtual consultation sessions, direct contact with HUD-required organizations that did not participate in a virtual session, a 16-day public comment period, and a public hearing.

The needs assessment and gap analysis identified the following needs and gaps that may be addressed using HOME-ARP funds:

- A 2019 Point in Time (PIT) count for the five CoCs in Arkansas, found a total of 1,302 sheltered homeless individuals and 1,415 unsheltered homeless individuals throughout the State for a total of 2,717 homeless individuals. (As explained in the demographic discussion on Homeless Individuals later in this Plan, the PIT count in 2019 is the last year that all COCs participated in both the sheltered and unsheltered counts.)
- According to data submitted by school districts to the U.S. Department of Education, in the 2019-2020 school year, an estimated 13,335 public school students in Arkansas experienced homelessness over the course of the year; this translates to 2% of all Arkansas youth between the ages of 5 and 19 experienced homelessness during this year
- Households earning between 0-30% AMI are more likely to pay more than 30% of their income towards housing expenses making them at risk for homelessness.
   Among all renters in Arkansas who are cost burdened at 30% income, 64% earn below 50% AMI (a total of 113,040 households).
- As reported in the data and community consultation, households earning between 0-30% AMI are more likely to experience at least one housing problem as defined by HUD, including overcrowding and poor housing conditions. In the following counties, more than 6% of renter-occupied housing units have two or more housing problems: Hot Spring (8.17%), Monroe (7.26%), Scott (6.58%), Van Buren (6.43%), Sevier (6.18%), and Columbia (6.12%).
- According to the Emergency Rental Assistance Program reporting required by the U.S. Department of the Treasury, Arkansas has approved over \$201 million in rental assistance payments. Between January 2021 and January 2022, 25,454 households in Arkansas received rental assistance.

 The Household Pulse Survey measures the percentage of adults in households not current on rent or mortgage where eviction or foreclosure in the next two months is either very likely or somewhat likely. On average between September 2020 and March 2022, about 49,000 households were facing eviction throughout the State.

To address these needs and gaps, the ADFA will utilize HOME-ARP funds for the development of non-congregate shelter, to fund supportive services, and to provide operating support to non-profit organizations.

## 2. Consultation

## A. Process

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

In developing this Allocation Plan, the State conducted a diverse outreach strategy to engage the community and stakeholders through three methods. An online survey was published in English and Spanish, a series of four virtual community meetings were held, and direct one-on-one outreach to stakeholders was conducted to collect specific information around needs of qualifying populations. At this time, the State also sought to establish collaborative relationships with service providers in the spirit of increasing coordination between the State's efforts and those of the service providers. This section summarizes the consultation efforts made by the State.

The State's HOME-ARP Community Needs Survey was open from March 25 to April 15, 2022. The survey was made available in English and Spanish and received a total of 131 responses. A summary of the results is attached as Appendix A. The survey explored issues of fair housing, housing affordability, and the needs of those experiencing homelessness, at risk of homelessness, and other vulnerable populations. When asked about the greatest housing needs, respondents selected production of new housing units (77.1%), services for people experiencing homelessness (75.6%), housing for special needs populations (73.3%), and expanding shelter opportunities (71.8%) as very important. When asking about priorities for services for those experiencing homelessness, those at risk of homelessness, and other vulnerable populations, respondents selected mental health services (79.4%), life skills training (74%), substance abuse treatment (68%), childcare (67.9%), and outreach services (67.2%) as very important. Written responses to an open-ended question asking about community needs for qualifying populations contained themes related to the need for more

affordable units, low barrier entry for housing options, and more shelter space, particularly for families, those fleeing domestic violence, youth, and those with mental health issues. Shelter needs of homeless veterans were also mentioned, including for senior veterans and those with mental health and substance abuse challenges.

The State also held a series of four community meetings to solicit input and consult with key stakeholders that serve and support the qualifying populations identified in the HOME-ARP guidance issued by HUD in September 2021. At these meetings, the State provided an overview of HOME-ARP, reviewed the eligible qualifying populations, discussed the eligible uses of funds identified within the guidance provided by HUD, and described the required components of the HOME-ARP allocation plan including the process and anticipated timeline for submitting the plan. During the sessions, the State solicited questions, comments, and feedback about the eligible uses of funds through an interactive dialogue. Notice of the meetings was posted to the State's website on March 25, 2022, and Invitations were sent to 436 stakeholders throughout the State. Registration was requested for attendance and the total number of registrants is listed below along with the total number of individuals in actual attendance. Overall themes in the meetings included a need for more units that are both affordable and safe as many areas of Arkansas have housing that is affordable but in poor condition, the need for low barrier entry housing, and the need for housing with wrap around supportive services.

Meeting Date	Meeting Topic	Registrants
April 4, 2022 12 pm CT	Homelessness and Special Needs	34
April 5, 2022 2 pm CT	Housing	34
April 28, 2022 5:30 pm CT	General Resident Perspectives	11
April 29, 2022 12 pm CT	Community Services	28

Finally, the State engaged stakeholders one-on-one to further explore the needs of those experiencing homelessness, those at risk of homelessness, and other vulnerable populations. Invitations for interviews were sent to 20 stakeholders and the overall themes from these conversations included the need for more affordable units and low barrier entry housing options. Stakeholders noted that without safe, decent units available to house individuals and

families, the services that already exist in communities fall short or being able to close the needs gaps for these vulnerable populations. Stakeholders also noted that older community members with behavioral, mental health, or substance use issues have a great need for housing options that can meet their needs for appropriate supportive services.

# B. Organizations Consulted

List the organizations consulted.

Agency/Organization	Type of Organization	If a Service Provider, Qualifying Population Served	Method of Consultation
7hills Homeless Center	Nonprofit	Homeless, At Risk of Homeless	Community Meeting; Stakeholder Interview, Online Survey Invitation
Arkansas Balance of State CoC	Continuum of Care	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Stakeholder Interview; Data Collection; Online Survey Invitation
Arkansas Coalition Against Domestic Violence	Nonprofit	Fleeing Domestic Violence, Homeless, At Risk of Homeless	Community Meeting; Stakeholder Interview; Online Survey Invitation
Arkansas Community Action Agencies Association (ACAAA)	Nonprofit	Vulnerable Populations	Stakeholder Interview; Online Survey Invitation
Arkansas Fair Housing Commission	Nonprofit	Vulnerable Populations with Fair Housing Concerns	Community Meeting; Stakeholder Interview; Online Survey Invitation
Arkansas Justice Reform Coalition	Nonprofit	Formerly Incarcerated, Homeless, At Risk of Homeless	Community Meeting; Online Survey Invitation
Arkansas River Valley Action Council (ARVAC), Inc.	Nonprofit	Homeless, At Risk of Homeless	Community Meeting; Stakeholder Interview; Online Survey Invitation
Arvest Bank	Financial Institution	NA	Community Meeting; Online Survey Invitation
Brayboy Safety Against Domestic Violence Crisis Center/Purple Butterfly Shelter	Nonprofit	Fleeing Domestic Violence, Homeless, At Risk of Homeless	Community Meeting; Online Survey Invitation
Center for Arkansas Legal Services	Nonprofit/Legal Services Provider	Vulnerable Populations with Fair Housing Concerns	Community Meeting; Online Survey Invitation
Central Arkansas Team Care for the Homeless (CATCH)	Continuum of Care	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Stakeholder Interview; Online Survey Invitation
City of Hot Springs	Local Government	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
City of Jonesboro	Local Government	NA	Community Meeting; Online Survey Invitation

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City of Little Rock	Local Government	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
Community Rescue Mission	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
Conway Housing Authority	Public Housing Authority	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
Crawford-Sebastian Community Development Council, Inc.	Nonprofit/Community Action Agency	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
Department of Veteran Affairs	Federal Government	Veterans, Homeless, At Risk of Homeless; People with Disabilities	Community Meeting; Online Survey Invitation
Economic Opportunity Agency of Washington County	Community Action Agency	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
Fayetteville Housing Authority	Public Housing Authority	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
HARK	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
HOPE Campus	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
Hope Found of Northeast Arkansas	Nonprofit	Fleeing domestic violence, sexual assault, human trafficking, elder abuse, dating violence, stalking, or other victimization by family or intimate partner violence	Data Collection; Online Survey Invitation
HouseAboutit Community and Economic Development Agency	Nonprofit/Community Action Agency	Vulnerable Populations	Community Meeting; Online Survey Invitation
Housing Authority of the City of Hot Springs	Public Housing Authority	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
Law Offices of Bud Cummins	Legal Services Provider	NA	Community Meeting; Online Survey Invitation
M R Designs	Architectural Design	NA	Community Meeting; Online Survey Invitation
Margie's Haven House	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
Northwest Arkansas CoC	Continuum of Care	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Stakeholder Interview; Data Collection; Online Survey Invitation

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Northwest Arkansas Continuum of Care	Continuum of Care	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
Office of Rep Hill	Elected Official	NA	Community Meeting; Online Survey Invitation
Old Fort CoC	Continuum of Care	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Stakeholder Interview; Online Survey Invitation
Open Arms Shelter	Nonprofit	Fleeing Domestic Violence, Children, Homeless, At Risk of Homeless, Vulnerable Populations	Stakeholder Interview; Online Survey Invitation
Our House	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations, People with Disabilities	Community Meeting; Data Collection; Online Survey Invitation
Ozark Opportunities, Inc.	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
Partners Against Trafficking Humans	Nonprofit	Fleeing domestic violence, sexual assault, human trafficking, dating violence, stalking, or other victimization by family or intimate partner violence	Community Meeting, Online Survey Invitation; Stakeholder Interview
Partners for Better Housing	Nonprofit/Housing Developer	Homeless, At Risk of Homeless	Community Meeting; Online Survey Invitation
PEACE at Home	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Stakeholder Interview; Online Survey Invitation
Projects for Assistance in Transition from Homelessness (PATH)	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Stakeholder Interview; Online Survey Invitation
Pruitt Agency/Arcare	Healthcare Provider	Vulnerable Populations	Community Meeting; Online Survey Invitation
Restoration Village	Nonprofit	Women and Children, Homeless, At Risk of Homeless	Community Meeting; Online Survey Invitation
Restore Hope	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting;Online Survey Invitation
Rising Sun #11 Pha Masons/ Pha Sphinx Temple #25 Shriners	Fraternal Organization	NA	Community Meeting; Online Survey Invitation
Samaritan Community Center	Nonprofit	Vulnerable Populations	Community Meeting; Online Survey Invitation
Second Chance DV SA Shelter	Nonprofit	Fleeing Domestic Violence, Homeless, At Risk of Homeless	Community Meeting; Online Survey Invitation
Southeast Arkansas CoC	Continuum of Care	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Stakeholder Interview

Southeast Arkansas Community Action Corporation	Nonprofit/Community Action Agency	Vulnerable Populations	Community Meeting; Online Survey Invitation
Southwest Church and The HUB of Jonesboro	Faith Based Organization	NA	Community Meeting; Online Survey Invitation
St. Francis House, Inc.	Nonprofit	Veterans, Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Stakeholder Interview
Sunbelt Development Corp	Housing Developer	NA	Community Meeting; Online Survey Invitation
Supportive Services for Veteran Families	Nonprofit	Veterans, Homeless, At Risk of Homeless	Community Meeting; Online Survey Invitation
The McVay Firm PLLC	Legal Services Provider	NA	Community Meeting; Online Survey Invitation
United Way of the Ouachitas	Nonprofit	Vulnerable Populations	Community Meeting; Online Survey Invitation
Universal Housing Development Corporation	Nonprofit/Housing Developer	Homeless, At Risk of Homeless	Community Meeting; Online Survey Invitation
Upward Housing Group	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Community Meeting; Online Survey Invitation
Veterans Healthcare System of the Ozarks	Healthcare Provider	Veterans	Community Meeting; Online Survey Invitation
White River Women's Shelter, Inc.	Nonprofit	Fleeing domestic violence, sexual assault, human trafficking, elder abuse, dating violence, stalking, or other victimization by family or intimate partner violence	Community Meeting; Online Survey Invitation
Wolfe Street Foundation	Nonprofit	Homeless, At Risk of Homeless, Vulnerable Populations	Stakeholder Interview; Online Survey Invitation
Women and Children First	Nonprofit	Fleeing Domestic Violence, Homeless, At Risk of Homeless, People with Disabilities	Community Meeting; Stakeholder Interview

# C. Summary of Feedback Received

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

Largely the public and stakeholders agreed that the needs lie primarily in accessing more affordable housing units and ensuring that those experiencing homelessness have the shelter and services needed to support their needs. See more detailed discussion of consultation in Section 2.A.

# 3. Public Participation

#### A. Process

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.

The state began its public participation process with a Community Needs Survey distributed throughout the state and during community engagement public hearings. This survey was utilized to gather information from respondents on their views on the specific needs and priorities within their communities. After the completion of the Community Needs Survey process, survey data was evaluated, and this information was utilized as a starting point for discussion with various individuals, groups, and organizations during formal and informal focus group sessions held throughout the state. This wide variety of contacts included: local officials, Planning and Development Districts, members of substance abuse and mental health committee members, COCs, housing advocates, homeless services advocates, and other members of the public. The State of Arkansas conducted four meetings on April 4, 5, 28, and 29, 2022. The public hearings included presentations to explain the HOME-ARP Allocation Plan and an opportunity for citizen comments. The meetings were held virtually via Zoom.

Public meeting notices were posted on the ADFA website and distributed directly to local officials; developers; non-profit organizations; Planning and Development Districts; and the Continuum of Cares throughout the state.

Once drafted, the plan was released for a 16-day comment period beginning August 21, 2022. A copy of the Draft was posted on the ADFA and State of Arkansas website.

## Date of Public Notice:

The notice announcing the public comment period and public hearing was published on August 21, 2022. See attached.

#### Public Comment Period:

A 16-day public comment period during which the draft was available on ADFA's website began on August 21, 2022 and ended at 4:30pm on September 6, 2022.

# Date of Public Hearing:

A public hearing was held in-person and virtually on August 29, 2022.

# B. Efforts to Broaden Public Participation

Describe efforts to broaden public participation.

Efforts to broaden community participation included holding public focus group meetings, early in the planning process via Zoom to make them accessible to a wider range of people. Accommodations are made for people with disabilities upon request. ADFA its website and press releases to publicize meetings. The Community Needs Survey was available in English and Spanish.

#### C. Comments and Recommendations Received

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

Comments received through the public participation process are summarized below.

- Written comments were received regarding:
  - o additional available data for point in time counts for people experiencing homelessness
  - support for the inclusion of rental development as an activity under the State's HOME-ARP Allocation Plan.
- Comments received at the public hearing on August 29, 2022, include:
  - support for supportive services, non-congregate shelter, and operational and capacity building funding
  - support for including rental development as an activity under the State's HOME-ARP Allocation Plan
  - o comments regarding how the qualified population is determined

## D. Comments or Recommendations Not Accepted

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

All comments were considered in the finalization of this HOME-ARP Allocation Plan. The State chose not to modify its activity selection to include rental housing development. While additional affordable housing is a need in the state, other sources exist to address this need.

Through the State's Low Income Housing Tax Credit, HOME, and National Housing Trust Fund programs, 1,391 units have been approved for funding between 2020 and 2022. An additional 262 units are in the pipeline through the Low-Income Housing Tax Credit 4% program. In contrast, fewer resources are available to fund non-congregate shelter and supportive services for qualifying populations. The State has chosen to take advantage of the opportunity presented by the HOME-ARP program to address these unmet needs.

# 4. Needs Assessment and Gaps Analysis

# A. Size and Demographic Composition of Qualifying Populations

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

The needs assessment and gap analysis must evaluate the "demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations."<sup>1</sup> The qualifying populations are as followed:

- Homeless
- At risk of Homelessness
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking
- Veterans and Families that include a Veteran Family Member
- Other Populations (Other Families Requiring Services or Housing Assistance to Prevent Homelessness and Households at Greatest Risk of Instability)

There are several demographic overlaps of these discreet qualifying population categories as defined in the HOME ARP Guidance. For this needs assessment section, two primary categories will be used, Homeless and At Risk of Homeless. Within these large categories, needs and gaps of other qualifying populations will be described.

## Homeless Individuals, as defined in 24 CFR 91.5

The State of Arkansas has five Continuums of Care (COCs). They are AR-500 (CATCH), AR-501 (NWA), AR-503 (Balance of State), AR-505 (Southeast AR CoC), AR-508 (Old Fort). Based on the 2019 Point in Time (PIT) count for people experiencing homelessness, there were a total of 1,302

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<sup>&</sup>lt;sup>1</sup> HOME ARP Guidance.

sheltered individuals and 1,415 unsheltered individuals reported to HUD by the five COCs for a total of 2,717 reported as homeless (unsheltered, sheltered-emergency shelter, and sheltered-transitional housing).

The 2020 PIT Count reported 1,273 unsheltered individuals and 1,093 sheltered individuals for a total of 2,366 homeless individuals (unsheltered, sheltered-emergency shelter, and sheltered-transitional housing). Note, however, AR-508 (Old Fort) did not participate.

For the 2021 PIT Count AR-500 (CATCH), AR-501 (NWA), and AR-505 (Southeast AR CoC) conducted a sheltered count only. AR-503 (Balance of State) and AR-508 (Old Fort) did sheltered and unsheltered counts. The unsheltered count was 669 individuals, and the sheltered count was 1,470 for a total of 2,139 homeless individuals (unsheltered, sheltered-emergency shelter, and sheltered-transitional housing).

Complete 2022 PIT Count data has not yet been posted.

Using 2019 data, which was the last year that all five COCs participated in both sheltered and unsheltered PIT counts, the charts below summarize overall homeless demographics. Of note in these counts is that nearly 11 percent of homeless individuals were children. Additionally, more than 33% were Black/African American while only 15.5% of the State population in 2019 was Black/African American, illustrating that Black/African American individuals represent a disproportionate share of the homeless population.

#### Arkansas Overall Homeless PIT Count by Age, 2019

TOTAL OVERALL HOMELESS	Under 18	Age 18 to 24	Over 24
2,717	303	317	2,097

#### Arkansas Overall Homeless PIT Count by Gender, 2019

TOTAL OVERALL HOMELESS	Male	Age 18 to 24	Transgender	Gender Non-Conforming
2,717	1,688	1,022	4	3

## Arkansas Overall Homeless PIT Count by Race/Ethnicity, 2019

Race/Ethnicity	Total Overall Count (Total for State: 2,717)	Percentage of Total
White	1,651	60.7%
Black or African American	902	33.2%
Asian	4	.1%
American Indian or Alaska Native	36	1.3%
Native Hawaiian or Other Pacific Islander	24	.8%
Multiple Races	100	3.6%
Hispanic	60	2.2%

While COCs have faced limitations in collecting the PIT homeless count data since 2019 due to the COVID-19 pandemic, the above data offers a starting point for understanding the demographic composition of homeless individuals throughout the State. Additional data sources (discussed below) offer a more complete picture of Arkansas homeless demographic composition, especially in terms of homeless families and youth.

#### Homeless Families and Youth

The Arkansas Homeless Student Count as reported by School Districts on a quarterly basis. Homeless service providers recommended the use of this report as a more accurate reflection of the actual numbers of homeless families throughout the state.<sup>2</sup>

According to data submitted by school districts to the U.S. Department of Education, in the 2019-2020 school year, an estimated 13,335 public school students in Arkansas experienced

<sup>&</sup>lt;sup>2</sup> Data collection methods and homeless definitions for the U.S. Department of Education homeless student count differs from the HUD PIT count.

homelessness over the course of the year; this translates to 2% of all Arkansas youth between the ages of 5 and 19 experienced homelessness during this year.<sup>3 4</sup>

Our House, a central Arkansas based provider of shelter and services to those experiencing homelessness and at risk of homelessness, reported that 360 people requested housing in October 2021. Children represented over 1/3 of those in need of housing during that period.

Our House, Housing Requests, October 2021			
Total Adults	237		
Total Children	123		
Total Families	49		
Total Single Adults	181		
Total People	360		

# At Risk of Homelessness, as defined in 24 CFR 91.5

As defined in the HOME ARP Guidance, households at risk of homelessness are those with incomes below 30% AMI that do not have resources or family, friend, or faith-based support networks to prevent homelessness, and:

- 1. Has moved because of economic reasons two or more times during the 60 days,
- 2. Lives in the home of another because of economic hardship,
- 3. Has received a 21-day eviction notice,
- 4. Lives in a hotel or motel, which is not paid for with assistance from a charitable organization or government,
- 5. Lives in overcrowded conditions as defined by HUD, OR
- 6. Is exiting a publicly funded institution or system of care.

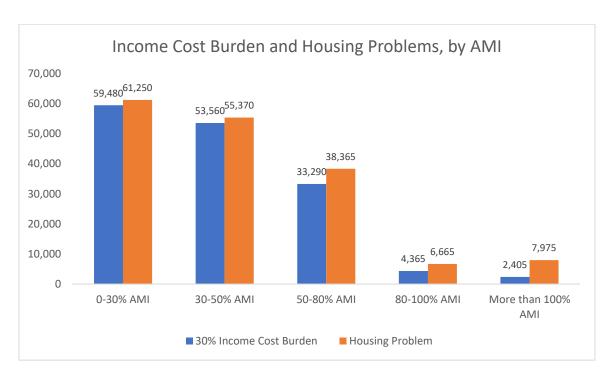
Cost burden, which is the ratio of housing costs to household income, is an indication of housing need, and the need for reduced rental costs. For renters, housing cost is gross rent (contract rent

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<sup>&</sup>lt;sup>3</sup> National Center for Homeless Education using the U.S. Department of Education's EDFacts Initiative.

<sup>&</sup>lt;sup>4</sup> American Community Survey 2019.

plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes. Renter households who pay more than 30% of their income for rent and utilities are considered cost burdened. In Arkansas, households earning between 0-30% AMI are more likely to pay more than 30% of their income towards housing expenses. <sup>5</sup> Among all renters in Arkansas who are cost burdened at 30% income, 64% earn below 50% AMI (a total of 113,040 households).



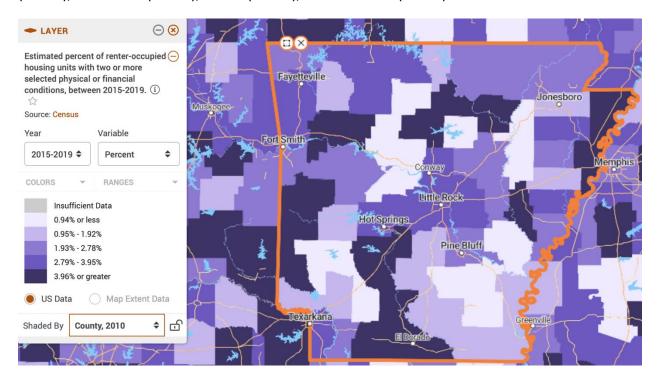
Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2014-2018.

Similarly, households earning between 0-30% AMI are more likely to experience at least one housing problem as defined by HUD.<sup>6</sup> In the following counties, more than 6% of renter-occupied

<sup>&</sup>lt;sup>5</sup> Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

<sup>&</sup>lt;sup>6</sup> The four housing problems are: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%

housing units have two or more housing problems: Hot Spring (8.17%), Monroe (7.26%), Scott (6.58%), Van Buren (6.43%), Sevier (6.18%), and Columbia (6.12%).



Source: PolicyMap.

#### COVID-19 Related Emergency Rental Assistance

Many of the eligibility requirements for the U.S. Department of Treasury's Emergency Rental Assistance Programs overlap with HOME APR eligibility requirements, including:

- At risk of homelessness or experiencing housing instability (e.g. past due notice, non-payment of rent, or eviction notice) and
- A household income less than 80% AMI.<sup>7</sup>

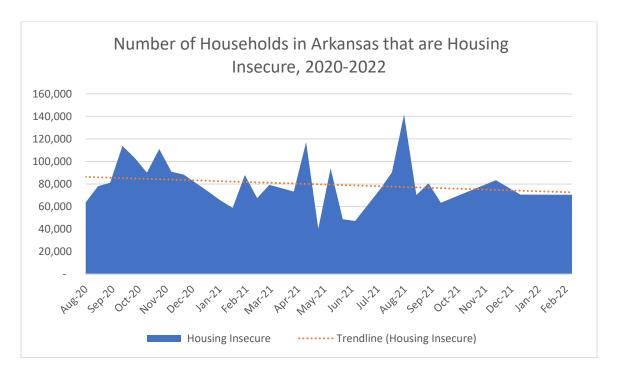
Data from the Arkansas Emergency Rental Assistance Program can help quantify those individuals and households in Arkansas that are housing insecure. According to the Emergency Rental Assistance Program reporting required by the U.S. Department of the Treasury, Arkansas has approved over \$201 million in payments.

<sup>&</sup>lt;sup>7</sup> While 80% AMI is the upper limit of assistance, many state and local ERA programs have developed systems to prioritize assistance for households earning 30% AMI.

- Between January 2021 and January 2022, 25,454 households in Arkansas received rental assistance.
- The average amount of assistance was just under \$7,900 per household.8

## Housing Insecurity and Eviction

Additionally, data collected in the online Household Pulse Survey, which measured housing insecurity throughout the COVID-19 pandemic found that household experiencing housing insecurity<sup>9</sup> in Arkansas was relatively stable between August 2020 to February 2022.



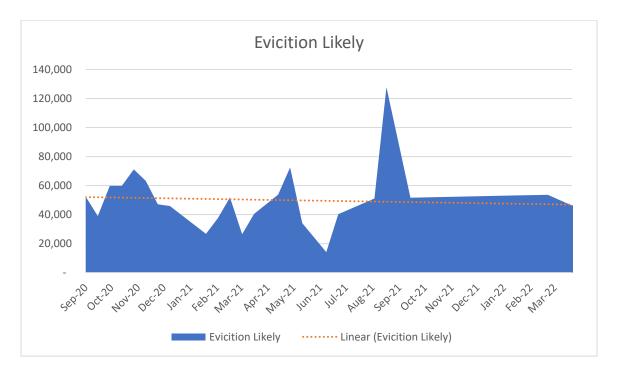
Source: Household Pulse Survey, Housing Insecurity (Missed Payment and Low Confidence).

<sup>&</sup>lt;sup>8</sup> Emergency Rental Assistance monthly compliance report data: <a href="https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program/reporting">https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments/emergency-rental-assistance-program/reporting</a>.

<sup>&</sup>lt;sup>9</sup>Housing Insecurity as defined by the Household Pulse Survey includes households that have missed the last months' rent or mortgage payment, or who have slight or no confidence that their household can pay next month's rent on time.

While the number of households throughout Arkansas experiencing housing insecurity has remained stable throughout this time, this data helps establish a baseline data point of around 82,000 households in Arkansas experiencing housing insecurity between 2020 and 2022.

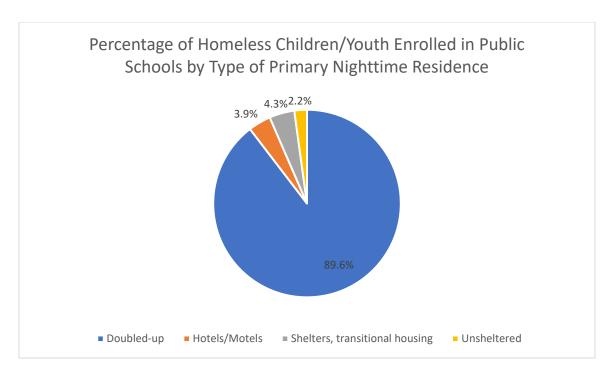
The Household Pulse Survey also measures the percentage of adults in households not current on rent or mortgage where eviction or foreclosure in the next two months is either very likely or somewhat likely. The graph below details the households in Arkansas reporting that eviction or foreclosure was likely between September 2020 and March 2022. While the trend of likely evictions or foreclosures has decreased since September 2020, on average, about 49,000 households are facing eviction throughout the State.



Source: Household Pulse Survey, Likelihood of Eviction or Foreclosure.

#### Students At-Risk of Homelessness

During consultation meetings with homeless stakeholders, several mentioned the value and accuracy of using the U.S. Department of Education's Homeless Student Count to better understand the real housing need of homeless children and youth throughout the State. According to data submitted by school districts to the U.S. Department of Education, in the 2019-2020 school year, most homeless students (89.6%) were doubled-up (living with another family).



Source: National Center for Homeless Education using the U.S. Department of Education's EDFacts Initiative.

Note: Unsheltered includes cars, parks, campgrounds, temporary trailer, or abandoned building.

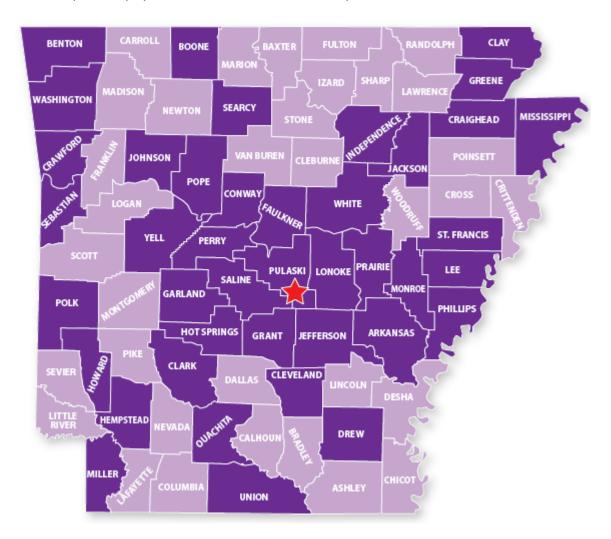
This is consistent with information provided by Our House, an organization based in Little Rock, AR that provides shelter, homelessness prevention, mental health assistance, a career center, and children's programs. In October 2021, Our House conducted a housing inquiry survey of all individuals seeking housing with its organization. A total of 360 people sought assistance, including 49 families and 181 single adults. When asked where they stayed the previous night, about 31% of families reported staying with family or friends in contrast to 23% of single adults reporting the same. Almost 30% of single adults reported spending the previous night unsheltered on the street or in a vehicle as compared to 12% of families.

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

HOME ARP Guidance specifically identifies individuals "Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking" as a specific qualifying population eligible to receive assistance. The 2019 PIT identified 318 homeless victims of domestic violence, 92 who were unsheltered. The growing need for victims to seek safety is better understood when looking at the increase of domestic violence in Arkansas in recent years. Arkansas Crime Information Center (ACIC) reported an 83% increase in domestic violence-related

homicides between 2019 to 2020. In a 2017 study on homicides by the Violence Policy Center, Arkansas reportedly ranked third nationally in the number of women killed by men.

Data from Women and Children First (WCF), a Little Rock based provider that serves victims from across the state, shows that shelter and service needs are not isolated to specific regions of the state. The map below shows in dark purple the counties that WCF alone has served through its programs. WCF reports that 37.3% of Arkansas women and 35.6% of Arkansas men experience intimate partner physical violence and/or intimate partner sexual violence in their lifetimes.



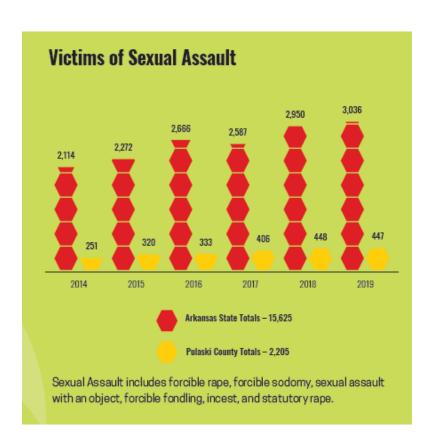
Women fleeing domestic violence are also likely to be entering poverty. Data of WFC reported that nearly 87% of victims seeking WCF emergency shelter were unemployed and/or made less than \$10,000 annually.

Children exposed to domestic violence may suffer both short-term and long-term effects, both behaviorally and developmentally. They are 6 times more likely to commit suicide, 50 times more

likely to abuse drugs or alcohol, and four-time more likely to commit a violent crime. 76.2% of children ended up becoming perpetrators as adults. WCF reported that in 2021, 470 children stayed in their shelter representing half of their shelter population

The State consulted with Hope Found of Northeast Arkansas during its community consultation. Hope Found educates the community and coordinates services for victims and survivors of human trafficking. They reported that from 2018 to present, they have served 50 clients. Of the 50 clients served, 47 were female and 3 were male.

WCF reported in its 2019 Campaign of Courage report that victims of sexual assault have also been on the rise in recent years with over 3,000 incidents of sexual assault in 2019.



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 HOME-ARP Notice

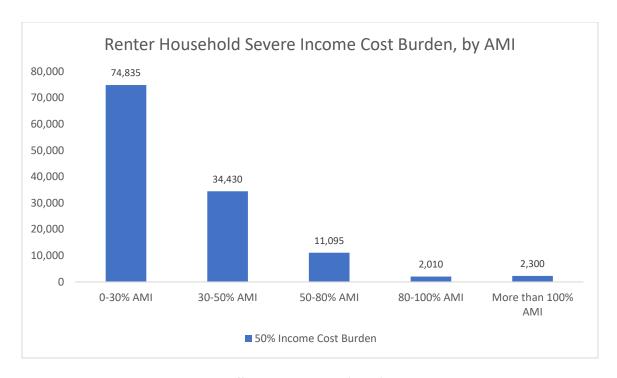
The HOME-ARP notice defines families "Requiring Services or Housing Assistance to Prevent Homelessness" as households (i.e., individuals and families) who have previously been qualified as "homeless" as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial 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.

The HOME-ARP notice defines "Other Populations at Greatest Risk of Housing Instability" in two ways. The first definition includes those with annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e. is paying more than 50% of monthly income on housing costs.) In Arkansas, there are 74,835 extremely low income and severely cost burdened households, which places them at imminent risk of becoming homeless.

The second definition is that the household has an annual income that is less than or equal to 50% of the area median income, as determined by HUD, and meets one of the conditions of "At risk of homelessness."

In Arkansas, there are 109,265 renter households earning between 0-50% AMI and are severely cost burdened or paying more than 50% of their income towards housing expenses. <sup>10</sup>

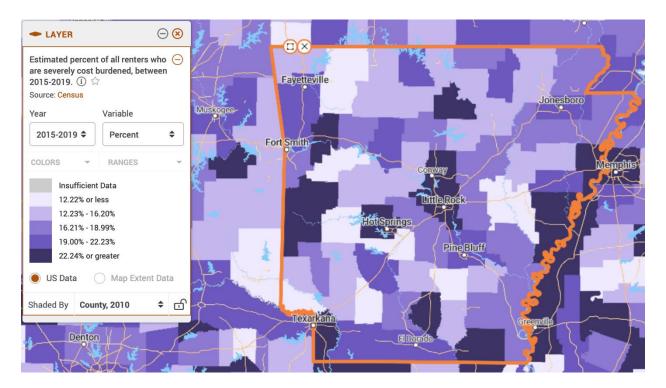
<sup>&</sup>lt;sup>10</sup> Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.



Source: HUD Comprehensive Housing Affordability Strategy (CHAS) 2014-2018.

The below map shows the geographic distribution of the estimated percent of all renters who are severely cost burdened.<sup>11</sup> The following counties have over 25% of *all* renters experiencing an extreme cost burden: Lee (28.16%), Polk (27.16%), Franklin (26.07%), Stone (25.45%), and Ashley (25.41%).

<sup>&</sup>lt;sup>11</sup> Severe Cost Burden: renter households for whom gross rent is 50% or more of household income.



Source: PolicyMap.

HOME ARP Guidance specifically identifies "Veterans and Families that include a Veteran Family Member" as another eligible population under HOME-ARP.

# B. Current Resources Available to Assist Qualifying Populations

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).

#### Congregate and Non-Congregate Shelter Units

As indicated in the 2020 HIC (Housing Inventory Count), Arkansas' homeless system only had 3,216 year-round shelter beds for people experiencing homelessness: 1,184 of these beds are described as "family beds" and 588 are veteran beds. Further the state has shelters across the state including some dedicated to those fleeing domestic violence and sex trafficking, however, all the shelters consulted noted that they are always at maximum capacity and shelter services in rural areas are especially difficult to access.

## **Supportive Services**

Arkansas is a large and rural state, where supportive services are inconsistent across the state. According to the Consolidated Plan, "State will address homelessness prevention and rapid rehousing through its goal to increase the availability and affordability of supportive services offered to homeless families and individuals by providing Emergency Solutions Grant (ESG) funds to projects that focus on the prevention of homelessness, such as averting eviction, foreclosure, and /or utility disconnection, as well as paying deposits and first month's rent." 12

## Tenant Based Rental Assistance

In Arkansas, there are over 140 agencies managing over 20,000 Tenant-Based vouchers and 153 Veterans Affairs Supportive Housing Vouchers.

## Affordable and Permanent Supportive Rental Housing

According to the 2020 HIC, there are 293 permanent supportive housing beds throughout the state. Further, ADFA has financed 5,500 Low-Income Units over the last five-years with an additional 1,391 units approved for funding between 2020 and 2022 through its Low-Income Housing Tax Credit (9%), HOME, and National Housing Trust Fund programs. An additional 262 units are in the pipeline through the Low-Income Housing Tax Credit 4% program.

# C. Unmet Housing and Service Needs of Qualifying Populations

Describe the unmet housing and service needs of qualifying populations.

## Homeless Populations, as defined in 24 CFR 91.5.

A 2019 Point in Time Count for the five CoCs in Arkansas, found a total of 1,302 sheltered homeless individuals and 1,415 unsheltered homeless individuals throughout the State for a total of 2,717 homeless individuals. As explained in the demographic discussion on Homeless Individuals, the PIT count in 2019 is the last year that all COCs participated in both the sheltered and unsheltered counts. During this same year, the Housing Inventory Count for Arkansas reported 1,917 total year-round bed for emergency housing, transitional housing, and supportive

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<sup>&</sup>lt;sup>12</sup> 2020-2024 Consolidated Plan.

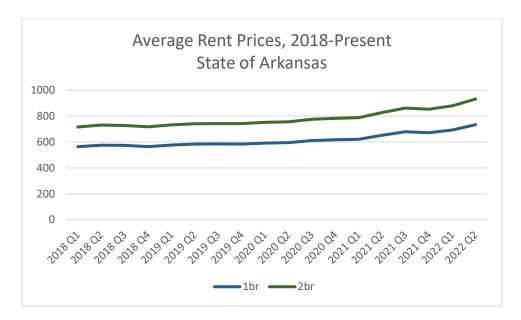
housing. While some beds are reserved for specific populations, this represents a net shortage of 800 beds. Additionally, in the 2019-2020 school year, an estimated 13,335 public school students in Arkansas experienced homelessness over the course of the year; just over 2% of these homeless public-school students are unhoused.

Our House, a Central Arkansas provider of shelter and services to those at risk of homelessness and those experiencing homelessness, reports that the need for shelter of those experiencing homelessness always surpasses the organization's ability to meet the need. For example, in October 2021, 360 individuals sought shelter while Our House is equipped to provide shelter to only 80 individuals through its dormitory style housing and to just 13 families through its family house. In October 2021, 49 families requested assistance. In that month, Our House was able to serve 160 individuals with only 85 individuals exiting housing, which means over 200 individuals were not served. The average length of stay for individuals is 21 days and for families is 129 days.

#### At Risk of Homelessness, as defined in 24 CFR 91.5.

Cost burden and extreme cost burden are the most common housing problems for Arkansas households earning less than 30% AMI. Among all renters in Arkansas who are cost burden, 64% earn below 50% AMI: 59,489 households under 30% AMI and 53,560 households between 30 and 50% AMI.

As incomes for many renters stay stagnant, costs of rents have been steadily increasing. Rental prices have been increasing since 2018 with sharper increases over the last two years. According to Apartment List, an online data source for rent and vacancy information nationally, the current median cost of a 1-bedroom unit in Arkansas is \$746, a \$154 increase since first quarter 2020, and the current median cost of a 2-bedroom unit is \$947, a \$195 increase since first quarter 2020. See graphic illustration below. These rents are statewide averages and urban markets will experience higher rents than rural areas. As rents increase, renters will spend increasingly higher percentages of their income on housing costs, which will further deepen concerns of housing instability.



Source: Apartment List Rent Estimate Data, August 2022

According to data submitted by school districts to the U.S. Department of Education, in the 2019-2020 school year, an estimated 13,335 public school students in Arkansas experienced homelessness over the course of the year. <sup>13</sup> <sup>14</sup> The vast majority of these students (89.6%) were doubled-up. Additionally, the Household Pulse Survey found around 80,000 households in Arkansas experiencing housing insecurity, and over 40,000 households believed that eviction or foreclosure in the next two months is either very likely or somewhat likely, between 2020 and 2022.

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

The 2019 Arkansas PIT identified 318 homeless victims of domestic violence, 92 who were unsheltered. Domestic violence or human trafficking survivors often lack easy access to short-term shelter and quick access to medical and mental health and other services.

Those fleeing domestic violence who use intervention services (e.g., counseling, information services, human resources, or employment assistance programs), and other workplace support services have a much better positive outcome, including a more positive outlook, greater drive

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<sup>&</sup>lt;sup>13</sup> National Center for Homeless Education using the U.S. Department of Education's EDFacts Initiative.

<sup>&</sup>lt;sup>14</sup> American Community Survey 2019.

to achieve their goals, better mental health, stronger workplace performance, and lower rates of absenteeism. All stakeholders we consulted indicated a greater need for service funding for those fleeing domestic violence and, importantly, a need for the services to be more easily accessible to those in need. Services that are scattered and require transportation or multiple stops can mean that those services are more difficult or even impossible for those fleeing to use them.

Additionally, WFC reported that over 80% of clients using WCF services have at least one unmet legal need. The client's legal needs range from obtaining Orders of Protection, child custody, support, and other family law issues, to housing law issues, consumer protection issues, and the need for assistance in obtaining public benefits, such as ARKids' health insurance for minor children.

Further, the programs and needs of children experiencing domestic violence have increased with the rising incidents of violence in families making their needs a heightened priority. Children need an environment with programs to address the trauma they have experienced.

With respect to those fleeing sex trafficking, stakeholders reported that these populations tend to be immigrants and are often in need of legal services.

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 HOME-ARP Notice

Extremely low income and severely cost burdened households are those with housing expenses greater than 50% of their income and earning less than 30% AMI. In Arkansas, there are 109,265 renter households earning between 0-50% AMI that are severely cost burdened or paying more than 50% of their income towards housing expenses.<sup>15</sup>

The issues already discussed in the previous sections for those at risk of homelessness, including cost burden, apply equally to those facing housing instability.

<sup>&</sup>lt;sup>15</sup> Cost burden is the ratio of housing costs to household income. For renters, housing cost is gross rent (contract rent plus utilities). For owners, housing cost is "select monthly owner costs," which includes mortgage payment, utilities, association fees, insurance, and real estate taxes.

# D. Gaps within Current Shelter and Housing Inventory and Service Delivery Systems

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

As described throughout this Plan, the consultation with residents and stakeholders reveals a gap in affordable units and the availability of services for people experiencing homelessness and at risk of homelessness. The State has a pipeline of affordable housing units that will assist in addressing the need for more affordable housing, but service providers indicate a drain on resources to provide shelter and services to those who request it daily. Shelter and services to support those experiencing homelessness and those at risk of homelessness or housing instability are most lacking in the community.

# E. Additional Characteristics Associated with Instability and Increased Risk of Homelessness

Optional: 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.

The State does not plan to formally adopt additional definitions of "other populations," however, a look at additional characteristics that can help clarify the stressors on those facing housing instability in Arkansas is useful. The high-cost burden is a housing characteristic strongly linked with instability and an increased risk of homelessness. The federal minimum wage is \$7.25/hour. The current state minimum wage is \$11.00/hour. Massachusetts Institute of Technology, Department of Urban Studies and Planning Living Wage Calculator reported the State of Arkansas living wage for an individual is \$15.55. A single parent with three children would need to earn at least \$49.31 per hour to make a livable wage. Two working parents with three children in Little Rock would need to earn at least \$25.14 each per hour to sustain a livable wage.

# F. Identify Priority Needs for Qualifying Populations

Identify priority needs for qualifying populations.

The following priority needs have been identified for qualifying populations:

- Shelters for families, those fleeing domestic violence, those with mental health and substance abuse challenges
- Services for vulnerable populations, including mental health, life skills, substance abuse treatment
- Affordable housing units
- Low barrier entry housing options
- Housing options for seniors with behavioral, mental health, and substance abuse challenges
- Diversion programs to prevent homelessness
- Supportive housing

# G. Determination of Level of Need and Gaps in Shelter and Housing Inventory and Service Delivery Systems

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.

Determination of level of need and gaps in shelter and housing inventory and service delivery was determined through an analysis of data and series of community outreach efforts, including an online survey and stakeholder interviews. The data presented in this Allocation Plan is a compilation of data collected from Census, ACS, CHAS, PIT count, data from organizations on the populations served through their programs, and the current Consolidated Plan. All the sources have various methodologies and went through extensive public consultation process including multiple public hearings. Stakeholders consulted to assess need and gaps included the public, the COC, homeless service providers, veterans' groups, domestic violence agencies, the public housing agency and other public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

# 5. HOME-ARP Activities

# A. Method(s) of Selection

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

HOME-ARP in a new one-time funding program authorized by the American Recovery Plan Act of 2021. HOME-ARP program requirements do not mirror the requirements of the HOME Investment Partnership Program (HOME program) and potential applicants should not rely on knowledge of the HOME program when contemplating or applying for HOME-ARP funding. Applicants are advised to review HOME-ARP Notice <a href="#CPD 21-10">CPD 21-10</a> on the HUD Exchange for more information.

The Arkansas Development and Finance Authority (ADFA), proposes to focus its HOME-ARP funding on non-congregate shelter, supportive services, and non-profit operations. Project selection will be made on an ongoing basis through a competitive Notice of Funding Opportunity (NOFO). ADFA will award funds through the application process until all funds are committed. As part of ADFA's method of selection, applications will be evaluated based on the applicant's ability to obligate HOME-ARP funds and undertake eligible activities in a timely manner, their development capacity (for non-congregate shelter applications); their experience with federal affordable housing programs; and their ability to cover the operating expenses for non-congregate shelter applications for the full 10-15 years.

Applications will only be accepted for HOME-ARP Non-Congregate Shelter Housing, Supportive Services and Non-Profit Operating Assistance. Before awarding funds for HOME-ARP NCS projects, ADFA will take the following actions as part of its NOFO:

- Require that the developer submit evidence of appropriate skills and experience related to the development of shelters or similar facilities.
- Require the owner to submit evidence of prior experience with operating shelters.
- Require an acquisition or development budget, timeline, and sources and uses statement for the acquisition and/or development of the project be submitted for review.
- Require the owner to submit a proposed operating budget, including secured sources for operating costs and any operating gap that will require additional assistance. If there is a gap in the operating budget, ADFA will require the owner to submit a plan for securing

additional private, local, state, or Federal funding sufficient for successful operation of the project.

Before committing funds, ADFA will ensure the owner intends to continue operating the project as HOME-ARP NCS or emergency shelter NCS under ESG for the entire full restricted use period.

ADFA will review applications based on the date and time received. The underwriting process may include submission of additional information or documentation within the specified time period. If an applicant does not submit additional information within the specified time period, or does not otherwise successfully complete the underwriting process, the application will be denied.

All awards are made at the sole discretion of ADFA. Applicants approved for funding should be prepared to initiate projects within thirty (30) days of the execution of the funding agreement.

Upon request, unfunded applicants will have the opportunity to review their application with ADFA staff.

Maximum Funding Amount: ADFA has placed a maximum funding amount as follows:

- Non-Congregate Shelter Acquisition and Development \$7,000,000 per application
- Supportive Services- \$1,000,000 per application
- Non-Profit Operating- May not exceed the greater of 50% of the general operating expenses of the organization or \$50,000, in any fiscal year.

# B. Direct Administration by PJ

Describe whether the PJ will administer eligible activities directly.

ADFA will contract with subgrantees for the implementation of activities and monitor all activity delivery.

# C. No Use of Subrecipient

ADFA has not provided funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP Allocation Plan and will not allocate funds to a subrecipient nor contractor to administer the entire HOME-ARP grant.

#### D. Use of HOME-ARP Funding

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 and administrative costs is within HOME-ARP limits.

	Funding Amount	Percent of the Grant
Supportive Services	\$ 10,137,692.50	27%
Acquisition and Development of Non-Congregate Shelters	\$ 21,026,326.00	56%
Tenant Based Rental Assistance (TBRA)	\$0	0%
Development of Affordable Rental Housing	\$0	0%
Non-Profit Operating	\$ 1,877,350.50	5%
Non-Profit Capacity Building	\$0	0%
Administration and Planning	\$ 4,505,641.00	12%
Total HOME ARP Allocation	\$ 37,547,010.00	100%

#### Distribution of HOME-ARP funds In Accordance with Priority Needs

ADFA reviewed the gap analysis for shelter, affordable and supportive housing, as well as feedback and experience from those working to end homelessness in the Balance of State. As a result, ADFA proposes to focus its HOME-ARP funding on non-congregate shelter, supportive services and nonprofit operating assistance. The State's HOME-ARP allocation presents the opportunity to make a substantial investment in shelter and services that will strengthen the State's homeless system of care. The individual activities that will be considered must address the shortage of non-congregate, housing-focused emergency shelter and supportive service options that currently exist in the State.

Similarly, HOME-ARP services' funding will leverage resources such as Medicaid, HUD Continuum of Care (CoC) funds, and behavioral health funding to strengthen supportive services targeted to transition Qualifying Populations into permanent housing.

Availability of appropriate shelter varies across the State and demand for new and improved shelter facilities continues to be a critical need. Investment of HOME-ARP funds in non-congregate shelter will provide continued opportunities to serve all qualifying populations who are experiencing homelessness.

Availability of appropriate supportive services also varies within the State. Ensuring that occupants of HOME-ARP non-congregate shelter and other homeless housing in the State are offered appropriate services, including those that are less frequently available or unavailable in rural areas, will support long-term housing stability and decrease the likelihood of a return to homelessness.

Many nonprofit partners have the capacity to deliver services and manage shelter yet lack development and property management experience. Others have the capacity to develop, manage and deliver services, yet struggle to secure the operating funds necessary to ensure consistency in operations. Nonprofit partners will benefit from operating assistance to support their efforts to develop appropriate shelter, housing, and services. Operating assistance will help fill gaps in available administrative funding, particularly in organizations that are expanding and/or serving areas with few providers and limited shelter and/or affordable rental housing.

ADFA will administer the HOME-ARP allocation and oversee all projects to completion.

As described in <u>Section 5.A. Method of Selection</u>, ADFA will issue a Notice of Funding Opportunity (NOFO), soliciting applications for funding until all funds are committed. Applications will be

accepted for HOME-ARP Non-Congregate Shelter Housing, Supportive Services and Non-Profit Operating Assistance. If applicants have questions or wish to discuss their plans prior to application submission, ADFA will make staff available to answer any questions. ADFA will provide background information about what is expected to meet the non-congregate shelter and housing-focused services criteria. The solicitation will clearly outline any other conditions that ADFA will require to receive funding.

For Supportive Services, based on feedback received from the initial public participation and stakeholder engagement, as well as additional public comments received in response to the draft Allocation Plan, ADFA may identify specific supportive services needed to address the gaps identified in the needs assessment and gaps analysis.

Funding for supportive services, including housing stabilization activities, may include direct services such as, but not limited to, case management, mental health and substance abuse services and treatment, support with housing related applications, and other healthcare related services.

ADFA will develop the application process for organizational support to nonprofit homeless providers to develop organizational capacity to provide services.

ADFA will announce the projects that were awarded HOME-ARP funding on its website, on Facebook, and through other social media.

#### Rationale Funding Based on Characteristic Needs Identified in the Gap Analysis

During its consultation process, ADFA heard from several organizations that the need for capital improvements or acquisition/development of non-congregate shelters was a critical need. An inventory of the housing needs and gaps assessment, including robust stakeholder feedback, illustrates that there are insufficient non-congregate shelter beds for the general population experiencing homelessness in the State of Arkansas.

Other funding sources that are currently available and accessible to ADFA provide the opportunity for the State to provide more affordable rental housing and rental assistance. However, there is limited available funding that provides for investment in the long-term homeless delivery infrastructure that can be used to construct, renovate, or rehabilitate buildings for use as non-congregate shelter. Some shelters may serve some specific sub-populations (e.g., veterans or women with children). To bring more capital resources into the State and to ensure shelters are more accessible and effective, ADFA will leverage HOME-ARP resources to support

organizations willing to increase access to non-congregate shelters. All organizations serving qualified populations will be eligible to apply for funding.

Additionally, the public funding mechanism for health and substance abuse, housing support and stabilization, does not allow provider agencies to build long-term capacity. Service funding does not always cover the actual administrative costs to the provider agency and is highly variable. Service providers are also struggling to meet staffing needs or to offer higher wages or other incentives needed to be competitive in the current job market. HOME-ARP resources will provide funding for needed mental health services, including but not limited to, home stabilization, transition services, eviction prevention and other prevention services.

#### 6. HOME-ARP Production Housing Goals

#### A. Estimated Number of Affordable Rental Housing Units for Qualifying Populations

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

ADFA will not be using the HOME-ARP allocation toward affordable rental housing units for qualifying populations. The focus of the State of Arkansas's HOME-ARP funding will be to increase the number of non-congregate shelter beds available statewide.

#### B. Rental Housing Production Goals and Correspondence with Need

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.

Not applicable to chosen HOME-ARP Activities.

#### 7. Preferences

The State of Arkansas has not given a preference to any of the qualifying populations or sub-populations. However, the Allocation Plan does propose to direct HOME- ARP funding to Non-Congregate Shelter, Supportive Services, and Nonprofit Operational Assistance. Both the shelter component and the Supportive Services component are prioritized as intending to serve all qualifying populations.

#### Identification of Preference

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.

There will be no preference for qualifying populations. The solicitation for applications will entertain projects targeted toward any or all qualifying populations who may need Non-Congregate Shelter and/or Supportive Services. ADFA will issue guidance in its NOFA regarding serving all populations. For the sheltered, unsheltered, and at risk of homelessness populations, ADFA will recommend use of the Coordinated Entry System (CES), which assesses homeless and at-risk status of each individual or household to determine program eligibility. Coordinated Entry will also work with the funded non-congregate shelters to secure permanent housing placements for each individual or household served.

For those requiring services or housing assistance to prevent homelessness, and those at greatest risk of housing instability or unsuitable housing situations who may fall outside CES, the State will utilize its 211 system to provide referrals to participating agencies to determine eligibility. As calls for assistance come through the 211 system and through local partners who serve qualifying populations who are not served by CES, referrals for supportive services and non-congregate shelter will be made to the HOME-ARP projects. The HOME-ARP service providers may develop waiting lists from those referrals, documenting the date households presented for assistance, whether through CES or 211, to determine the first come first serve order at their locations.

#### Using Preference to Address Unmet Need

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.

As described above, no preference has been identified.

#### 8. 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 (page 10).

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 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).

Not applicable to activity design.

#### 9. Limitations in a HOME-ARP Rental Housing or NCS Project

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.

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.

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).

Not applicable to chosen HOME-ARP activities.

#### 10. 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).

Not applicable to chosen HOME-ARP activities.

ATTACHMENTS – Public Hearing Minutes, Comments, and Legal Notices

# ARKASAS HOME-ARP ALLOCATION PLAN

# Public Hearing Minutes

Comments

Legal Notices

### **PUBLIC HEARING**

August 29, 2022, 10:00am

Minutes

# ARKANSAS DEVELOPMENT FINANCE AUTHORITY HOME INVESTMENT PARTNERSHIP PROGRAM AMERICAN RESCUE PLAN (HOME-ARP) ALLOCATION PLAN PUBLIC HEARING

AUGUST 29, 2022
CENTRAL HIGH/OLD MILL MEETING ROOM
DEPARTMENT OF COMMERCE, 1 COMMERCE WAY
LITTLE ROCK, AR

<u>ADFA Staff Present</u>: Lori Brockway, Federal Housing Programs Manager; Lanita Hastings, HOME Program Coordinator; Derrick Rose, Communications Director

ADFA Staff Present via Phone or Video: John Blackwell, Director of Tax Credits

<u>Arkansas Legislature Present</u>: Arkansas Senator Dan Sullivan

<u>Arkansas Legislature Present via Phone or Video:</u> Arkansas Representative Deborah Ferguson

Others Present: Phillip Fletcher, Phd, City of Hope Outreach

Others Present via Phone or Video: Casey Kidd and Sue Legal, Arkansas Balance of State Continuum of Care; Kevin Smith; Dana Moore; Casey Kleinhenz, Community Development Corporation Bentonville/Bella Vista; Jessica Minton, Department of Veteran Affairs; Ben Glover, Ozark Opportunities; Rhonda Ahrent, Black River Area Development Corp. (BRAD); Nick Robbins, Returning Home; Rett Hatcher, J.D., CPA, Capitol Consulting Firm; Sydney Foster and Justin Sanders, Immerse Arkansas; Caroline Robbins, Our House; Matthew Desalvo, Salvation Army; Solomon Burchfield, New Beginnings; Bi-Partisan Strategies; Mike Williams, 7hills Homeless Center; ARCAN; Bud Cummins, J.D.; Keaton Smith, Partners for Better Housing

<u>Opening Statement and Call to Order:</u> Lanita Hastings, HOME Program Coordinator, began the meeting at approximately 10:00am, Monday, August 29, 2022, and welcomed all who were in attendance. Hastings stated that the option to view closed captions was available to those attending via zoom.

Hastings then introduced, Lori Brockway, Federal Housing Programs Manager. Hastings requested that any questions be addressed to Brockway in writing via email to: Lori.Brockway@Arkansas.gov or via mail to: Attn. Lori Brockway, Arkansas Development Finance Authority (ADFA), 1 Commerce Way, Suite 602, Little Rock, AR 72202.

Hastings followed with a presentation of the proposed ADFA HOME-ARP Program funded through the Department of Housing and Urban Development (HUD), stating that ADFA will receive \$37.5 million, upon HUD's approval of the Arkansas HOME-ARP Allocation Plan, to be divided among the eligible activities: 55% - \$20.65 million to Acquisition and Development of Non-Congregate Shelter (NCS); 20% - \$7.5 million to Supportive Services; 5% - \$1.88 million each to Operational and Capacity Building; and finally 15% - \$5.6 million to Administration of the Program. Hastings explained that beneficiaries are not qualified based on income, but rather they must be one of the 'Homeless' of the Qualified Population, as defined in CPD-21-10.

The presentation further defined the qualifying populations to be serviced through the HOME-ARP funds as: Homeless; At risk of Homelessness; Fleeing or Attempting to Flee Domestic Violence, Sexual Assault, Stalking, or Human Trafficking; Other Populations, and Veterans and their Families who also meet one of the previous Qualifying Population definitions; all of which are specified in <u>Section IV.A. of the HOME-ARP Notice - CPD-21-10</u>. Additional details were presented regarding each of the eligible activities to include eligible costs, reporting requirements, and limitations for each activity.

Additionally, Hastings referred attendees to <u>HUD Notice CPD-21-10</u>: Requirements of the Use of Funds in the HOME-ARP Program, and the HOME-ARP Allocation Plan published online for more specific details regarding the HOME-ARP Program for further review. She reiterated that all comments will be taken into consideration and requested that questions be submitted in writing, if possible, to Lori Brockway, via the email or mail addresses provided to all attending in person or virtually. Hastings then requested if anyone attending would like to make any comments.

In response to a question made by Dr. Fletcher, City of Hope Outreach and Matthew DeSalvo, Salvation Army; Hastings and Brockway further explained more specifically that rental and utility assistance are eligible costs under the Supportive Services eligible activity. Hastings explained that recently released incarcerated individuals who may be homeless are defined in CPD-21-10 as a qualifying population, in response to question presented by Matthew Desalvo.

Arkansas State Senator Dan Sullivan asked if the comments will be recorded, to which Hastings reiterating that any comments or opinions made during the Public Hearing will be recorded and considered. Additionally, HUD will review and approve the HOME-ARP allocation plan. Comments made by Dr. Phillips Fletcher with City of Hope Outreach were addressed by Hastings and Brockway, further explaining that organizations may apply for any or all, of the eligible activities as detailed within the HOME-ARP Allocation Plan. Arkansas State Representative Deborah Ferguson inquired if faith-based entities could apply for funding with HOME-ARP. Hastings responded that all non-profits serving the qualified population as defined in CPD-21-10 could apply for HOME-ARP eligible activities, including faith-based entities.

Jessica Minton, Department of Veterans Affairs, commented via chat and narrated by

Derrick Rose, ADFA Communications Director, "Please reconsider and use a significant portion of the funds to support development of affordable (defined as rents between 90 and 110% of HUDs FMR for an area) and low barrier (defined as open to accepting tenants with poor credit, history of legal involvement, previous evictions and little or no income) housing that is decent (defined as able to pass a minimum housing quality standard HUD inspection) and for affordable, decent, safe housing for special needs populations. By your own report these combined are by far the largest need expressed by stakeholders. The projects for affordable housing already in the pipeline to my knowledge are not targeted for homeless individuals, not likely to be the kind of low barrier units needed and will not be sufficient to meet the demand. My opinion is that we NEED the development of permanent and affordable housing, as this is the biggest need for the Homeless Individuals we serve. This also must be low-barrier to allow ACCESS of the population of Veterans we serve. My opinion is that, although shelter funding is great, we have NO affordable housing to place these individuals in. After public comment, what is the next step? Will we be able to ask further questions?" Brockway reminded those attending that ADFA will be happy to respond to questions submitted in writing via email or mail.

Ms. Brockway stated that ADFA would welcome that question via email. Derrick Rose reminded attendees that this is an opportunity to express your concerns, for or against the HOME-ARP Allocation Plan as currently published. Any questions should be forwarded to ADFA in writing.

Casey Kleinheinz, Community Development Corporation Bentonville/Bella Vista, stated that he was in support of the Plan, which is very innovative, and he was eager and curious to see the guidance for the Supportive Services funding within the development projects. This would be combining a real-estate budget with a services budget, and that he would like to see the State do as much as possible to encourage and assist developers to build sustainable projects.

Solomon Burchfield, New Beginnings Shelter, who provides non-congregate shelter for persons who have been chronically un-sheltered. Burchfield stated that he was pleased to see funding for staff development included in the Plan. Additionally, he stated that he wished the Plan offered more funding toward permanent housing rather than just non-congregate shelter. He also stated that shelter is a life-affirming intervention, and he recognized the priority across the State to offer that, to scale, for the number of people who need to access that shelter. However, he affirms that the real barrier from people transitioning out of 'shelter' into housing that is affordable, with supportive services, allowing residents to stabilize in that permanent housing, Many chronically homeless individuals really have on-going support needs, therefore I would encourage ADFA to increase the percentage that could be made available to housing projects that can provide permanent housing for people who are chronically homeless, with ongoing support needs.

Hastings reiterated that ADFA appreciates your opinions and comments, and welcome further questions via email or mail.

Brockway thanked attendees for their participation in the public hearing.

<u>Adjournment:</u> There being no additional comments, Brockway adjourned the meeting at approximately 10:35am,

Minutes approved and signed this 21st day of July 2022.

Lori Brockway,

Federal Housing Programs Manager

# HOME-ARP ALLOCATION PLAN

From: Casey Kidd
To: Lanita Hastings

Cc: Lori Brockway; Susan Gardner

Subject: RE: LEGAL NOTICE - AMERICAN RESCUE PLAN (HOME-ARP) - DRAFT ALLOCATION PLAN AND PUBLIC HEARING

**Date:** Tuesday, August 23, 2022 11:14:21 AM

Attachments: image004.png

image001.png image002.png

Importance: High

Some people who received this message don't often get email from ckidd@occnet.org. <u>Learn why</u> this is important

#### Good morning!

I am not sure if this is something that should be posted on public comments or just shared with you all as it relates to the number of CoCs in the state and PIT Count data. I have copied the information below and just typing in **green** the information that is correct.

#### Page 4:

Point-in-Time Count (PIT) data for 2020 is incomplete as all continuums of care in Arkansas did not participate in data collection. A 2019 Point-in-Time Count (PIT) for seven CoCs in Arkansas found a total of 84,212 sheltered homeless individuals and 1,625 unsheltered homeless individuals living throughout the state.

#### Page 13:

A 2019 Point-in-Time Count (PIT) for seven CoCs

in Arkansas found a total of 84,212 sheltered homeless individuals and 1,625 unsheltered homeless individuals living throughout the state.

#### Page 25:

A 2019 Point in Time Count for seven CoCs in Arkansas, found a total of 84,212 sheltered homeless individuals and 1,625 unsheltered homeless individuals throughout the state;

There are 5 Continuums in Arkansas which are AR-500 (CATCH), AR-501 (NWA), AR-503 (Balance of State), AR-505 (Southeast AR CoC), AR-508 (Old Fort).

In 2019, there were a total of 1302 sheltered individuals and 1415 unsheltered individuals reported to HUD by the 5 continuums for a total of 2717 reported as homeless (unsheltered, sheltered-emergency shelter, and sheltered-transitional housing). I'm not sure what other numbers might have been included in the 84,212 sheltered number, but these are the numbers that were reported to HUD for the 5 CoCs in the state of Arkansas.

2020 PIT Count Data: Unsheltered count 1273 and sheltered count 1093 for a total of 2366 homeless individuals (unsheltered, sheltered-emergency shelter, and sheltered-transitional housing). AR-508 did not participate.

#### 2021 PIT Count Data:

AR-500, AR-501, and AR-505 did sheltered count only. AR-503 and AR-508 did sheltered and

unsheltered count. Unsheltered count 669 and sheltered count 1470 for a total of 2139 homeless individuals (unsheltered, sheltered-emergency shelter, and sheltered-transitional housing).

2022 PIT Count Data has not been posted yet, but I did share the totals with the consultants for Balance of State AR-503. We completed a sheltered only count this year due to surge in Omicron variant. We reported 286 sheltered individuals.

All of the information above came from this link: PIT and HIC Data Since 2007 - HUD Exchange (choose the 2007-2021 Point-in-Time Estimates by CoC) option.

Please let me know if I need to post this information elsewhere, but I wanted to share it with you all first because I wasn't for sure if it should be shared in the public comment forum. Thanks for your help! Please let me know if I can provide any further information. Also, this is an amazing opportunity for so many agencies!! Thank you!!—Casey

Casey Kidd, MBA
Homeless Programs Director
Arkansas Balance of State Continuum of Care
Ouachita Children, Youth, & Family Services
ckidd@occnet.org
501-431-7041



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From: Lanita Hastings < Lanita. Hastings@arkansas.gov>

**Sent:** Tuesday, August 23, 2022 8:58 AM

Cc: Lori Brockway < lori.brockway@arkansas.gov>; Susan Gardner < Susan.Gardner@arkansas.gov> Subject: FW: LEGAL NOTICE - AMERICAN RESCUE PLAN (HOME-ARP) - DRAFT ALLOCATION PLAN

Importance: High

AND PUBLIC HEARING

#### **Legal Notice**

This notice was also published for statewide circulation in the classified adds of the Arkansas Democrat-Gazette, on Sunday, August 21, 2022.

NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD ON A DRAFT OF THE AMERICAN RESCUE PLAN (HOME-ARP) ALLOCATION PLAN, A SUBSTANTIAL AMENDMENT TO THE 2021 ACTION PLAN OF THE CONSOLIDATED PLAN FOR THE STATE OF ARKANSAS.

The State of Arkansas anticipates receiving approximately \$37.5 million in grant funds from the U.S. Department of Housing and Urban Development (HUD) for the 2021 program year. The amount includes funding for the American Rescue Plan (HOME-ARP), to be administered by the Arkansas Development Finance Authority (ADFA).

The State has completed a draft of the HOME-ARP Allocation Plan for the 2021 Program Year and hereby presents the draft for public review and comment. The comment period will extend for 16 days beginning on August 21, 2022, and will end at 4:30pm on September 6, 2022. Public comments will be considered in the final draft of the HOME-ARP Allocation Plan which will be submitted to the U.S. Department of Housing and Urban Development. To be considered in the final plan, written comments must be received during the 16-day public comment period. A copy of the HOME-ARP Allocation Plan may be viewed online at <a href="https://adfa.arkansas.gov">https://adfa.arkansas.gov</a>, and on State of Arkansas website at <a href="https://portal.arkansas.gov/events">https://portal.arkansas.gov/events</a>.

A public hearing to obtain citizen comments on the draft of the HOME-ARP Allocation Plan will be held, Monday, August 29, 2022, at 10:00am in the Central High Meeting Room, 2<sup>nd</sup> Floor of the Arkansas Department of Commerce, 1 Commerce Way, Little Rock, AR 72202. Participants are also encouraged to attend via Zoom with the virtual meeting information listed below. Live English closed captions will be an option. Spanish translation of closed caption transcription will be available after the hearing, upon request.

**HOME- ARP Public Hearing** 

Date: Monday, August 29, 2022

**Location:** Central High Meeting Room, 2<sup>nd</sup>

Floor, Arkansas Department of Commerce

1 Commerce Way, Little Rock, AR

72202

Time: <u>10:00am</u>

Virtual Meeting Link: <a href="https://tinyurl.com/bdffz6ja">https://tinyurl.com/bdffz6ja</a>

Virtual Meeting ID: 836 8910 1602

Passcode: 379586

If you are unable to attend the meeting, written comments may be addressed to: Lori Brockway, Federal Housing Programs Manager, Arkansas Development Finance Authority, 1 Commerce Way, Ste. 602, Little Rock, AR 72202, or email to: <a href="Lori.Brockway@Arkansas.gov">Lori.Brockway@Arkansas.gov</a> The deadline to submit written comments is 4:30pm on September 6, 2022.

The HOME-ARP Allocation Plan may be provided in alternative formats upon request (i.e., Braille, large print, audio tape) for the disabled, or in Spanish. Persons needing interpreters or other accommodations are requested to telephone the Arkansas Development Finance Authority at 501-682-5901, at least two days in advance, to make arrangements. You may also call 211 to be connected to us or dial 711 or 800-285-1131 to utilize TTY to Voice.



**HOME Program Coordinator** 



#### Lanita. Hastings@Arkansas.gov

Phone: (501) 682-5901 – Fax: (501) 682-5939 PO Box 8023, Little Rock, AR 72203-8023 1 Commerce Way, Suite 602, Little Rock, AR 72202

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From: Minton, Jessica Y. (FAV) (she/her/hers)

To: Lori Brockway; Lanita Hastings

Subject: Comment on AMERICAN RESCUE PLAN (HOME-ARP) - DRAFT ALLOCATION PLAN AND PUBLIC HEARING

**Date:** Friday, August 26, 2022 3:53:20 PM

Hello,

Thank you for sharing the draft of this plan. I appreciate the work that has gone into it so far.

Please reconsider and use a significant portion of the funds to support development of affordable (defined as rents between 90 and 110% of HUDs FMR for an area) and low barrier (defined as open to accepting tenants with poor credit, history of legal involvement, previous evictions and little or no income) housing that is decent (defined as able to pass a minimum housing quality standard HUD inspection) and for affordable, decent, safe housing for special needs populations.

By your own report these combined are by far the largest need expressed by stakeholders. The projects for affordable housing already in the pipeline to my knowledge are not targeted for homeless individuals, not likely to be the kind of low barrier units needed and will not be sufficient to meet the demand.

Thank you for your consideration.

Jessica

Jessica Minton, LCSW Coordinated Entry Specialist Department of Veterans Affairs Fayetteville, AR Email: Jessica.minton@va.gov

Email: Jessica.minton@va.gov

Cell: (479)200-4014

From: Minton, Jessica Y. (FAV) (she/her/hers)
To: Lori Brockway; Lanita Hastings

**Subject:** Census Bureau: 3.8 million renters will likely be evicted in the next two months — why the rental crisis keeps

getting worse RE: Comment on AMERICAN RESCUE PLAN (HOME-ARP) - DRAFT ALLOCATION PLAN AND PUBLIC

**HEARING** 

**Date:** Monday, August 29, 2022 8:51:41 AM

Interestingly, this article showed up in my feed this weekend. It further supports the need for affordable, low-barrier housing and gives some information related to equity. Link below.

"Rents up nearly 25% since before the pandemic"

"In the year before the pandemic, the country recorded a shortage of seven million affordable housing units for low-income renters, according to the Center for American Progress, creating a crisis that left just 37 affordable rental homes for every 100 low-income households looking to rent."

"Rising rents are hitting minorities harder than others, according to a Pew Research Center analysis of census data.

Among households headed by Black adults, 58% are renters, while 52% of those headed by Latino adults rented. That compares to a rental rate of slightly less than 40% of Asian-led households and 25% for households led by non-Hispanic white adults."

#### Census Bureau: 3.8 million renters will likely be evicted in the next two months — why the rental crisis keeps getting worse

Renters are hurting across the country. And it's about to get even harder.

<u>Census Bureau: 3.8 million renters will likely be evicted in the next two months — why the rental crisis keeps getting worse (moneywise.com)</u>

**From:** Minton, Jessica Y. (FAV) (she/her/hers)

Sent: Friday, August 26, 2022 3:53 PM

To: Lori Brockway < lori.brockway@arkansas.gov>; Lanita Hastings < Lanita.Hastings@arkansas.gov> Subject: Comment on AMERICAN RESCUE PLAN (HOME-ARP) - DRAFT ALLOCATION PLAN AND PUBLIC HEARING

Hello,

Thank you for sharing the draft of this plan. I appreciate the work that has gone into it so far.

Please reconsider and use a significant portion of the funds to support development of affordable (defined as rents between 90 and 110% of HUDs FMR for an area) and low barrier (defined as open to accepting tenants with poor credit, history of legal involvement, previous evictions and little or no income) housing that is decent (defined as able to pass a minimum housing quality standard HUD inspection) and for affordable, decent, safe housing for special needs populations.

By your own report these combined are by far the largest need expressed by stakeholders. The

projects for affordable housing already in the pipeline to my knowledge are not targeted for homeless individuals, not likely to be the kind of low barrier units needed and will not be sufficient to meet the demand.

Thank you for your consideration.

Jessica

Jessica Minton, LCSW Coordinated Entry Specialist Department of Veterans Affairs Fayetteville, AR Email: Jessica.minton@va.gov

Email: Jessica.iiiiitton@va.go

Cell: (479)200-4014

# RE: Ex-offenders for Home ARP



i) You forwarded this message on 8/29/2022 11:46 AM.





Public Hearing Presentation-Final-2.pdf pdf File



AR HOME ARP - DRAFT - Published - 08172022,pdf .pdf File

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Hello Nick,

Please see page 3 of CPD 21-10. This provides the definition of qualifying populations. That population would be a qualifying group if they meet the definition of homelessness, which I am sure most would.

Hope you find this helpful.

Thank you, Lori From: Nick Robbins < nick@returninghomenwa.com>

To: Lori Brockway < lori.brockway@arkansas.gov> Sent: Monday, August 29, 2022 10:10 AM

Subject: Ex-offenders for Home ARP

You don't often get email from nick@returninghomenwa.com. Learn why this is important

Are men and women being released from incarceration from jails and prisons qualify for the housing portion? Are they a qualifying group?

Nick Robbins

Returning Home

Chief Executive Officer

479-640-5358

nick@returninghomenwa.com





Public Hearing Presentation-Final-2.pdf ,pdf File

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CPD-21-10 - HUD - HOME-ARP Guide.pdf pdf File

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**4** 

Hello,

Lori Brockway

To Cance Johnston

Cc O Lanita Hastings

B

RE: Timeline

A review process has not been determined yet but I imagine we will use the same process as we do for other applications:

- Two reviewers per application
- If approved the application will be presented to staff Housing Review Committee If approved by staff HRC then will move to ADFA board for approval
- We will provide applications for all eligible activities

I am also including the power point slides, CPD 21-10, and the Allocation plan for you.

Thank you,

Lori

----Original Message--

From: Lance Johnston <a href="mailto:rom">lance Johnston@mac.com</a>
Sent: Monday, August 29, 2022 10:30 AM
To: Lori Brockway <a href="mailto:rokway@adfa.arkansas.gov">rokway@adfa.arkansas.gov</a>

Subject: Timeline

[You don't often get email from lancejohnston@mac.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Can you send me a timeline for applications, review and the process for who will review and make decisions on approval of applications. Also will there be a template or questionnaire to go along or follow for applications?

Lance Johnston

501-499-2814

lancejohnston@me.com

# RE: Receiving slides from Home-ARP presentation



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> AR HOME ARP - DRAFT - Published - 08172022.pdf

2 5 >

Public Hearing Presentation-Final-2.pdf .pdf File

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Hello,

2

CPD-21-10 - HUD - HOME-ARP Guide,pdf pdf File

I am attaching the slides, CPD 21-10, and the HOME-ARP allocation plan for your review.

Thank you!

Lori

From: Matthew Desalvo < Matthew. Desalvo@uss.salvationarmy.org>

Sent: Monday, August 29, 2022 10:33 AM

To: Lori Brockway <lori.brockway@arkansas.gov>

Subject: Receiving slides from Home-ARP presentation

You don't often get email from matthew.desalvo@uss.salvationarmy.org. Learn why this is important

Hello Lori,

I would be grateful to receive a copy of the slides from today's presentation, August 29th, to review and help us make an informed decision on applying.

Thanks so much!



MATTHEW DESALVO, LCSW

Central Arkansas Arca Command Director of Social Services

1111 West Markham Street, Little Rock AR 72201

Office: 501-374-9296

Salvarion Army Central Arkansas.org

# RE: Presentation slides



> AR HOME ARP - DRAFT - Published - 08172022.pdf ,pdf File

**3** ≥

CPD-21-10 - HUD - HOME-ARP Guide.pdf pdf File

.pdf File **€** #

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Public Hearing Presentation-Final-2.pdf

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Hello,

I have attached the HOME-ARP draft plan, CPD 21-10 and the slide presentation.

Thank you,

Lori

From: Dana Moore < dmoore@swfamily.org>

Sent: Monday, August 29, 2022 10:40 AM

To: Lori Brockway < lori.brockway@arkansas.gov>

Subject: Presentation slides

Ms. Brockway,

You don't often get email from dmoore@swfamily.org. Learn why this is important

Thank you so much, Dana Moore

Thank you for the meeting this morning. It was very helpful to me. Could you please let me know how I can print the slides?

\*Let us touch the dying, the poor, the lonely and the unwanted according to the graces we have received and let us not be ashamed or slow to do the humble work.\* ~ Mother Teresa of Calcutta

 From:
 Casey Kidd

 To:
 Lori Brockway

Subject: Re: LEGAL NOTICE - AMERICAN RESCUE PLAN (HOME-ARP) - DRAFT ALLOCATION PLAN AND PUBLIC HEARING

Date: Tuesday, September 6, 2022 3:25:13 PM

Attachments: image006.pnq

image007.png image008.png

You don't often get email from ckidd@occnet.org. Learn why this is important

#### Good afternoon, Lori!

Please find below my comments in addition to the items I sent regarding the PIT count numbers.

In many areas of Arkansas including Balance of State service area and Jonesboro, where I reside and see things first-hand, we are definitely in need of more non-congregate shelter space so that individuals and/or families have an opportunity to find safe and temporary housing. However, as survey data indicated, we are also in need of safe and affordable housing. Shelters are currently staying at capacity because of the lack of safe and affordable housing with low barrier entrance. While shelters are definitely something that should be funded, I just ask that ADFA and the team you are working with will consider repercussions of only developing shelter projects and not ensuring the ability for increased housing development. Shelters will continue to remain at capacity, and we will continue to see individuals and families struggling to find permanent housing. Again, I still believe funds should be put toward shelter space, but I do think some finding should be used for affordable housing unit development as well.

I have conversations almost daily about the need for both items. Thank you for these considerations!

Casey Kidd

#### Get Outlook for iOS

From: Lanita Hastings < Lanita. Hastings@arkansas.gov>

**Sent:** Monday, August 29, 2022 11:19:04 AM

To: Casey Kidd <ckidd@occnet.org>; Lori Brockway <lori.brockway@arkansas.gov>

Cc: Susan Gardner < Susan. Gardner@arkansas.gov>

Subject: RE: LEGAL NOTICE - AMERICAN RESCUE PLAN (HOME-ARP) - DRAFT ALLOCATION PLAN AND

**PUBLIC HEARING** 

Yes, you may. I will try to get them posted online as well.

Thank you!

Lanita Hastings
HOME Program Coordinator



#### Lanita.Hastings@Arkansas.gov

Phone: (501) 682-5901 - Fax: (501) 682-5939 PO Box 8023, Little Rock, AR. 72203-8023

1 Commerce Way, Suite 602, Little Rock, AR 72202

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From: Casey Kidd <ckidd@occnet.org>
Sent: Monday, August 29, 2022 10:48 AM

To: Lori Brockway <lori.brockway@arkansas.gov>; Lanita Hastings <Lanita.Hastings@arkansas.gov>

Cc: Susan Gardner < Susan Gardner@arkansas.gov>

Subject: RE: LEGAL NOTICE - AMERICAN RESCUE PLAN (HOME-ARP) - DRAFT ALLOCATION PLAN AND

PUBLIC HEARING

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Good morning! Could I please get a copy of the slides that were presented at today's meeting if possible?

Thanks! - Casey

From: Lori Brockway < lori.brockway@arkansas.gov>

Sent: Tuesday, August 23, 2022 2:07 PM

To: Casey Kidd < ckidd@occnet.org>; Lanita Hastings < Lanita Hastings@arkansas.gov>

Cc: Susan Gardner < Susan Gardner@arkansas.gov >

Subject: RE: LEGAL NOTICE - AMERICAN RESCUE PLAN (HOME-ARP) - DRAFT ALLOCATION PLAN AND

PUBLIC HEARING

Hello Casey,

Thank you for this information. We will be forwarding your email to the ADFA consultant who is working on this plan. Lanita had brought that to TDA's attention last week and they are working on updating these numbers for the final plan!

Again, we appreciate your input!

Have a great day.

Regards,

Lori

From: Casey Kidd < <a href="mailto:ckidd@occnet.org">ckidd@occnet.org</a> Sent: Tuesday, August 23, 2022 11:14 AM

To: Lanita Hastings < Lanita. Hastings@arkansas.gov >

Cc: Lori Brockway < <a href="mailto:lori.brockway@arkansas.gov">lori.brockway@arkansas.gov</a> ; Susan Gardner < <a href="mailto:Susan.Gardner@arkansas.gov">Subject: RE: LEGAL NOTICE - AMERICAN RESCUE PLAN (HOME-ARP) - DRAFT ALLOCATION PLAN AND

PUBLIC HEARING Importance: High

Some people who received this message don't often get email from <a href="mailto:ckidd@occnet.org">ckidd@occnet.org</a>. <a href="mailto:Learn why this is important">Learn why this is important</a>

#### Good morning!

I am not sure if this is something that should be posted on public comments or just shared with you all as it relates to the number of CoCs in the state and PIT Count data. I have copied the information below and just typing in **green** the information that is correct.

#### Page 4:

Point-in-Time Count (PIT) data for 2020 is incomplete as all continuums of care in Arkansas did not participate in data collection. A 2019 Point-in-Time Count (PIT) for seven CoCs in Arkansas found a total of 84,212 sheltered homeless individuals and 1,625 unsheltered homeless individuals living throughout the state.

#### Page 13:

A 2019 Point-in-Time Count (PIT) for seven CoCs

in Arkansas found a total of 84,212 sheltered homeless individuals and 1,625 unsheltered homeless individuals living throughout the state.

#### Page 25:

A 2019 Point in Time Count for seven CoCs in Arkansas, found a total of 84,212 sheltered homeless individuals and 1,625 unsheltered homeless individuals throughout the state;

There are 5 Continuums in Arkansas which are AR-500 (CATCH), AR-501 (NWA), AR-503 (Balance of State), AR-505 (Southeast AR CoC), AR-508 (Old Fort).

In 2019, there were a total of 1302 sheltered individuals and 1415 unsheltered individuals reported to HUD by the 5 continuums for a total of 2717 reported as homeless (unsheltered, sheltered-emergency shelter, and sheltered-transitional housing). I'm not sure what other numbers might have been included in the 84,212 sheltered number, but these are the numbers that were reported to HUD for the 5 CoCs in the state of Arkansas.

2020 PIT Count Data: Unsheltered count 1273 and sheltered count 1093 for a total of 2366

homeless individuals (unsheltered, sheltered-emergency shelter, and sheltered-transitional housing). AR-508 did not participate.

### 2021 PIT Count Data:

AR-500, AR-501, and AR-505 did sheltered count only. AR-503 and AR-508 did sheltered and unsheltered count. Unsheltered count 669 and sheltered count 1470 for a total of 2139 homeless individuals (unsheltered, sheltered-emergency shelter, and sheltered-transitional housing).

2022 PIT Count Data has not been posted yet, but I did share the totals with the consultants for Balance of State AR-503. We completed a sheltered only count this year due to surge in Omicron variant. We reported 286 sheltered individuals.

All of the information above came from this link: PIT and HIC Data Since 2007 - HUD Exchange (choose the 2007-2021 Point-in-Time Estimates by CoC) option.

Please let me know if I need to post this information elsewhere, but I wanted to share it with you all first because I wasn't for sure if it should be shared in the public comment forum. Thanks for your help! Please let me know if I can provide any further information. Also, this is an amazing opportunity for so many agencies!! Thank you!!—Casey

Casey Kidd, MBA
Homeless Programs Director
Arkansas Balance of State Continuum of Care
Ouachita Children, Youth, & Family Services
<a href="mailto:ckidd@occnet.org">ckidd@occnet.org</a>
501-431-7041



### amazonsmile

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From: Lanita Hastings < Lanita. Hastings@arkansas.gov>

Sent: Tuesday, August 23, 2022 8:58 AM

Cc: Lori Brockway < <a href="mailto:loribrockway@arkansas.gov">lori Brockway@arkansas.gov</a> ; Susan Gardner < <a href="mailto:Susan.Gardner@arkansas.gov">Subject: FW: LEGAL NOTICE - AMERICAN RESCUE PLAN (HOME-ARP) - DRAFT ALLOCATION PLAN (HOME-ARP) - DRAFT AL

AND PUBLIC HEARING Importance: High

### Legal Notice

This notice was also published for statewide circulation in the classified adds of the Arkansas Democrat-Gazette, on Sunday, August 21, 2022.

NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD ON A DRAFT OF THE AMERICAN RESCUE PLAN (HOME-ARP) ALLOCATION PLAN, A SUBSTANTIAL AMENDMENT TO THE 2021 ACTION PLAN OF THE CONSOLIDATED PLAN FOR THE STATE OF ARKANSAS.

The State of Arkansas anticipates receiving approximately \$37.5 million in grant funds from the U.S. Department of Housing and Urban Development (HUD) for the 2021 program year. The amount includes funding for the American Rescue Plan (HOME-ARP), to be administered by the Arkansas Development Finance Authority (ADFA).

The State has completed a draft of the HOME-ARP Allocation Plan for the 2021 Program Year and hereby presents the draft for public review and comment. The comment period will extend for 16 days beginning on August 21, 2022, and will end at 4:30pm on September 6, 2022. Public comments will be considered in the final draft of the HOME-ARP Allocation Plan which will be submitted to the U.S. Department of Housing and Urban Development. To be considered in the final plan, written comments must be received during the 16-day public comment period. A copy of the HOME-ARP Allocation Plan may be viewed online at <a href="https://adfa.arkansas.gov">https://adfa.arkansas.gov</a>, and on State of Arkansas website at <a href="https://portal.arkansas.gov/events">https://portal.arkansas.gov/events</a>.

A public hearing to obtain citizen comments on the draft of the HOME-ARP Allocation Plan will be held, Monday, August 29, 2022, at 10:00am in the Central High Meeting Room, 2<sup>nd</sup> Floor of the Arkansas Department of Commerce, 1 Commerce Way, Little Rock, AR 72202. Participants are also encouraged to attend via Zoom with the virtual meeting information listed below. Live English closed captions will be an option. Spanish translation of closed caption transcription will be available after the hearing, upon request.

**HOME- ARP Public Hearing** 

Date: Monday, August 29, 2022

**Location:** Central High Meeting Room, 2<sup>nd</sup>

Floor, Arkansas Department of Commerce

1 Commerce Way, Little Rock, AR

72202

Time: 10:00am

Virtual Meeting Link: <a href="https://tinyurl.com/bdffz6ja">https://tinyurl.com/bdffz6ja</a>

Virtual Meeting ID: 836 8910 1602

Passcode: 379586

If you are unable to attend the meeting, written comments may be addressed to: Lori Brockway, Federal Housing Programs Manager, Arkansas Development Finance Authority, 1 Commerce Way, Ste. 602, Little Rock, AR 72202, or email to: <a href="mailto:Lori.Brockway@Arkansas.gov">Lori.Brockway@Arkansas.gov</a> The deadline to submit written comments is 4:30pm on September 6, 2022.

The HOME-ARP Allocation Plan may be provided in alternative formats upon request (i.e., Braille, large print, audio tape) for the disabled, or in Spanish. Persons needing interpreters or other accommodations are requested to telephone the Arkansas Development Finance Authority at 501-682-5901, at least two days in advance, to make arrangements. You may also call 211 to be connected to us or dial 711 or 800-285-1131 to utilize TTY to Voice.

### Lanita Hastings

HOME Program Coordinator



### Lanita.Hastings@Arkansas.gov

Phone: (501) 682-5901 - Fax: (501) 682-5939 PO Box 8023, Little Rock, AR. 72203-8023

1 Commerce Way, Suite 602, Little Rock, AR 72202

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### Comment 9

From: Eric Gilmore
To: Lori Brockway

**Subject:** Comment on HOME-ARP Plan

Date: Tuesday, September 6, 2022 3:45:22 PM

Attachments: Immerse—Immerse Red.pnq

You don't often get email from eric@immersearkansas.org. Learn why this is important

Hi Lori, Immerse Arkansas (<u>www.immersearkansas.org</u>) provides support to runaway and homeless youth, youth aging out of foster care, and youth victims of trafficking in the greater Little Rock area.

While I'm afraid we did not receive a survey during the assessment period, I wanted to share some additional information on the needs of youth and young adults as it relates to homelessness. Please accept the below as a comment regarding the current plan:

Immerse Arkansas (IA) has served runaway and homeless youth (RHY) in Arkansas since 2010. Through a youth center and transitional living program, Immerse provides comprehensive, trauma-informed programming to 300+ vulnerable youth ages 14-24 annually, supporting them towards improved social and emotional well-being, permanent connections, education and employment, and safe and stable housing.

For the purpose of the HOME-ARP assessment and state plan, Immerse Arkansas would like to provide the following information to underscore the need for support and shelter that is designed specifically for youth and young adults in the State of Arkansas.

The prevalence of runaway, homeless, and street youth (RHY) coupled with the limited availability of trauma-informed, youth-focused services, is particularly concerning in the State of Arkansas (AR). Safe and appropriate shelter for those experiencing homelessness is considerably limited, particularly for RHY. The 2018 Annual Homeless Assessment Report to Congress shows AR as one of 10 states in the nation in which more than half of people experiencing homelessness were unsheltered. Based upon 2020 Point In Time (PIT) Count data, approximately 31% (75/245) of the unaccompanied homeless youth ages 18-24 in AR were located in Little Rock/Central AR. Additionally, according to the AR Department of Education, approximately 855 public school students were reported as homeless during the 2021-2022 school year in Pulaski County. These numbers offer a limited view of the amount of RHY within Little Rock/Central AR. Actual numbers of RHY are likely larger with additional youth, such as those unstably housed while couchsurfing, which are not counted in data based upon the HUD-defined homelessness criteria. In 2021 alone, 178 youth aged out of foster care in AR (AR Department of Human Services, 2020). Youth who age out of foster care are more likely to experience homelessness than their non-system counterparts<sup>1</sup>.

Based on this data, IA estimates that there are at least 1,000 RHY in Pulaski County, AR in need of comprehensive youth-focused services. As the geographic and commercial center of AR, many RHY find themselves in and around the capital city, including those who have aged out of foster care and are homeless, runaway due to abuse or neglect, or been subjected to trafficking and sexual exploitation. As such, Pulaski County is an important target for the

development of stronger support and shelter for RHY in Arkansas.

### **Human Trafficking in Arkansas**

According to the Federal Bureau of Investigation (FBI) (2011), interstate highways, such as Interstate 40 which extends through the country and central AR, are often used to transport trafficked youth, making cities along these highways hubs for trafficking. Additionally, the National Human Trafficking Center (2015) highlighted the Little Rock area as having significant potential for trafficking. According to the National Human Trafficking Hotline, 99 cases of human trafficking were reported in 2020. Trafficking rates are likely much higher than numbers reflect, as victims are often reluctant to report due to distrust of law enforcement, fear of their trafficker, or feelings of shame.

### **Additional Vulnerabilities of RHY**

RHY in AR and Pulaski County face a variety of other physical, economic, social, financial, and institutional vulnerabilities, further detailed in the table below:

5

Pregnancy <sup>2</sup>	<ul> <li>AR Teen Birth Rate: Highest in the nation (2019)</li> <li>Pulaski County Teen Birth Rate (2012-2016): 37.6 births per 1,000 females ages 15-19</li> </ul>
Education <sup>3</sup>	• <u>Pulaski County</u> Special School District Graduation Rate 2019-2020: 85%
Mental Health <sup>4</sup>	•Teen Suicide up 30% in AR in 2019 (increase from 11.0 to 14.3 deaths per 100,000 adolescents)
Physical Health <sup>5</sup>	<ul> <li>AR has highest rate of obesity among high schoolers (27.1%) out of 43 states participating in survey</li> <li>AR has 3rd highest obesity rate among adults out of all 50 states (37.1%)</li> </ul>
Child Welfare <sup>6</sup>	<ul> <li>2020 child welfare caseload average: State (18) vs <u>Pulaski County</u> (22)</li> <li>9,114 reports of child maltreatment found to be true in Arkansas in 2020</li> <li>Average number of placements annually per youth in 2016: National standard (4.1 moves) vs. State average (8.1 moves)</li> </ul>
Employment	•2019 AR Unemployment Rate (Ages 16-19): 3rd highest in U.S. <sup>7</sup> •2015 rate of youth ages 16-24 not attending school or working: State (15%) vs. National (7%) <sup>8</sup>
Delinquency9	<ul> <li>Youth residing in juvenile detention and/or residential facilities</li> <li>○State (215) vs. National (173) (per 100,000)</li> <li>◆Pulaski County: Highest number of juvenile commitments in AR</li> </ul>

Runaway <sup>10</sup>	National Runaway Safeline (NRS): 329 calls/chats in Arkansas in 2019
Substance Use <sup>11</sup>	• AR: reported in the highest percentage range of high school students who reported: prescription pain medicine misuse (16.6%-22.7%); inhalants use (8.2%-15%); methamphetamine use (4.2%-10.4%)

### **Cost of Non-intervention**

If RHY are not connected to appropriate shelter and support, they are often faced with not only less effective, but often re-traumatizing alternatives. Please refer to the table below for a comparison of more expensive, yet less holistic and effective alternatives to youth and young adult service providers. Additionally, without youth-centered, trauma-informed services, many RHY remain on the street or in unsafe environments and continue to be atrisk or subjected to sexual abuse, sexual exploitation, and severe forms of trafficking in persons.

Institution/ Setting	Daily Rate (DR) Per Youth	Annual Cost Per Youth	Services Included
Emergency Room <sup>12</sup>	\$1,233	5 <b></b> 2	Emergency medical treatment
Substance Use <sup>13</sup> Treatment	\$175 (& one- time assessment fee of \$420)	\$68,040	Room, board, substance abuse treatment
Residential Treatment Facility <sup>14</sup>	\$145	\$52,925	Room, board, individual and/or group therapy
Juvenile Detention <sup>15</sup>	\$232	\$84,680	Room, board, behavioral treatment

Creating and strengthening shelter options and supportive services for 14-24yo's in Arkansas is critical to well-being of many vulnerable young people. In addition, it provides cost-savings to taxpayers and Arkansas as a whole.

1

Rachel Rosenberg & Youngmi Kim (2018) Aging Out of Foster Care: Homelessness, Post-Secondary Education, and Employment, Journal of Public Child Welfare, 12:1, 99-115, DOI: 10.1080/15548732.2017.1347551

<sup>2</sup> CDC, National Center for Health Statistics, 2019; Arkansas Department of Health Spring Data Deck, 2018 <sup>3</sup> Arkansas Department of Education, Pulaski County Special School District Graduation Rate 2019-2020 <sup>4</sup> CDC WONDER Online Database, Underlying Cause of Death, Multiple Causes of Death files, 2019 <sup>5</sup> Robert Wood Johnson Foundation, State of Childhood Obesity, 2017 (high schooler rate), 2018 (adult rate) <sup>6</sup> Arkansas Department of Human Services, 2020; Arkansas Department of Human Services, 2016 <sup>7</sup>U.S. Census Bureau, 2008-2019 American Community Survey

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### Eric Gilmore, MSW

Executive Director, Immerse Arkansas

O:(501) 404-9890 x 700 | F: (866) 449-2556

www.immersearkansas.org



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<sup>&</sup>lt;sup>8</sup> Annie E. Casey Foundation, KIDS COUNT Data Center, 2015

<sup>&</sup>lt;sup>9</sup> Annie E. Casey Foundation, KIDS COUNT Data Center, 2013; Arkansas Division of Youth Services, 2016
<sup>10</sup> National Runaway Safeline, 2019

<sup>&</sup>lt;sup>11</sup>CDC, High School Youth Risk Behavior Surveillance System (YRBSS), 2019

<sup>&</sup>lt;sup>12</sup> Caldwell, Nolan et al. "'How Much Will I Get Charged for This?' Patient Charges for Top Ten Diagnoses in the Emergency Department." Ed. Harry Zhang. *PLoS ONE* 8.2 (2013): e55491. *PMC*.

<sup>&</sup>lt;sup>13</sup> Daily Bed Rate based upon local Recovery Centers of Arkansas costs.

<sup>&</sup>lt;sup>14</sup>Arkansas Department of Youth Services Statistical Report (2016)

<sup>&</sup>lt;sup>15</sup> Daily Bed Rate based upon local Recovery Centers of Arkansas costs.

### LEGAL NOTICE

### Public Hearing and Comment Period

### Arkansas Democrat To Gazette

STATEMENT OF LEGAL ADVERTISING

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### Arkansas Democrat To Gazette

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NOTICE OF PUBLIC HEARING
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ON A DRAFT OF THE AMERICAN
RESCUE PLAN (HOME-ARP) ALLOCATION PLAN, A SUBSTANTIAL
AMENDMENT TO THE 2021 ACTION PLAN OP THE CONSOLIDATED PLAN FOR THE STATE OF
ARKANSAS.
The State of Arkansas anticle

The State of Arkansas anticipates receiving approximately \$37.5 million in grant funds from

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The State has completed a draft of the HOME-ARP Allocation Pian for the 2021 Program Year and hereby presents the draft for public review and comment. The comment period will extend for 16 days beginning on August 21, 2022, and will end at 4;30pm on September 6, 2022. Public comments will be considered in the final draft of the HOME-ARP. Allocation Plan which will be submitted to the U.S. Department of Housing and Urban Development. To be considered in the final plan, written comments must be re-

Housing and Urban Development. To be considered in the final plan, written comments must be received during the 16-day public comment period. A copy of the HOME-ARP Allocation Plan may be viewed of the 10-day and the size of Arkansas website at https://dafa.arkansas.gov/and on State of Arkansas website at https://dafa.arkansas.gov/events. A public hearing to obtain citizen comments on the draft of the HOME-ARP Allocation Plan. will be held, Monday, August 29, 2022, at 10-00am in the Central High Meeting-Room, 2nd Floor, of the Arkansas Department of Commerce, 1 Commerce Way, Little Rock, AR 72202. Participants are also, encouraged to attend-via Zoom with the virtual meeting in formation listed below. Live English closed captions will be an option. glish closed captions will be an option. Spanish translation of closed caption transcription will be available after the hearing.

upon request.
HOME- ARP Public Hearing
Date: Monday, August 29, 2022Location: Central High Meeting
Room, 2nd Floor, Arkansas De-

partment of Commerce 1 Commerce Wayn Little Rock, AR 72202
Time: 10:00am
Virtual Meeting Link:
https://inyur.com/bdffz6ja
Virtual Meeting ID: 836 8910
1602 - Passcode: 379586
If you are unable to attend the meeting, written comments may be addressed to: Lori Brockway, Federal Housing Programs Manager, Arkansas Development Finance Authority, 1 Commerce Way, Ste. 602. Little Rock, AR 72202, or email to: Lori Brockway@Arkansas.gov The deadline to submit written comments is 4:30pm on September 6, 2022.
The HOME-ARP Allocation Plan may be provided in atternative formats upon fequest (i.e., Braille, large print, audio tape) for the disabled, or in Spanish. Persons needing interpreters or other accommodations are requested to telephone the Arkansas Development Financé Authority at 501-682-5901, at least two days in advance, to make arrangements. You máy also call 211 to be conadvance, to make arrangements. You may also call 211 to be connected to us or dial 711 or 800-285-1131 to utilize TTY to

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ARP) ALLOCATION PLAN, A SUBSTANTIAL AMENDMENT TO THE 2021 ACTION PLAN OF THE CONSOLIDATED PLAN FOR NOTICE OF PUBLIC HEARING AND PUBLIC COMMENT PERIOD ON A DRAFT OF THE AMERICAN RESCUE PLAN (HOME-THE STATE OF ARKANSAS

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HOME- ARP Public Hearing

Date: Monday, August 29, 2022

Location: Central High Meeting Room, 2nd Floor, Arkansas Department of Commerce 1 Commerce Way, Little Rock,

Time: 10:00am

Virtual Meeting Link: https://tinyurl.com/bdffz6ja

Virtual Meeting ID: 836 8910 1602 - Passcode: 379586

to telephone the Arkansas Development Finance Authority at 501- 682-5901, at least two days in advance, to make email to: Lori.Brockway@Arkansas.gov The deadline to submit written comments is 4:30pm on September 6, 2022. Programs Manager, Arkansas Development Finance Authority, 1 Commerce Way, Ste. 602, Little Rock, AR 72202, or If you are unable to attend the meeting, written comments may be addressed to: Lori Brockway, Federal Housing audio tape) for the disabled, or in Spanish. Persons needing interpreters or other accommodations are requested arrangements. You may also call 211 to be connected to us or dial 711 or 800-285-1131 to utilize TTY to Voice. The HOME-ARP Allocation Plan may be provided in alternative formats upon request (i.e., Braille, large print,

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### ADFA WEBSITE NOTICE

### Public Hearing and Comment Period

## ALLOCATION PLAN PUBLIC HEARING AND PUBLIC COMMENT ON DRAFT HOME-ARP

## PUBLIC HEARING AND PUBLIC COMMENT ON DRAFT HOME-ARP ALLOCATION PLAN

1 COMMERCE WAY

Little Rock, AR 72202

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## Download a copy of the HOME-ARP ALLOCATION PLAN here.

encouraged to attend via Zoom with the virtual meeting information listed below. Live English dosed captions will be an option. Spanish translation of Central High Meeting Room, 2nd Floor of the Arkansas Department of Commerce, 1 Commerce Way, Little Rock, AR 72202 Participants are also closed caption transcription will be available after the hearing, upon request. A public hearing to obtain citizen comments on the draft of the HOME-ARP Allocation Plan will be held, Monday, August 29, 2022, at 10:00am in the

Date: Monday, August 29, 2022 HOME- ARP Public Hearing

Location: Central High Meeting Room, 2nd Floor, Arkansas Department of Commerce

I Commerce Way, Little Rock, AR 72202

LINK TO JOIN VIRTUAL MEETING

Meeting ID: 836 8910 1602

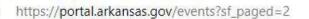
Passcode: 379586

Development Finance Authority, 1 Commerce Way, Ste. 602, Little Rock, AR 72202, or email to: Lori,Brockway@Arkansas.gov The deadline to submit If you are unable to attend the meeting, written comments may be addressed to: Lpri Brockway, Federal Housing Programs Manager, Arkansas written comments is 4:30pm on September 6, 2022.

least two days in advance, to make arrangements. You may also call 211 to be connected to us or dial 711 or 800-285-1131 to utilize TTY to Voice. Persons needing interpreters or other accommodations are requested to telephone the Arkansas Development Finance Authority at 501-682-5901, at The HOME-ARP Allocation Plan may be provided in alternative formats upon request (i.e., Bralle, large print, audio tape) for the disabled or in Spanish

### STATE WEBSITE NOTICE

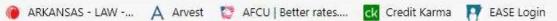
### Public Hearing and Comment Period



ccounting Coach















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### Commercial Board Meeting

Commercial Board Hearing & License Approval

Posted By: Contractors Licensing Board

### 3rd Quarterly Land Survey Advisory Board Meeting

3rd Quarterly Land Survey Advisory Board Meeting Posted By: Division of Land Surveys

### PUBLIC HEARING ON HOME-ARP ALLOCATION PLAN

PUBLIC HEARING AND PUBLIC COMMENT ON DRAFT HOME...

Posted By: Arkansas Development Finance Authority

### Arkansas Public Service Commission

21-097-U IN THE MATTER OF THE APPLICATION OF ...

Posted By: Arkansas Public Service Commission

A	The Official Website of the State of Arkansas	
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RECREATION •	dals Arkansas Code State Employees Help Center Accessibility & Settings	

## PUBLIC HEARING ON HOME-ARP **ALLOCATION PLAN**

When: 08.29.22 10:00 AM - 11:30 AM

Where: Dept. of Commerce Building

1 COMMERCE WAY LITTLE ROCK, AR 72202

### **Event Description**

PUBLIC HEARING AND PUBLIC COMMENT ON DRAFT HOME-ARP ALLOCATION PLAN

AUG 29, 2022

1 COMMERCE WAY

Little Rock, AR 72202

ADFA.ARKANSAS.GOV

### SF-424, SF-424B, SF424D and HOME - ARP CERTIFICATION

OMB Number: 4040-0004 Expiration Date: 12/31/2022

Application for Federal Assistance SF-424			
*1. Type of Submission:       *2. Type of Application:         ☐ Preapplication       ☑ New         ☑ Application       ☐ Continuation         ☐ Changed/Corrected Application       ☐ Revision	* If Revision, select appropriate letter(s):  * Other (Specify):		
* 3. Date Received:  4. Applicant Identifier:			
5a. Federal Entity Identifier:	5b. Federal Award Identifier: M21-SP050100		
State Use Only:			
6. Date Received by State: 7. State Applica	ation Identifier:		
8. APPLICANT INFORMATION:			
*a. Legal Name: State of Arkansas	in the second se		
* b. Employer/Taxpayer Identification Number (EIN/TIN):			
d. Address:			
* Street1: 1 Commerce Way, Suite 602  Street2:  * City: Little Rock  County/Parish: Pulaski  * State: AR: Arkansas  Province:			
* Country: USA: UNITED STATES			
* Zip / Postal Code: 72202-2089			
e. Organizational Unit:  Department Name:  AR Dev. Finance Authority	Division Name: Federal Housing Program		
f. Name and contact information of person to be contacted or	n matters involving this application:		
Prefix: Ms. * First N Middle Name:  * Last Name: Brockway Suffix:	Name: Lori		
Title: Federal Housing Program Manager			
Organizational Affiliation: State Government			
* Telephone Number: 501-682-3339 Fax Number: 501-682-5859			
*Email: Lori.Brockway@arkansas.gov			

Application for Federal Assistance SF-424		
* 9. Type of Applicant 1: Select Applicant Type:		
A: State Government		
Type of Applicant 2: Select Applicant Type:		
Type of Applicant 3: Select Applicant Type:		
* Other (specify):		
* 10. Name of Federal Agency:		
U.S. Department of Housing and Urban Development		
11. Catalog of Federal Domestic Assistance Number:		
14-239		
CFDA Title:		
HOME Investment Partnerships Program - American Rescue Plan (HOME-ARP),		
* 12. Funding Opportunity Number:		
M21-SP050100		
* Title:		
State of Arkansas 2021 Annual Action Plan to the 2020-2024 5-Year Consolidated Plan.		
13. Competition Identification Number:		
Title:		
14. Areas Affected by Project (Cities, Counties, States, etc.):		
Add Attachment   Delete Attachment   View Attachment		
/dd/idd/iiidii		
* 15. Descriptive Title of Applicant's Project:		
HOME-ARP, to help communities provide housing, shelter, and services for people experiencing and		
other qualifying populations.		
Attach supporting documents as specified in agency instructions.		
Add Attachments Delete Attachments View Attachments		

Application for Federal Assistance SF-424		
16. Congressional Districts Of:		
* a. Applicant AR-all	*b. Program/Project AR-all	
Attach an additional list of Program/Project Congressional Districts	s if needed.	
	Add Attachment Delete Attachment View Attachment	
17. Proposed Project:		
* a. Start Date: 09/20/2021	* b. End Date: 09/30/2030	
18. Estimated Funding (\$):		
* a. Federal 37,547,010.00		
* b. Applicant		
* c. State		
* d. Local		
* e. Other		
* f. Program Income		
*g. TOTAL 37,547,010.00		
* 19. Is Application Subject to Review By State Under Execu	utive Order 12372 Process?	
a. This application was made available to the State under	the Executive Order 12372 Process for review on	
b. Program is subject to E.O. 12372 but has not been sel	ected by the State for review.	
c. Program is not covered by E.O. 12372.		
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "	Yes," provide explanation in attachment.)	
☐ Yes		
If "Yes", provide explanation and attach		
	Add Attachment Delete Attachment View Attachment	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)  ** I AGREE  ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.		
Authorized Representative:		
Prefix: Mr. *First	Name: William	
Middle Name: Asa		
*Last Name: Hutchinson, II		
Suffix:		
*Title: Governor of Arkansas		
* Telephone Number: 501-682-2345	Fax Number:	
*Email: info@governor.arkansas.gov		
* Signature of Authorized Representative:	* Date Signed: ×8-26-2022	

Sig

OMB Number: 4040-0007 Expiration Date: 02/28/2025

### **ASSURANCES - NON-CONSTRUCTION PROGRAMS**

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

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

NOTE:

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

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

- Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
- Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
- 6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C.§§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation

- Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U. S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (i) the requirements of any other nondiscrimination statute(s) which may apply to the application.
- 7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

- Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
- 10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514: (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-
- Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.

- 13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
- 14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
- 15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
- Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
- 17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
A December 1	Governor of Arkansas
for kartikinow	
APPLICANT ORGANIZATION	DATE SUBMITTED
for Arkansas Development Finance Authority (HOME_ARP)	8-26-2022

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

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

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

- Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
- Will give the awarding agency, the Comptroller General
  of the United States and, if appropriate, the State,
  the right to examine all records, books, papers, or
  documents related to the assistance; and will establish
  a proper accounting system in accordance with
  generally accepted accounting standards or agency
  directives.
- 3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
- Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
- 5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.

- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
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- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of

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- 18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
* A thin	Governor of Arkansas
La Mulin	
APPLICANT ORGANIZATION	DATE SUBMITTED
for Arkansas Development Finance Authority (HOME-ARP)	8-26-2022 ×

SF-424D (Rev. 7-97) Back

### **HOME-ARP CERTIFICATIONS**

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

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

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

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

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

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

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

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

Signature of Authorized Official

8-26-2022

Date

Governor of Arkansas

Title