

City of Baltimore HOME-ARP Allocation Plan

Background and Introduction

The American Rescue Plan Act of 2021 created a special allocation of \$5 billion to support state and local programs for populations experiencing homelessness or identified as at-risk of homelessness and housing instability. This special allocation is administered by the U.S. Department of Housing and Urban Development (HUD) through the HOME Investment Partnerships Program, with the primary goal being to assist four “qualifying populations” through four types of eligible activities.

Qualifying populations include those experiencing homelessness, those at-risk of homelessness, people fleeing or attempting to flee intimate partner violence, stalking or human trafficking, and other populations at the greatest risk of experiencing housing instability.

Eligible activities that can be funded with HOME-ARP include: (1) development and preservation of affordable rental housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units (NCS). Recipients of HOME-ARP funds, known as Participating Jurisdictions (PJs), may use up to 10% of the award for Nonprofit Operating and Capacity Building Assistance and 15% of the award for Administration and Planning.

The City of Baltimore received an allocation of \$15,456,082 in HOME-ARP funds to pursue projects that fall within the four eligible activities listed above. To receive this allocation, the City of Baltimore, as a Participating Jurisdiction (PJ), must submit a HOME-ARP Allocation plan to HUD by March 31, 2023 as a substantial amendment to the Program Year 2021-22 Annual Action Plan. The Allocation Plan must describe the intended distribution of HOME-ARP funds, including how these funds will be used to address the needs of the HOME-ARP qualifying populations (QPs).

The Allocation Plan must include the following:

- A summary of the consultation process and results of upfront consultation with community stakeholders and those working with the qualifying populations;
- A summary of comments received through the public participation process and a summary of any comments or recommendations not accepted and the reasons why;
- A description of HOME-ARP qualifying populations within the jurisdiction;
- A needs assessment and an analysis of gaps in housing and shelter inventory, homeless assistance and services, and the homelessness prevention service delivery system;
- A summary of the planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations;



- An estimated number of housing units for qualifying populations the PJ will produce or preserve with its HOME-ARP allocation; and
- A description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population.

The Baltimore Department of Housing and Community Development, as the administering agency for the HOME-ARP funds, has prepared the following Allocation Plan to meet the requirements of the release of HOME-ARP funding and to guide its strategy for maximizing the use of this new federal resource to reduce housing instability and homelessness in the City.

Executive Summary

Since 2021, the City of Baltimore has been developing and implementing a comprehensive [Strategic Investment Plan](#) to identify community priorities and the investments needed to prevent and reduce homelessness and housing instability in the City. The plan, published in March 2022, was directly informed and guided by robust community engagement activities designed to solicit feedback from a diverse group of stakeholders. A Core Leadership Team was formed to guide the implementation of the planning process and make recommendations on the potential sources to meet these needs based on their intended purpose and eligible activities that could be funded. The Core Leadership Team, and its successor, the Baltimore Leadership Committee on Housing and Homelessness is co-chaired by the Director of the Mayor's Office on Homelessness (MOHS) and the Commissioner of the Baltimore City Department of Housing and Community Development (DHCD) and comprised of City staff, Continuum of Care (CoC) leaders, people with lived expertise of homelessness, and representatives from other organizations actively engaged in preventing and responding to homelessness.

A key priority investment area identified in the plan was the production of deeply affordable and permanent supportive housing given its efficacy as a long-term solution to preventing and ending homelessness and based on the need identified through data analysis and stakeholder input. Consistent with this identified priority, **the City of Baltimore's allocation of HOME-ARP will be directed to rental housing development through the provision of capital subsidies, specifically for the creation of new Permanent Supportive Housing inventory** designed to meet the needs of qualifying populations with the highest housing and service needs. To ensure access for members of the qualifying population with the greatest housing and services needs, a preference will be established for referrals from the CoC's Coordinated Access System to the Housing Authority of Baltimore City. Additional referrals will be received from the project-based voucher waiting list of the Housing Authority of Baltimore City as well as project level waiting lists managed by the HOME-ARP project owner/property manager.

Pending approval from HUD, the City of Baltimore Department of Housing and Community Development, in coordination with the Mayor's Office on Homeless Services, will develop and



administer a competitive award process to solicit projects to fund through the HOME-ARP program, working in collaboration with the Housing Authority of Baltimore City.

Per HUD regulations, all HOME-ARP funds must be spent by 2030. Because of the overwhelming need for this housing, the City of Baltimore plans to operate on an accelerated timeline, leveraging other complimentary funds alongside HOME-ARP to best support project needs. The City aims to obligate all funds by 2024 with all expenditures occurring by 2026.

Consultation

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

In 2021, Baltimore City began developing a Strategic Investment Plan which was directly informed and guided by robust community engagement activities intentionally designed to solicit feedback from a diverse group of stakeholders, including the Continuum of Care (CoC) and its Lived Experience Advisory Committee and Youth Action Board, MOHS staff, nonprofit service providers, housing developers and operators and government agency partners. While the scope of the Strategic Investment Plan was broad and intended to understand priority needs across the housing and homelessness system, the City utilized this process to identify the best use of HOME-ARP funds, based on the eligible activities this new resource could fund. The below summarizes the methods used and dates of consultation:

Key Interviews

July 2021 – February 2023: 22 interviews were conducted over the course of the planning process to solicit input on community priorities and needs, identify sources and collect data, and discuss the best use of HOME-ARP funds to impact the qualifying populations. Interviewees included leaders within the community, City Departments, homelessness services and housing providers, advocates, and people with lived experiences of homelessness and housing instability. A list of all interviews and dates are included in the appendix.

Listening Sessions:

Eleven listening sessions were conducted during the planning process that focused on specific topics aimed to solicit a deep understanding of the needs of the qualifying populations and the best use of funds to address these needs:

September 2021: MOHS held a series of Listening Sessions with community partners and stakeholders and held dedicated sessions with the Baltimore City Continuum of Care's Lived Experience Advisory Committee and Youth Advisory Board. More than 100 people received invitations to participate in the Community Listening Sessions and a total of 25 people participated in one or more of those sessions. Dates and topic areas are listed below:



- 9/14/21 Community Listening Session: Improving Supply and Access to Housing that People Can Afford in Order to Exit Homelessness
- 9/14/21 Community Listening Session: Reducing Unsheltered Homelessness
- 9/15/21 Community Listening Session: Strengthening Crisis Response and Sheltering Activities and Capacity
- 9/15/21 Community Listening Session: Improving Supply and Access to Housing that People Can Afford in Order to Exit Homelessness
- 9/16/21 Community Listening Session: Reducing Unsheltered Homelessness
- 9/16/21 Community Listening Session: Strengthening Crisis Response and Sheltering Activities and Capacity
- 9/17/21 Listening Session with Lived Experience Advisory Committee (LEAC)
- 9/21/21 Listening Session with Mayor's Office of Homeless Services staff
- 9/21/21 Listening Session with Youth Advisory Board (YAB)

December 14, 2021: To further solicit input on the use of HOME-ARP and other potential investments for deeply affordable and supportive rental production, DHCD and MOHS held a “PSH Pipeline Dialogue” virtual meeting with affordable and supportive housing developers and owners working in the City. More than 40 community partners and stakeholders were invited to participate, 20 attended.

December 12, 2022: Listening session held with housing developers to provide update on HOME-ARP and other Strategic Investment Plan initiatives and solicit input on the potential design of the HOME-ARP and other capital funding programs to support deeply affordable and supportive housing development.

Online Surveys

September-December 2021: On-line surveys were distributed to people invited to the Community Listening Sessions (generating 26 responses), to LEAC and YAB members (generating 8 responses), and MOHS staff (generating 16 responses) to seek input to help guide decisions regarding prioritization among the ideas generated through the listening sessions. A survey was also administered following the PSH Dialogue (generating 13 responses) to help identify interest and capacity to increase production of deeply affordable and supportive housing.

Continuum of Care Engagement

Throughout the process the CoC Board and committees were engaged. Specifically, Board members were included on the Core Leadership Team and the CoC updated regularly, the Lived Experience Advisory Committee and the Youth Action Board participated in focused listening sessions, and the CoC Housing Committee (8/30/22, 9/13/22, 10/25/22, 11/29/22) and Board have been consulted with and updated on the HOME-ARP plan development (most recently on



2/2/23). The CoC also served as an important partner in marketing the listening sessions and surveys and other opportunities to provide input and participate in the planning process.

Core Leadership Team/Baltimore Housing and Homelessness Leadership Committee

September 2021- Present: The investment ideas that were generated through those processes were discussed with a 14-person Core Leadership Team that was formed to guide the implementation of this Strategic Investment Planning process comprised of City staff, Continuum of Care leaders, people with lived expertise of homelessness, and representatives from other organizations actively engaged in responding to homelessness in Baltimore. Discussion of the investment ideas generated, and surveying of the Core Leadership Team, resulted in prioritizing HOME-ARP funds to expand the supply and improve access to affordable, quality housing options using capital investments. Upon completion of the Strategic Investment Plan, the Core Leadership Team was transitioned to a more formal committee charged with implementation. This Committee continues to meet and has established working groups to oversee the activities and investment strategies identified.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
CONTINUUM OF CARE			
LEAC (Lived Experience Advisory Committee)	CoC - Lived Experience Advisory Committee	Interview, Core Leadership Team	See Appendix (Key Interview Feedback in SIP, Attachment A)
Continuum of Care Board	Continuum of Care	Meeting	Participants were interested in engaging in future conversations expanding the city's development portfolio to include non-LIHTC projects. Participants were also interested in continued and improved system coordination.
CoC Housing Committee	Continuum of Care	Listening Session, Regular updates and engagement at meetings	
HOMELESS SERVICE PROVIDERS			



Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
St Vincent de Paul	Homeless Services & At Risk of Homelessness	Attended Listening Session/PSH Pipeline Dialogue/Interview	See Appendix (Key Interview Feedback, Listening Session Feedback in SIP, Attachment A; Pipeline Dialogue Feedback is on Page 10 of SIP)
Healthcare for the Homeless	Homeless Services Provider	Interview	
Women's Housing Coalition	Homeless Services Provider	Attended Pipeline Dialogue	
Project PLASE	Homeless Services	Attended Listening Session/Interview	See Appendix (Key Interview Feedback, Listening Session Feedback in SIP, Attachment A; Pipeline Dialogue Feedback is on Page 10 of SIP)
Sarah's Hope Family Shelter	Homeless Services	Attended Listening Session	
The NEST	Homeless Services	Attended Listening Session	



Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
At Jacob's Well	Homeless Services	Attended Listening Session and Pipeline Dialogue	
Greenspring Men's Shelter	Homeless Services	Attended Listening Session	
Health Care for the Homeless	Homeless Services	Attended Pipeline Dialogue, Core Leadership Team	
Helping Up Mission	Homeless Services	Attended Pipeline Dialogue	
Associated Catholic Charities	Homeless Services, At Risk of Homelessness	Attended Pipeline Dialogue, Core Leadership Team	
St. Ambrose Housing Aid Center	At Risk of Homelessness	Attended Pipeline Dialogue	See Appendix (Key Interview Feedback, Listening Session Feedback in SIP, Attachment A; Pipeline Dialogue Feedback is on Page 10 of SIP)



Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
DOMESTIC VIOLENCE GROUPS			
ROAR (Rebuild, Overcome, and Rise)	DV & Crime Victims Service Provider	Interview	Top need from their clients is safe, affordable housing in areas that they want to live. The lack of affordable housing stock limits their choice and keeps them in dangerous situations. Additional need is service coordination and site-based supportive services to help their clients manage their care.
House of Ruth Maryland	DV Service Provider	Attended Listening Session, Core Leadership Team, CoC Board	HRM provided data indicating need for housing for their client population. Priority need for their population is safe, stable affordable housing options that range in terms of intensity of associated services. They also have some need for eviction prevention and financial assistance because they often have high levels of debt due to behavior of abusive partners. While there is some need for emergency shelter and rental assistance, the highest need among eligible activities for HOME-ARP funding is development of affordable rental housing.
VETERANS' GROUPS			
Veterans Affairs Hospital	Veterans Services	Interview	PSH units for single adult males is the highest



BALTIMORE CITY
DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			need among the veteran population. There are currently more vouchers than available units. The process for getting units inspection is lengthy and units often fail inspection at least once. Housing stock is not safe or accessible or is not affordable. Many of the veterans currently experiencing homelessness are older (55-70) and may soon age out of independent living as this population is impacted more rapidly/severely than the civilian population.
PUBLIC HOUSING AGENCY			
Housing Authority Baltimore City	Public Housing Authority	Interviews, also attended PSH Dialogue	HABC provided data on their capacity and waitlists to inform the needs assessment and gaps analysis. The wait list for their subsidized housing programs are all extensive. HABC also expressed interest in partnering to ensure HOME-ARP funds would be utilized in the most efficient and effective way possible to serve the highest need populations in Baltimore.
PUBLIC AGENCIES THAT ADDRESS THE NEEDS OF QUALIFYING POPULATIONS			



Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Mayor's Office of Homeless Services	Public Agency – Homeless Services	Attended Pipeline Dialogue, Core Leadership Team, and Listening Session	See Appendix (Key Interview Feedback, Listening Session Feedback in SIP, Attachment A)
Baltimore Mayor's Office of Children and Family Success (MOCFS)	Public Agency - Rental Assistance Provider	Interview, Core Leadership Team	
Baltimore City Health Department	Public Agency - Services Provider	Interview, Core Leadership Team	
Health and Human Services	Public Agency	Core Leadership Team	See Appendix (Key Interview Feedback, Listening Session Feedback in SIP, Attachment A)
Baltimore City Department of Finance	Public Agency	Core Leadership Team	
Behavioral Health System Baltimore (BHSB)	Behavioral Health	Attended Listening Session	



Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
People Encouraging People	Behavioral Health	Attended Listening Session and Pipeline Dialogue	
Baltimore Police Department	Law Enforcement Agency	Interview	
PUBLIC AGENCIES OR ORGANIZATIONS THAT ADDRESS FAIR HOUSING, CIVIL RIGHTS, THE NEEDS OF PERSON WITH DISABILITIES			
Baltimore Metropolitan Council	Fair Housing	Interview	There are significant racial disparities in housing options and availability as well as an overall lack in housing stock. Currently there is a gap in fair housing representation for units below market rent. There is a need for safe, quality housing stock.
Disability Rights Maryland	Disability Advocacy	Interview	There are barriers due to criminal and institutional settings histories that prevent people from accessing safe housing. There is a significant lack of deeply affordable housing and the stock that is available is poorly regulated. The housing stock is not accessible for persons living with many disabling conditions and is not in close proximity to



Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			resources or transportation. Finding housing for persons is often directly tied to an agency's relationship with individual landlords.
Homeless Person Representation Project	Legal Services	Interview/Attended Listening Session, CoC Board Member	See Appendix (Listening Session Feedback in SIP, Attachment A)
AIDS Interfaith Residential Services (AIRS)	Affordable Housing serving people with disabilities	Attended Pipeline Dialogue	See Appendix (SIP Report)
Public Justice Center	Legal Services: Fair Housing	Interview	See Appendix (SIP Report)
OTHER ORGANIZATIONS THAT ADDRESS THE NEEDS OF QUALIFYING POPULATIONS			
Volunteers of America – MidAtlantic Development	Nonprofit Affordable Housing Developer	Attended Pipeline Dialogue	There is a need for Innovative financing models that support expanded pipeline of permanent housing units in development, including acquisition and pre-development financing. Also a need for more intensive, higher quality services within PSH to better support client population's housing stability and success. See Appendix (SIP Report)
Rebuild Metro	Non-profit developer	Attended Pipeline Dialogue	
Homes for America	Nonprofit Housing Developer	Attended Pipeline Dialogue	
Weinberg Foundation	Philanthropic Organization, Funders Together to End Homelessness	Interview, Core Leadership Team, Listening Session	
Downtown Partnership	Community Services	Interview	



Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Marian House	Recovery Housing and Supportive Services	Attended Pipeline Dialogue	
Family Recovery Program	Supportive Housing/Reunification	Attended Pipeline Dialogue	
Henson Development	Housing Developer	Attended Pipeline Dialogue, Core Leadership Team	
McCormack Baron Salazar	Housing Developer	Attended Pipeline Dialogue	
AHC of Greater Baltimore	Affordable Housing Developer	Attended Pipeline Dialogue	
Enterprise Community Development	Affordable Housing Developer	Attended Pipeline Dialogue	
Episcopal Housing Corporation	Affordable Housing Developer	Attended Pipeline Dialogue/Interview	
Mission First	Affordable Housing Developer	Attended Pipeline Dialogue	
Community Housing Associates	Affordable Housing	Attended Pipeline Dialogue	
Dayspring Programs	Affordable Housing	Attended Pipeline Dialogue	There is a need for Innovative financing models that support



Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Unity Properties (Bon Secours)	Affordable Housing	Attended Pipeline Dialogue	expanded pipeline of permanent housing units in development, including acquisition and pre-development financing. Also a need for more intensive, higher quality

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

Throughout the consultation process, stakeholders identified gaps and needs within the system, generated ideas to meet those needs, and provided both high level and detailed feedback on what was working and what was needed in order to guide investment strategies. The feedback received and results are summarized below:¹

Gaps and needs identified centered around the following themes:

- Access to affordable units is a primary challenge, including the need for new inventory that meets the needs of the qualifying populations as well as increased access to existing units; inventory is low quality and there is a lack of accessible units for people with mobility or physical disabilities; housing available and current landlord strategies do not optimize choice and community integration
- Need for scale and fidelity across all interventions, especially permanent supportive housing and rapid rehousing; the scale of permanent supportive housing does not meet the need
- Need to expand focus on diversion and prevention strategies to prevent homelessness and stabilize households; diversion and prevention efforts are not robust or coordinated enough across the housing and services system
- More purposeful and proactive approaches to addressing encampments and unsheltered homelessness in the City needs to be developed, visibility of homelessness is increasing, outreach efforts have been strained by pandemic, concern that criminalization of homelessness will return as the public health emergency ends

¹ Extensive documentation of feedback received through the consultation process can be found in the Strategic Plan Investment Progress Report (November 2021) and the Strategic Investment Plan (March 2022), linked within this plan and attached as an appendix.



- Need a concerted effort to rehouse people out of non-congregate shelters/hotels; collaboration around establishment of non-congregate shelters viewed as a success, but concern that efforts to rehouse individuals living in hotels has not been pursued as urgently
- Need to transform approach to emergency shelter in terms of orientation to quality practices and focus on housing outcomes; most people interested in conversion of hotels to permanent housing rather than non-congregate shelter or interim housing

Ideas generated to address these gaps and needs of the qualifying populations centered around three high level topic areas, summarized below:

- Improving supply and access to housing people can afford to exit homelessness:
 - Pursue innovative financing models that support and expanded pipeline of permanent housing units in development, including acquisition and pre-development financing
 - Support more intensive and higher quality services within permanent housing programs
 - Increase centralization and coordination of service strategies that support people through the housing stabilization process, such as navigation, coordinated entry, and flexible assistance to address housing barriers in order to increase access to units and speed up the rehousing process
- Reducing unsheltered homelessness
 - Restore and expand basic services and increase street outreach and engagement
 - Provide non-congregate shelter options that are low barrier and welcoming
 - Integrate rapid resolution services, bridge housing, and direct to permanent housing strategies for people living in encampments and unsheltered locations
- Strengthening crisis response and sheltering activities and capacity
 - Enhance case management, housing navigation services and connections with mainstream services such as legal services and health (behavioral, medical, and substance use) services

Based on the gaps and needs identified and the ideas generated through the consultation process, priority investments for one-time funding were identified through online surveys and discussions with the Core Leadership Team. Overwhelmingly and across stakeholder types, increasing permanent housing options and making housing access faster and easier was identified as the highest priority.

Given the eligible activities for HOME-ARP and within the context of other ARPA funding and existing resources, consulted stakeholders recommended utilizing HOME-ARP to support the development of new quality and deeply affordable and supportive rental housing. Therefore, the



City of Baltimore's allocation of HOME-ARP will be directed to rental housing development through the provision of capital subsidies, specifically for the creation of new Permanent Supportive Housing inventory designed to meet the needs of qualifying populations with the highest housing and service needs. To ensure access for members of the qualifying population with the greatest housing and service's needs, a preference will be established for referrals from the CoC's Coordinated Access System to the Housing Authority of Baltimore City. Additional referrals will be received from the project-based waiting list of the Housing Authority of Baltimore (HABC) as well as the project level waiting lists managed by the HOME-ARP project owner/property manager, so that no members of the qualifying populations will be excluded. DHCD, in partnership with MOHS, HABC, and the CoC will explore coordinated strategies for soliciting and funding projects that will produce high quality affordable and supportive rental housing that meets the unique housing and services needs of the population.

Public Participation

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

- ***Date(s) of public notice: 2/9/23***
- ***Public comment period: start date – 2/27/23 end date - 3/28/23***
- ***Date(s) of public hearing: 02/23/2023***

Describe the public participation process:

On February 9th, Baltimore City Department of Housing and Community Development issued a notice of public hearing regarding the draft of the HOME-ARP Allocation Plan. A Public Hearing on the draft plan was held on February 23rd, 2023 at 6:00PM. The meeting was held in-person with the option to join virtually via Zoom. During the hearing, an overview of the HOME-ARP program was provided and a high-level review of the data analysis, results of stakeholder consultation, and allocation strategy was presented. Participants also were informed of how they could provide comments through the 30-day public comment period. Participants in attendance had the opportunity to ask questions and provide comments, either in person or virtually via the chat feature of Zoom. On February 27th, the draft plan was posted online and the public comment period was opened so any resident of Baltimore could make comments on the contents of the draft plan using an online form hosted on the DHCD website. The entire draft plan was available throughout the entire public comment period. All comments were reviewed and considered by DHCD staff as detailed below. A copy of the public hearing notice and presentation at the hearing are included in the Appendix.

Describe efforts to broaden public participation:



A community notice and press release informing the public of the Public Hearing were posted on the DHCD website and sent to the Baltimore Sun for publication on February 9th. The notice was also sent out to the full DHCD contact list which includes 21,248 subscribers including developers, program participants, legislators, open bid notice followers, previous DHCD workshop participants, and others. Notice of the hearing was also sent via the CoC listserv, which includes 895 individuals. The draft plan and comment form was available on the DHCD website beginning February 27th, 2023 and shared via the listservs above as well as individuals who registered for the public hearing.

Accommodations for persons with disabilities and those with limited English proficiency were also available for both the draft HOME-ARP Allocation Plan and the public hearing upon request.

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

During the public hearing, there was broad support for the plan. Nearly every comment made echoed the need for housing to address long-term homelessness and affirmed the plan to use HOME-ARP funds for this purpose. Additional comments included clarifying questions related to the type of housing that will be constructed with the funds, and the process of the HOME-ARP approval and funds dispersal. These questions included eligibility of various populations, logistical questions about how funds will be disbursed, and quality standards for housing produced by the plan.

During the 30 day public comment period, there were nine total comments received via the online portal. All of the comments received in the public comment period are included at the end of this document. The form asked commenters directly if they support the plan. Five commenters answered “Support”, three answered “Support with Reservation” and one answered “Don’t Support.” The “Don’t Support” comment is addressed in the next question.

Two of the “Support with Reservation” comments were two identical comments from the same person, submitted twice. The comment spoke to challenges receiving DHCD funding but approved of the use of funds to serve people currently experiencing homelessness, so no changes to the plan were necessary based upon this comment.

The third “Support with Reservation” comment supported the use of HOME-ARP funds for development of Permanent Supportive Housing (PSH) with preference for people experiencing long-term homelessness. The commenter had a question about the shelter data in the gaps analysis, and language was updated in the analysis section of this plan to make those specific points clearer. The commenter also expressed reservations concerning quality standards for the housing produced by HOME-ARP funds, calling out a need for Baltimore to define and standardize quality across PSH development and services system-wide. This commenter stated



the importance of using Housing First principles in referral to PSH units generally and abiding by Fair Housing standards, as well as other pieces relevant to the specifics of the dispersal of funds and the evaluation of applications for funding. They also expressed concerns about coordination and lack of alignment between different systems related to housing and homelessness in Baltimore, specifically a lack of communication between the Mayor's Leadership Committee (comprised of DHCD and MOHS) and the local CoC. The City of Baltimore met with this commenter in a virtual meeting to discuss all these comments and address concerns directly. The meeting clarified that CoC Housing Committee, DHCD, and MOHS were all key partners in creation of both the Strategic Investment Plan and HOME-ARP Allocation plan, and representatives from DHCD and MOHS presented these plans to the CoC Board and received positive feedback, as detailed in the stakeholder consultation section of this plan. No substantial changes to the plan were necessary after this conversation, though the parties committed to ongoing conversation as the competitive funding application and fund dispersal process for HOME-ARP are further developed, and opportunities for system-wide standardization improvements arise.

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

During the public hearing there was one comment encouraging the City of Baltimore to utilize funds for ADUs for special subpopulations that are not one of the Qualifying Populations (such as urban farmers). There were also comments and questions outside the scope of the HOME-ARP plan, such as a question about how to support a tenant in need of immediate housing assistance. Presenters addressed the questions directly and explained why the comments were not relevant to the plan presented.

In the public comment period, one commenter answered that they "Don't Support" the plan. This commenter stated they preferred funds be used to serve populations that are not Qualifying Populations or be used for activities that are not Eligible Activities.

Needs Assessment and Gaps Analysis

A comprehensive needs assessment and gaps analysis were conducted to identify how to most efficiently and effectively disburse the HOME-ARP funds allocated to the City of Baltimore. The following summary describes the size and demographic composition of each of the Qualifying Populations within the borders of the City of Baltimore, outlines the existing resources available to meet the housing and service needs of each Qualifying Population, and identifies the gaps that exist between existing need and available resources. A variety of data sources were consulted in the course of this analysis, which are listed below, and all data were combined with findings from the stakeholder engagement process to draw conclusions about how to allocate HOME-ARP funds to have the greatest impact.



The following tables, provided by HUD for use in HOME-ARP Allocation plans, with data collected locally for Baltimore City, provide a high-level snapshot of the inventory and gaps of the qualifying populations experiencing and at risk of homelessness.

Table 1: Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	321	73	1198	#	68								
Transitional Housing	144	50	802	#	258								
Permanent Supportive Housing	1399	462	1718	#	742								
Other Permanent Housing	1183	353	655	#	0								
Sheltered Homeless						101	1151	139	52				
Unsheltered Homeless						0	123	6	8				
Current Gap										#	(22)	(726)	#

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

Gap Calculations:

of Family Units = ES/TH Units (123) – Homeless Families (101) = -22

of Adult Beds = ES/TH Beds (2000) – Homeless Adults (1274) = -726

Table 2: Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households



Total Rental Units	126,752		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	27,761		
Rental Units Affordable to HH at 50% AMI (Other Populations)	63,883		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		34,935	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		15,905	
Current Gaps			50,840*

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

*Current Gap calculated as Level of Need for 0-30% AMI HHs plus Level of Need for 30-50% AMI HHs (34,935+15,905)

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

Homeless as defined in 24 CFR 91.5

Table 1 above reports the results of the 2022 Point in Time Count in the City of Baltimore, measuring the count of people experiencing sheltered and unsheltered homelessness on a single night in 2022. Because this count is only for a single night, it obscures the true size of the population experiencing homelessness in Baltimore. To create a more comprehensive description of the size and demographics of the population experiencing homelessness in Baltimore, the following analysis uses LSA data tabulated in the Stella P platform. Stella P is a tool administered by HUD that puts data reported by the Continuum of Care through several rounds of authentication and produces a variety data visualizations and metrics to aid in the analysis of the entire homeless services system in the jurisdiction. The following data reported by the Baltimore City Continuum of Care, collected from the Stella P database describes the size and demographic characteristics of the population experiencing homelessness in Baltimore more accurately and descriptively than the Point in Time Count.

In the reporting period from 10/1/2021 to 9/30/2022, the City of Baltimore served 3,308 total people in emergency shelter and transitional housing. This total includes 2,552 Adult Only Households (HHs), 169 HHs with Children, and 2 Child Only HHs.

Figure 1 below shows the race and ethnicity of the households experiencing homelessness in Baltimore. As seen in the figure, the largest group represented for both Adult Only HHs and HHs with Children is Black or African-American.

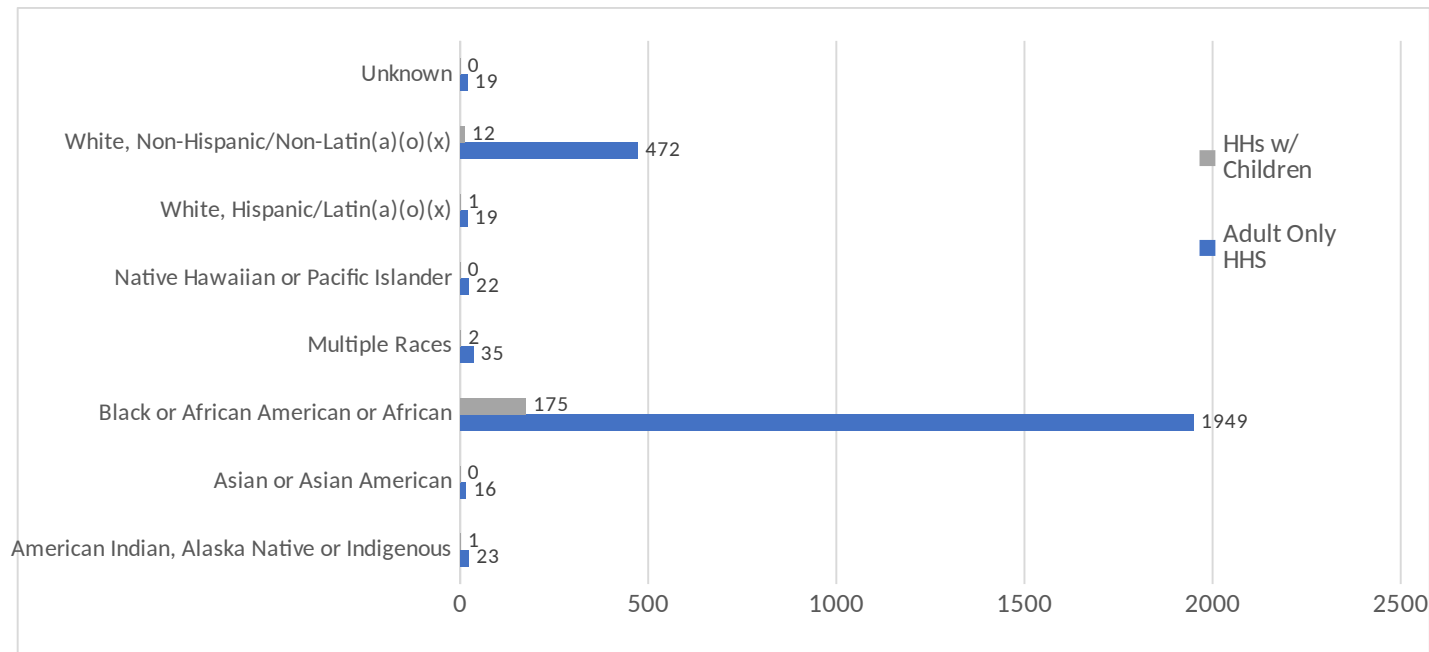


Figure 1: Race and Ethnicity of People Experiencing Homelessness in Baltimore
Source: Stella P (Reporting Period 10/1/21-9/30/22)

Figure 2 below compares the racial demographics of the population experiencing homelessness in Baltimore with the racial demographics of the general population of Baltimore. As shown in the figure, there is a disproportionately higher representation of people who are black in the population experiencing homelessness compared to the general population. 62% of the general population is black but 74% of the population experiencing homelessness is black. On the other side, 30% of the general population is white but only 22% of the population experiencing homelessness is white, so there is an underrepresentation of people who are white in the population experiencing homelessness.

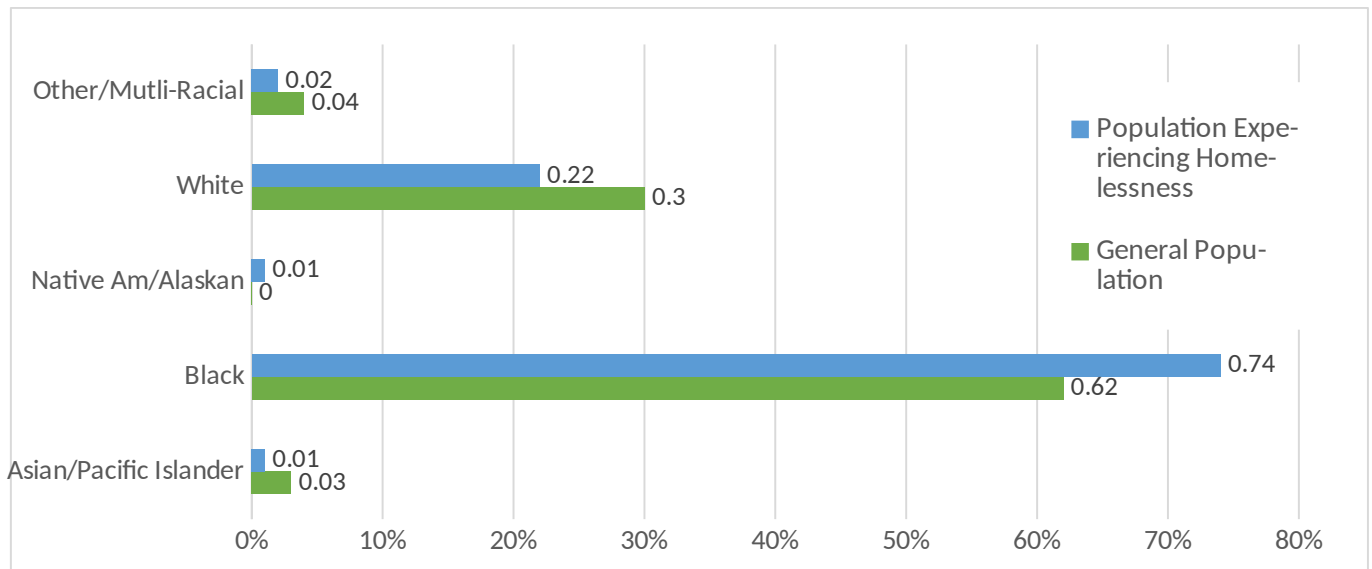


Figure 2: Racial Demographics of the Populations Experiencing Homelessness vs. Racial Demographics of General Population

Sources: ACS, CoC Racial Equity Analysis Tool, Stella P (Reporting Period 10/1/21-9/30/22)

Of the people experiencing homelessness in Baltimore, 1740 are male, 962 are female, 4 no single gender, 1 questioning gender, and 23 transgender. This is a slight overrepresentation of males compared to the rest of the population (Source: Stella P).

There is also overrepresentation of veterans in the population experiencing homelessness. 14% of people experiencing homelessness in Baltimore reported themselves to be veterans, but veterans make up 5.5% of the general population (Source: ACS, Stella P).

Figure 3 below shows the household composition of the homeless population in Baltimore. As shown in the figure, 93% of those households are 1-person households.

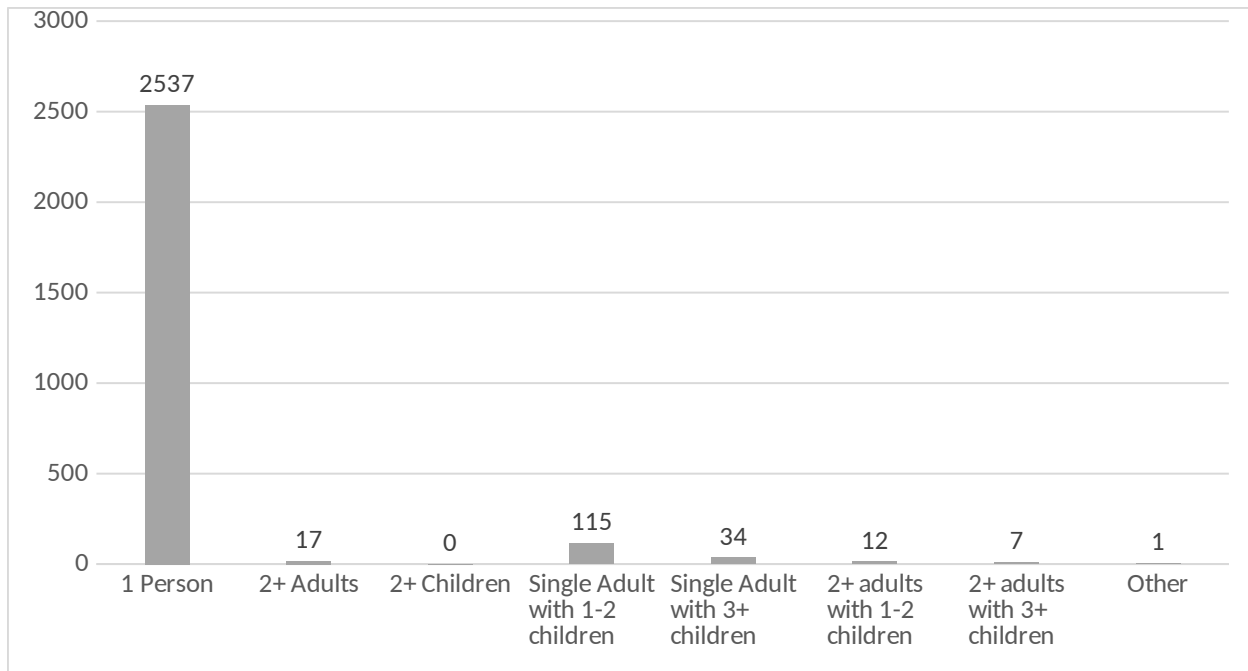


Figure 3: Household Composition of Population Experiencing Homelessness

Source: Stella P (Reporting Period 10/1/21-9/30/22)

Finally, 25% of HHs with Children experiencing homelessness in Baltimore are experiencing Chronic Homelessness, and 35% of Adult Only HHs experiencing homelessness in Baltimore are experiencing Chronic Homelessness (Source: Stella P).

At Risk of Homelessness as defined in 24 CFR 91.5

The size and demographics of the population at risk of homelessness in Baltimore is estimated using the Comprehensive Housing Affordability Strategy (CHAS) data. CHAS is a special tabulation of American Community Survey data that measures various housing concerns such as cost and condition of housing in a certain geographic area.

The Area Median Income in Baltimore is \$116,100, so an Extremely Low-Income (ELI) Household in Baltimore has income at or below \$34,850. There are an estimated 65,720 ELI HHs in Baltimore, 49,575 of which are renter households.

Among those 49,575 ELI renter households, it is estimated that 70% of them have at least 1 housing problem. These housing problems are defined as incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burden greater than 30%. Furthermore, 69% of ELI renter households are cost-burdened and 55% are severely cost-burdened (Source: CHAS 2015-2019).



These ELI households with inadequate housing and either cost burden or severe cost burden are all at risk of homelessness. This data set does not offer specific breakdowns by race or other demographic group. However, American Community Survey Data reports median household income for HHs of different race and ethnicity. Table 3 below shows median HH income for different racial and ethnic groups. As noted in the table, the median income for American Indian/Alaskan Native and Black/African American HHs is the lowest of all groups, suggesting these groups are highly represented in the population of HHs at risk of homelessness.

Table 3: Median Household Income by Race/Ethnicity

White, not Hispanic/Latino	\$84,043
Hispanic/Latino (any race)	\$62,698
Black/African American	\$42,493
American Indian/Alaskan Native	\$42,125
Asian	\$65,039
Other single race	\$59,905
Two or more races	\$65,085

Source: ACS 5-Year Estimates 2021

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

House of Ruth Maryland (HRM) is the lead provider of housing and supportive services for people fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking in Baltimore. In FY2021, HRM served 6,455 adults and 424 children across all their jurisdictions. In the City of Baltimore specifically, they served 173 Households in Emergency Shelter/Transitional Housing, and 131 households in temporary hotels. They also served 85 households in Rapid Rehousing although those households were sometimes housed outside of the city limits of Baltimore.

Table 4 below shows some demographic characteristics of these households served, including gender, race/ethnicity, marital status, and employment status, as reported from House of Ruth Maryland.

Table 4: Demographic Composition of HHs fleeing DV

Female	76%
Male	24%
Black	72%
White	7%



Asian	2%
Hispanic	12%
Single	79%
Married	8%
Domestic Partner	5%
Employed (at entry)	14%
Unemployed (at entry)	24%
Never Worked (at entry)	42%

Source: House of Ruth Maryland (Reporting Period FY2021)

Stella P, the database described above, reports that 5% of HHs experiencing homelessness in Baltimore (149 households) have a head of household that is a survivor of domestic violence and currently fleeing. A further 12% (330 HHs) have a head of household who is a survivor of domestic violence but either not currently fleeing or unknown fleeing status. Further demographic characteristics of this population are not available. (Source: Stella P, reporting period 10/1/21-9/30/22)

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice CHAS data shows that across all income bands, there are challenges with cost burden among households in Baltimore, specifically renter households. **Table 5** below shows cost-burden data for renter households in Baltimore. **Table 6** shows housing problems by income among renters in Baltimore.

Table 5: Cost Burden by Income

Income Band (Renters Only)	Cost Burden	Severe Cost Burden	Total # of Renter HHs
Household Income <= 30% AMI	34,355 (69% of ELI renters)	27,195 (55% ELI renters)	49,575
Household Income >30% to <=50% AMI	15,445 (69%)	3,970 (18%)	22,355
Household Income >50% to <=80% AMI	6,290 (28%)	715 (3%)	22,175



Household Income >80% to <=100% AMI	1,355 (14%)	40 (0%)	9,630
Household Income >100% AMI	425 (2%)	10 (0%)	21,795
Total	57,870 (46% all renters)	31,930 (25% all renters)	125,530

Source: CHAS (2015-2019)

Table 60: Renters with Housing Problems

Total Renter Households	125,530
Renters with at least 1 housing problem	60,645 (48% of all renter HHs)
Renters with at least 1 severe housing problem	35,780 (29% of all renter HHs)
VLI Renter Households (Income 30% - 50% AMI)	22,355
VLI Renter Households with at least 1 housing problem	15,905 (71% of VLI renter HHs)

Source: CHAS (2015-2019)

These cost burden and housing problem rates suggest much of Baltimore's population requires services or housing assistance to prevent homelessness.

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

The resources for people experiencing homelessness in Baltimore, as reported in 2022 Housing Inventory Count are:

- 1,519 total year-round shelter beds
- 60 seasonal beds
- 946 Transitional Housing beds
- 33 Safe Haven beds
- 3,117 Permanent Supportive Housing beds
- 538 Rapid Re-Housing beds
- 1,838 Other Permanent Housing beds

In addition, there are housing resources for all QPs, such as:

- 6,778 Public Housing Units
- 20,561 Housing Choice Vouchers and Emergency Housing Vouchers
- 27,761 housing units affordable to available to Extremely Low-Income renter households

Despite these resources, there remain significant gaps in meeting the housing needs across all qualifying populations, especially those experiencing and at risk of homelessness.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Comparison of the Housing Inventory Count and Point In Time Count data reported in 2022 suggests that there is a surplus of emergency shelter availability (see **Table 1** above). However this obscures the true need for shelter because it relies on the Point in Time Count, which is a strong undercount of actual population experiencing homelessness. Stakeholder consultation suggests there is need for shelter, although it was not the top priority.

Instead, the most vocalized unmet need for the population experiencing homelessness in Baltimore was permanent safe, affordable housing. There is an estimated gap of 1,194 Permanent Supportive Housing (PSH) units needed for individuals in Baltimore and 29 PSH units for families. These numbers come from a modeling tool created by CSH, a national organization that works to advance quality supportive housing solutions in an effort to eradicate homelessness. This modeling tool considers assumptions about PSH need based upon national data. These figures match the gaps estimated by the 2022 Strategic Investment Plan produced by the Baltimore Mayor's Office of Homeless Services. In the Strategic Investment plan, it was estimated that Baltimore needs 531 PSH units for families and 789 units for Individuals. The disparity in these estimates for families is due to differing methodologies and data sources. For example, the CSH Modeling tool uses the Point in Time Count to estimate total number of people experiencing homelessness while the Strategic Investment Plan used HMIS data. The consistent takeaway from these data sources is that the main unmet housing and services need for this QP is Permanent Supportive Housing.

There was also some feedback in the stakeholder engagement articulating a need for centralized landlord engagement and housing navigation strategies to help people experiencing homelessness enter housing more quickly. Combined with expanded permanent housing options, this enhanced referral and navigation services would more completely meet the needs for this QP.

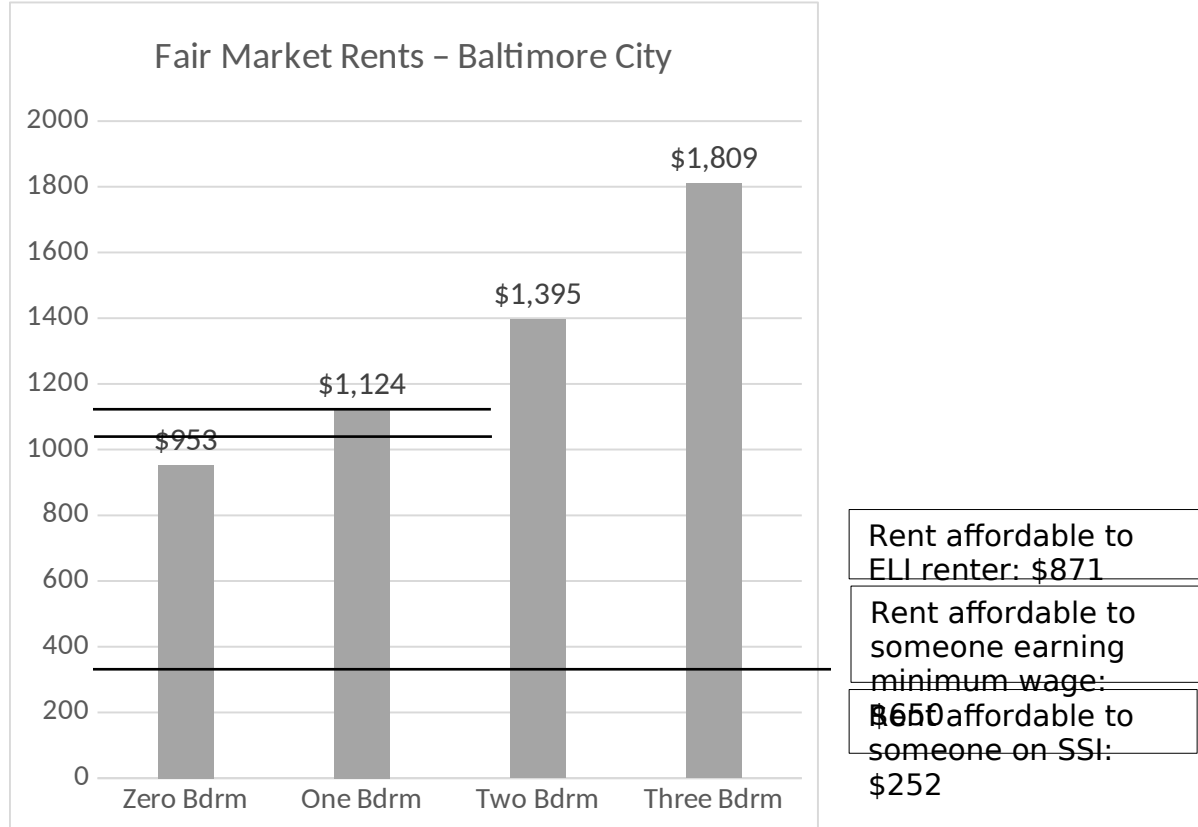
At Risk of Homelessness as defined in 24 CFR 91.5

In the narrative above, it was clear that extremely low-income households in Baltimore experience high rates of cost burden (69%) and housing problems (70%), demonstrating that there is an unmet need for housing that is safe, high quality, and affordable to this population (Source: CHAS).

There are an estimated 49,575 ELI renter households in Baltimore but only 27,761 housing units affordable to this population. This leaves a gap of 21,814 units needed (Sources: ACS and CHAS)

Figure 4 below shows the rents affordable to different low-income populations in Baltimore compared to Fair Market Rents. This graph clearly shows that rent on the private market is too expensive for low-income renters in Baltimore, especially for larger households that require larger units.

Figure 4: Fair Market Rents in Baltimore City



Source: NLIHC OOR Report 2022

Finally, while there are housing resources available to this QP to help subsidize rents on the private market, such as public housing and housing choice vouchers, existing resources are not enough to meet the need. The Housing Authority of Baltimore City operates 6,778 Public Housing units, 3,745 Rental Assistance Demonstration (RAD) units, and 20,561 Housing Choice Vouchers (HCVs).



Utilization rates for all programs are high -- 93% occupancy in Public Housing and 84% HCV utilization – indicating existing resources are at capacity. Furthermore, waitlists for both HCVs and Public Housing are closed. The HCV waitlist has 7,693 households, 93% of which are waiting for 0- or 1-bedroom units. Taken together, all these data demonstrate that the most serious unmet need for the at risk of homelessness QP is availability of affordable housing. (Sources: HUD HCV, EHV, and Public Housing Dashboards, Housing Authority of Baltimore City)

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

Several needs for this QP were expressed during stakeholder consultation. The most voiced need was safe, stable, affordable housing. Many of the organization serving this QP stated serious safety concerns in their homes, not always related to the intimate partner violence they have experienced. Rather, they expressed fear about violence in their neighborhoods and a lack of choice or ability to move elsewhere due to financial barriers. Furthermore, survivors often have difficulty screening into vulnerability assessment tools because of either confidentiality concerns or a tendency to underestimate the impact of the abusive partner on their safety and wellbeing. Taking these conversations together, the clear unmet housing need for this QP is safe affordable housing located across the city so that each household can have the most choice in their housing decisions.

Another expressed unmet need was for tenancy support services. Consultation with ROAR, a crime victims support organization in Baltimore, spoke about a pattern with their clients where they struggle to access necessary services such as physical healthcare, behavioral healthcare, wellness and emotional supports, and other needs because of the challenge of navigating complex systems. Often, they also have mobility issues that make it difficult for them to access services in the community. House of Ruth Maryland also expressed the need for a spectrum of service options is needed for survivors of domestic violence. Survivors often have physical or mental health disabilities resulting from the abuse and require varying levels of services to support them as they maintain stable housing. In summary, comprehensive supportive services including care navigation and at-home case management would greatly help this population.

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

The unmet needs of this QP are similar to that of the population at risk of homelessness. 69% of HHs with incomes between 30-50% AMI are cost burdened and 71% have at least 1 housing problem (Source: CHAS). The housing market does not produce enough housing affordable to this income group, particularly for larger households who require larger units.



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

To summarize the gaps and unmet needs described above, the most significant gap in the shelter and housing inventory is permanent affordable housing options, specifically permanent affordable housing for individual adults exiting long-term homelessness. There is a need for at least 789 units of Permanent Supportive Housing for individuals and at least 29 units for families, but the gaps could be as high as 1,194 units for individuals and 531 units for families (Sources: Strategic Investment Plan, CSH Modelling Tool).

The gap in availability of permanent affordable housing units for individuals is further confirmed by the data provided by the Housing Authority of Baltimore City. Among the 7,693 households on the waitlist for Housing Choice Vouchers, 7,160 of those are waiting for 0- or 1-bedroom units.

Though there do not appear to be significant shelter gaps, based upon Point In Time Count and Housing Inventory Count data, the stakeholder consultation spoke to the challenging experience accessing shelter beds specifically once pandemic-specific resources expired.

Service delivery system gaps identified in the stakeholder consultation included strategies for addressing encampments and unsheltered homelessness, and need to expand focus on diversion and prevention strategies.

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:

Baltimore does not plan to further refine the definition of “other populations”

Identify priority needs for qualifying populations:

The clear consensus from both data analysis and stakeholder engagement was that the priority need for all QPs is safe, stable, permanent affordable housing. In the community listening session, 76.9% of attendees identified the priority as “increase permanent housing options and make housing access faster and easier.” The same priority was identified by 83.3% of the members of the Lived Experience Advisory Committee and Youth Advisory Board, and 62.5% of the staff at the Mayor’s Office of Homeless Services.

All agencies consulted that serve survivors of domestic violence expressed that the top need is safe, stable, affordable housing with a wide range of supportive services to meet the variety of needs survivors have beyond housing.



Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

The City of Baltimore consulted a variety of data sources in order determine the level of need and gaps in the shelter and housing inventory and service delivery system. These data sources included:

- Stella P (HUD) - (Data visualization of HMIS data)
- American Community Survey (Census Bureau)
- CoC Racial Equity Analysis Tool (HUD)
- Housing Inventory Count and Point In Time Count (HUD)
- Comprehensive Housing Affordability Strategy (CHAS – HUD/Census Bureau)
- GAP Report and Out Of Reach Report (National Low-Income Housing Coalition)
- Corporation for Supportive Housing Modelling Tool
- ESV and HCV Utilization Dashboard (HUD)
- Consultation with organizations such as House of Ruth Maryland, Housing Authority of Baltimore City, and other groups working with QPs
- Stakeholder Consultation (as described in stakeholder engagement section of this plan)

The needs assessment and gaps analysis also drew heavily on the research conducted for the Mayor's Office of Homeless Services Strategic Investment Plan. This plan was published in March 2022 after a multi-year research and community consultation process.

HOME-ARP Activities

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

The City of Baltimore's DHCD will issue a notice of competitive funding opportunity for the development of affordable rental housing in coordination with MOHS, HABC, and the CoC. The solicitation will specify that all HOME-ARP assisted units must be reserved for qualifying populations, with a preference for people identified and prioritized through the CoC's Coordinated Entry System.

The competitive selection process will include consideration for the applicant's experience and capacity to carry out the eligible activities in accordance with HOME-ARP regulations as well as delivering high quality affordable and supportive rental housing and services to the qualifying populations. This will include a consideration for projects that ensure units are affordable to people with extremely low incomes, accessible to people with high barriers to housing and provide tenant centered supportive services according to evidence-based practices.

Describe whether the PJ will administer eligible activities directly:

Baltimore DHCD will fund the development projects selected through the RFP process, and will not be conducting the development of affordable housing directly.

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

N/A

The table below provides the allocation of funding across HOME-ARP eligible activities:

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	0		
Acquisition and Development of Non-Congregate Shelters	0		
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing	\$ 14,374,157		
Non-Profit Operating			5%
Non-Profit Capacity Building			5%
Administration and Planning	\$ 1,081,925	7 %	15%
Total HOME ARP Allocation	\$ 15,456,082		

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

Baltimore will utilize the majority of its HOME-ARP Allocation to provide gap financing for development of Affordable Rental Housing, specifically Permanent Supportive Housing. This funding will be leveraged by other existing resources such as the Low Income Housing Tax Credit Program, Baltimore Affordable Housing Trust Fund and other state, local, and federal funds. Additionally, 7% will be allocated to support administration and planning for the Program.

While HOME-ARP funding will be used for capital financing to develop PSH, services sources are being explored, including the Assistance in Community Integration Services (ACIS) program, as authorized under Maryland's 1115 HealthChoice Waiver. This waiver allows Medicaid funding to be used for tenancy support services for Medicaid beneficiaries. This



program, piloted in 2017, has been successful in meeting the housing needs of Baltimore residents while reducing the utilization of health services such as Emergency Department visits and Inpatient Admissions.

DHCD will work with the Housing Authority of Baltimore City to explore aligning project based rental assistance with HOME-ARP funded projects to ensure affordability for the qualifying populations.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

As discussed above, the gap analysis and stakeholder consultation revealed a significant need for Permanent Supportive Housing. The need is specifically for permanent housing that is affordable to extremely low-income and no-income individual adults experiencing long-term homelessness. Over 90% of the households on the wait-list for HCVs are waiting for 0- or 1-bedroom units, and 93% of the households experiencing homelessness in Baltimore are single-person households. 35% of adult only households experiencing homelessness are experiencing chronic homelessness. Stakeholder consultation indicated a significant need for supportive services within housing to ensure accessibility of services for vulnerable populations and to maintain housing stability. Permanent Supportive Housing is the evidence-based housing intervention that addresses all of the needs and gaps identified.

HOME-ARP Production Housing Goals

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

Total Development Costs for new multifamily housing developed in Baltimore are estimated as \$359,820 per unit, although construction costs continue to grow rapidly and it is expected this figure will be much higher by the time the PJ is soliciting applications for projects to be funded by HOME-ARP. The estimated local investment is \$100,000 per unit, leveraging other state and federal resources to meet total development costs. With these estimates, the available resources could create at least 140 new units of PSH.

Noting the unpredictable development costs and inability to predict the number of projects competing for funding, this goal is only an estimate of what could be produced with HOME-ARP funds. The City of Baltimore is committed to ensuring the highest possible quality of units produced by these funds, and will select projects based upon those quality standards. Should a high-quality project require a local investment of more than \$100,000 per unit, the PJ is willing to provide a higher level of subsidy per unit, resulting in a total unit production number lower than estimated.



Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The Mayor's Office of Homeless Services Strategic Investment Plan, published in March 2022, estimated a need for 1,320 units of Permanent Supportive Housing to meet the needs of people experiencing homelessness in Baltimore. The 140+ units created with HOME-ARP funding will be paired with other local, state and federal sources to meet this larger goal.

Additionally, the City of Baltimore is participating in the federal Housing America initiative, a vision to address the crisis of homelessness through historic investments in housing and expanding the housing pipeline. As part of House America, the city had a goal of housing 1,000 families experiencing homelessness and adding 1,605 units of affordable housing to the development pipeline by the end of 2022. In February 2023, the City announced it had exceeded this goal: housing 1,443 households and adding over 2,500 units of affordable housing to the development pipeline. Building upon this success, the City is working with the Continuum of Care and the Leadership Committee on Housing and Homelessness to develop new goals for 202 and beyond.



Preferences

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:

The housing funded by HOME-ARP will be open to all QPs, but preference will be given to individuals experiencing homelessness, as prioritized through the local Coordinated Access System (CAS). No qualifying populations will be excluded from applying for the housing produced with this funding.

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:

The needs assessment, gap analysis, and stakeholder consultation revealed that the QP subpopulation with the most significant need was households experiencing long-term homelessness with disabling conditions and incomes at or below 15% AMI. Using CAS to prioritize this population will ensure that aid is most efficiently targeted at the group with highest need, who are experiencing significant barriers to safe and stable housing. This addresses a gap in the existing inventory of currently available rental housing by providing accessible, permanent options with the services and supports the population needs to thrive in community.

Referral Methods

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):

HOME-ARP funded properties will be required to utilize referrals from three sources to fill their units: the City of Baltimore's existing Coordinated Access System (CAS), the project-based waiting list of the Housing Authority of Baltimore City (HABC) for the HOME-ARP funded projects, and a project level waiting list managed by the owner/property manager of HOME-ARP funded projects. HOME-ARP funded projects in the City of Baltimore must give preference to referrals from CAS, as noted above. Combined, these three referral sources include all 4 QPs, ensuring no QPs are excluded from access to housing built with HOME-ARP funds.

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



The CAS process utilizes a variety of access points across the city including shelters, interim housing programs, outreach teams, and drop-in centers, among other locations. The standardized assessment through CAS is available to all people experiencing homelessness and all people fleeing or attempting to flee domestic violence (QP 1 & 3). The Housing Authority of Baltimore City serves populations at risk of homelessness and those who require assistance to maintain housing (QP 2 & 4). Referrals from HABC will be added to CAS referrals to ensure that all four QPs are covered in the referral process for projects funded by HOME-ARP.

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):

In order to address priority needs identified in the plan, a preference will be given to referrals from the Coordinated Entry System, known as the Coordinated Access System (CAS) in Baltimore. CAS provides a transparent, comprehensive prioritization and matching of housing resources rooted in addressing the community's need.

First, information is gathered from assessments and used to identify an individualized housing and service intervention best suited to end the household's homelessness. Community prioritization criteria, through HMIS reporting, creates real-time by name lists/priority pools to match clients to PSH and other housing program slots. Prioritization is currently based on the following criteria:

- 1) Chronic Homeless, as defined by HUD
- 2) VI score, in descending order (VI criteria include somatic health issues, mental health, substance abuse, risk, and other protective factors)
- 3) Number of days homeless, in descending order

Once prioritized, referrals to housing units are made. Baltimore's practice is to fill all PSH units with people facing chronic homelessness before other criteria. If no individuals facing chronic homelessness can be found for the unit, the other vulnerability criteria are used. The CAS process is documented through policies and procedures and is regularly reviewed and updated in accordance with HUD regulations.

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):

HOME-ARP funded projects will receive referrals from CAS and HABC, ensuring referral coverage of all QPs. Referrals from the CAS process will be prioritized, with the characteristics of the specific funded project and the client's choice and interests in the available unit considered.

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:

Baltimore does not intend to limit eligibility.

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:

Baltimore does not intend to limit eligibility.

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):

Baltimore does not intend to limit eligibility.



HOME-ARP Refinancing Guidelines

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

The City of Baltimore does not intend to refinance existing debt.

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

N/A

- *Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.*

N/A

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

N/A

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

N/A

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

N/A

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

N/A

Appendix

A. LINKS TO REFERENCE DOCUMENTS:

[Strategic Investment Plan Progress Report - November 2021](#)

[Strategic Investment Plan - March 2022](#)



B. CONSULTATION LISTS - INDIVIDUALS PARTICIPATING

Core Leadership Team - Strategic Investment Plan

Name	Organization
Sonce Reese	CoC Board
Mark Council	Lived Experience Advisory Committee
Janice Miller	CoC Board
Shawn Jones	CoC Board
Amy Collier	Catholic Charities
Amy Kleine	Weinberg Foundation
Dana Henson	Henson Development
Kevin Lindamood	Health Care for the Homeless
Faith Leach	Mayor's Office of Children and Family Success
Director Bob Cenname	Department of Finance
Director Dr. Letitia Dzirasa	Baltimore City Health Department
Bill Wells	Mayor's Office of Homeless Services
Joe Savage	U.S. Interagency Council on Homelessness

Leadership Committee on Homelessness and Housing (Successor to Core Leadership Team)

Name	Organization	Sector
Irene Agustin	MOHS	Public Agency - Homeless Services
Alice Kennedy	DHCD	Public Agency - Housing & Community Development
Faith Leach	Mayor's Office	Public Agency
Dr. Letitia Dzirasa	Health Department	Public Agency - Health
Janet Abrahams	HABC	Public Housing Authority
Joe Savage	USICH	Federal Partner
Dr. Debra Brooks	MOCFS	Public Agency - Children & Family Services
Crista Taylor	Behavioral Health Services	Public Agency - Behavioral Health
Shantay Jackson	MONSE	Public Agency - Public Safety
Jonathan Eckman	VA	Public Agency - Veterans
Anthony Williams	LEAC	Lived Experience
Lolah James	YAB	Lived Experience
Candice Treen		Lived Experience
Mark Council		Lived Experience
Janice Miller	House of Ruth Maryland, CoC Chair	Domestic Violence
Amy Kleine	Weinberg Foundation	Philanthropy
Dana Henson	Henson Development	Housing Development
Kevin Lindamood	HCH	Homeless Service Provider
Maria Evora	Downtown Partnership	Business



BALTIMORE CITY
DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT

Name	Organization	Sector
Dr. Wendy Shaia	UMSSW/SWACOS	Academia
Iya Dammons	Safe Haven	Homeless Service Provider

Individual Interviews

Name	Organization	Date
Anthony Williams	Continuum of Care	7/29/2021
Winston Phillips	Continuum of Care	7/30/2021
Kevin Lindamood	Healthcare for the Homeless	7/30/2021
Alice Kennedy	DHCD	7/30/2021
Matt Hill	Public Justice Center	8/02/2021
Dan McCarthy	Episcopal Housing Corporation	8/05/2021
Carolyn Johnson	Homeless Person Representation Project	8/06/2021
Matrin Bartness and Jo Anne Wallace	Baltimore Police Department	8/06/2021
John Schiavone	St. Vincent De Paul	8/09/2021
Dr. Letitia Dzirasa	Health Department	8/09/2021
Janet Abrahams	Housing Authority	8/09/2021
Mary Slicher	Project Please	8/10/2021
Janice Miller	Continuum of Care	8/13/2021
Tom Akras and Nick Usher	Downtown Partnership	8/20/2021
Tisha Edwards	MOCFS	8/23/2021
Lydia Watts	ROAR – Rebuild, Overcome, and Rise	1/27/2023
Dan Pontious	Baltimore Metropolitan Council	1/30/2023
David Prater	Disability Rights Maryland	2/07/2023
John Clow	Baltimore VA Hospital	2/08/2023

Listening Sessions Attendees

Name	Organization
Jeff Garrett	CoC Board
Sonce Reese	CoC Board
Elizabeth Van Oeveren	Behavioral Health System Baltimore (BHSB)
Dale Meyer	People Encouraging People
Janice Miller	House of Ruth Maryland
Carolyn Johnson	Homeless Persons Representation Project
Ingrid Lofgren	HPRP
Mary C. Slicher	Project PLASE
Tracy Pindell	Sarah's Hope Family Shelter - SVDP
Irisha Lucas	THE NEST
Ann Hedgebeth	GEDCO
Joyce Siler	GEDCO



Name	Organization
Mary Rode	St Vincent de Paul
Penny Gibson	St. Vincent de Paul
Charles Smith	At Jacob's Well
Leroy Fowlkes	Greenspring Men's Shelter
Beth Benner	Women's Housing Coalition
JoAnne Wallace	Baltimore city police department
Jaime Cramer	Bureau of Budget and Management Research
Michelle Smith	Office of Emergency Mgmt
Geon Floyd	MOHS
John Friedel	The Baltimore Station
Jenny Hope	HEBCAC
Terry Staudenmaier	Abell Foundation
Amy Kleine	Harry & Jeanette Weinberg Foundation

Pipeline Dialogue Invitees

Name	Organization
Amy Collier	Associated Catholic Charities
Kevin Lindamood	Health Care for the Homeless
Dale Meyer	People Encouraging People
Anthony Butler	AIDS Interfaith Residential Services (AIRS)
Charles Smith	At Jacob's Well
Nico Sanders	Community Housing Associates
Odette Belcher	Dayspring Programs
Elizabeth Van Oeveren	Behavioral Health System Baltimore
Nichole Battle	GEDCO
John Shiavone	St Vincent de Paul
Mary Rode	St Vincent de Paul
Toni Boulware	St Vincent de Paul
Katie Allston	Marian House
Leah Mason-Grant	St. Ambrose Housing Aid Center
Mary C. Silcher	Project Place
Beth Benner	Women's Housing Coalition
George Klebb	Unity Properties (Bon Secours)
Lisa Stachura	Unity Properties (Bon Secours)
Mary Claire Davis	AHC of Greater Baltimore
Dan Pontious	Baltimore Metropolitan Council
Steve Johnson	Behavioral Health Services Baltimore
Shawn Jones	CoC Leadership
Janice Miller	CoC Leadership
Alice Kennedy	DHCD
Alex Hoffman	DHCD



BALTIMORE CITY
DEPARTMENT OF HOUSING &
COMMUNITY DEVELOPMENT

Name	Organization
Jessica Sorrell	Enterprise Development
Christine Madigan	Enterprise Community Development
Ned Howe	Enterprise Community Development
Dan McCarthy	Episcopal Housing Corporation
Jocelyn Gaynors	Family Recovery Program
Michael Moore	HABC
Michael Burns	Helping Up Mission
Dana Henson	Henson Development
Catherine Stokes	Homes for America
Pam Askew	McCormack Baron Salazar
Elizabeth Everhart	Mission First
Chris Everett	Mission First
Sarah Constant	Mission First
Katie Yorick	MOHS
Bill Wells	MOHS
Irene Agustin	MOHS
Mike Bainum	Rebuild Metro
FT Burden	Springboard Community Services
Owen McCabe	Volunteers of America - Mid Atlantic Development
Amy Kleine	Weinberg Foundation

HOME ARP Public Notice – February 2023

From: City of Baltimore <baltimorecity@alerts.baltimorecity.gov>

Sent: Monday, February 27, 2023 4:24 PM

To: Hoffman, Alexandra (DHCD) <Alex.Hoffman@baltimorecity.gov>

Subject: Public Comment Period OPEN for HOME-ARP Draft Plan

[Comments can be submitted](#) until March 28, 2023, 4:30 pm EST.

The City of Baltimore through its Department of Housing and Community Development (DHCD) wishes to notify citizens, non-profit agencies, businesses and City Departments of their intent to submit an Allocation Plan to the U.S. Department of Housing and Urban Development (HUD) related to the use of the HOME Investment Partnership (HOME) award to the City of Baltimore as part of the American Rescue Plan (ARP) Program.

[LEARN MORE AND REVIEW DRAFT PLAN HERE](#)

Hawley, Tammy D. (DHCD)

- Jillian Fox;
- Moriarty, Susan (DHCD)

Cc:

- Shiri Yadlin (she/her) <shiri.yadlin@csh.org>;
- Mary Rode <mary.rode38@outlook.com>

+1 other

Mon 2/13/2023 3:13 PM

The notice was sent to 21,248 subscribers on DHCD's contact list, which includes developers, homeownership program participants, adopt-a-lot license holders, legislators, open bid notice followers, and previous DHCD workshop participants.

Tammy D. Hawley

Chief of Strategic Communications

417 E. Fayette Street, 14th Floor

Baltimore, Maryland 21202

Office: **(443) 984-5753** | Mobile: **(443) 845-1222**

dhcd.baltimorecity.gov

[View this email in your browser](#)



HOME-ARPA Award Public Hearing

Dear CoC Board Members,

The City of Baltimore, through its Department of Housing & Community Development (DHCD), wishes to notify citizens, non-profit agencies, businesses and City Departments of their intent to submit an Allocation Plan to the U.S. Department of Housing and Urban Development (HUD) related to the use of the HOME Investment Partnership (HOME) award to the City of Baltimore as part of the American Rescue Plan Act (ARPA).

DHCD will conduct a hybrid in-person / on-line **public hearing** on **Thursday, February 23, 2023**, at **6:00 p.m.** The purpose of this hearing is to afford citizens an opportunity to discuss community needs with regard to the HOME-ARPA award. This is a great opportunity for Baltimore City's Continuum of Care to participate and provide comment to the Allocation Plan.

Subject to the acceptance of the Allocation Plan, the following amount will be awarded by the HUD and available to the City: HOME-ARPA \$15,456,082.

Please [visit here for links](#) to register to attend in person or online.

Kind regards,

Paroma



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[Home](#) » [Public Comment Form - HOME-ARP Allocation Plan](#) » [Results](#) » Table

Public Comment Form - HOME-ARP Allocation Plan

<div><div>View published</div><div>New draft</div><div>Moderate</div><div>Webform</div><div>Results</div><div>Revisions</div><div>Clone</div></div>																
<div><div>Submissions</div><div>Analysis</div><div>Table</div><div>Download</div><div>Clear</div></div>																
Showing 1 - 8 of 8.																
#	Submitted	User	IP address	Name:	Organization:	Address:	Email:		Do your comments reflect:	What agency:	What is your initial reaction to the proposed Notice of Funds Availability (NOFA)?	If you represent an organization, which of the following types (check all that apply):	If you represent an organization, which of the following populations do you serve (check all that apply):	Please enter your comments, questions or concerns related to the HOME-ARP draft plan here.	You may upload a file with additional comments here if needed.	
8	03/20/2023 - 6:38pm	Anonymous (not verified)	104.156.87.143	Kimberly King	Out Think The Box	PO Box 23269 Baltimore, MD 21203	kimgerly@outthinkthebox.net	Yourselves			Don't Support	Transformative and innovative change agent for scaling up urban agriculture and homefulness for urban farm stewards	People experiencing homelessness People at risk of homelessness People with low incomes at risk of housing instability		Farmers, including urban farmers are historically housing challenged and housing insecure. It's ironic your department supports the Adopt A Lot Program to encourage urban farming, yet has not thoroughly explored the necessity to provide pragmatic, attainable, sustainable housing for this demographic. It is clear zoning and policy needs to be updated to support this need that can also improve fresh food security and fresh food access to the adjacent community. Can rent to own row houses or ADUs (Accessory Dwelling Units)/tiny dwelling on wheels adjacent row house properties be considered, where urban farmers can reside in these dwellings? https://www.outthinkthebox.net/projects/homesteady.html https://outthinkthebox.net/DROPBOX/13Dec2022_AGRIHOOD_BALTIMORE_v1.pdf Thanks for the consideration.	
7	03/15/2023 - 8:46pm	Anonymous (not verified)	167.82.233.84	Tanya Baker	Baker's Investment	505 Bowleys Quarters Road, Apt d	bakertanya1@yahoo.com	Yourselves			Support	Organization that addresses fair housing, civil rights, and the needs of people with disabilities	People with low incomes at risk of housing instability Organization that addresses fair housing, civil rights, and the needs of people with disabilities		How do this program alignment to the local ordinance and the sustainability of the local communities and environment. Have the zoning been established for the individual projects ? What are the guideline for solicitation of local WMBE or local developers? How will there implementation plans affect the surrounding communities or the redline district? What are the HUDs guidelines to ensure the procurement and bidding process for these anticipated projects? Will local government or HUD establish the specific types of the dwelling that should be developed according to NOFA. How will the structure type affected the CHIP neighborhoods and within a particular communities or will these projects be establish based on local zoning ordinance.	
6	03/15/2023 - 8:46pm	Anonymous (not verified)	104.156.87.148	Tanya Baker	Baker's Investment	505 Bowleys Quarters Road, Apt d	bakertanya1@yahoo.com	Yourselves			Support	Organization that addresses fair housing, civil rights, and the needs of people with disabilities	People with low incomes at risk of housing instability Organization that addresses fair housing, civil rights, and the needs of people with disabilities		How do this program alignment to the local ordinance and the sustainability of the local communities and environment. Have the zoning been established for the individual projects ? What are the guideline for solicitation of local WMBE or local developers? How will there implementation plans affect the surrounding communities or the redline district? What are the HUDs guidelines to ensure the procurement and bidding process for these anticipated projects? Will local government or HUD establish the specific types of the dwelling that should be developed according to NOFA. How will the structure type affected the CHIP neighborhoods and within a particular communities or will these projects be establish based on local zoning ordinance.	

#	Submitted	User	IP address	Name:	Organization:	Address:	Email:	Do your comments reflect:	What agency:	What is your initial reaction to the proposed Notice of Funds Availability (NOFA)?	If you represent an organization, which of the following types (check all that apply):	If you represent an organization, which of the following populations do you serve (check all that apply):	Please enter your comments, questions or concerns related to the HOME-ARP draft plan here.	You may upload a file with additional comments here if needed.
5	03/14/2023 - 7:38pm	Anonymous (not verified)	104.156.87.159	Garry Aime	Komite Ayiti, Inc	5408 Parkside Place Baltimore, MD21206	garry@komiteayiti.org	An organization		Support	After school youth tutoring program	People fleeing or attempting ot flee domestic violence Education	I would like the program to allow organizations to assist the youth on homeless and education outreach and tutoring	
4	03/09/2023 - 9:49am	Anonymous (not verified)	167.82.233.102	George Kleb	Bon Secours Community Works	26 N. Fulton Avenue, Baltimore, MD, 21223	george_kleb@bshsi.org	An organization		Support	Organization that addresses fair housing, civil rights, and the needs of people with disabilities	People experiencing homelssness People at risk of homelessness People with low incomes at risk of housing instability Organization that addresses fair housing, civil rights, and the needs of people with disabilities	Flexibility in use of funds to provide services to formerly homeless individuals would greatly enhance the quality of housing available to the population.	
3	03/01/2023 - 11:33am	Anonymous (not verified)	104.156.87.149	Christina Flowers	Homeless Housing FIrst Advocate	2526 N Charles St Baltimore Md 21218	cflow32@gmail.com	An organization		Support but with reservation	An organization that has Housed over thousands of Unsheltered street homeless individuals from an independent grassroots level	People experiencing homelssness People at risk of homelessness People with low incomes at risk of housing instability	My history and experience with Baltimore City funding process has been challenging and complicated to have a fair opportunity to even be considered for funding even while you are in the midst of the work. Organizations with track records of addressing and engaging our least fortunate and our underserved population should be considered as a part of the solution. We can not continue to operate in such a way with funding if we truly desire to End Homelessness.	
2	03/01/2023 - 11:32am	Anonymous (not verified)	167.82.233.29	Christina Flowers	Homeless Housing FIrst Advocate	2526 N Charles St Baltimore Md 21218	cflow32@gmail.com	An organization		Support but with reservation	An organization that has Housed over thousands of Unsheltered street homeless individuals from an independent grassroots level	People experiencing homelssness People at risk of homelessness People with low incomes at risk of housing instability	My history and experience with Baltimore City funding process has been challenging and complicated to have a fair opportunity to even be considered for funding even while you are in the midst of the work. Organizations with track records of addressing and engaging our least fortunate and our underserved population should be considered as a part of the solution. We can not continue to operate in such a way with funding if we truly desire to End Homelessness.	
1	02/27/2023 - 4:48pm	Anonymous (not verified)	104.156.87.179	Daniel McCarthy	Episcopal Housing Corporati	3986 Roland Avenue Baltimore, MD 21211	dan@episcopalhousing.org	An organization		Support	Continuum of Care Homeless service provider	People experiencing homelssness People at risk of homelessness People with low incomes at risk of housing instability	I am in favor of Baltimore City’s plan for allocating HOME-ARPA funds. Housing solves homelessness. There are too few sources of capital dedicated to the development of housing for those exiting homeless and those who are at risk of homelessness. These capital funds will allow us to produce units that are dedicated to meeting the housing needs of homelessness households for the long term. We look forward to working with Baltimore City to complete projects using HOME ARPA funding.	



HOMELESS PERSONS REPRESENTATION PROJECT, INC.

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Administrative Assistant

Audreina Blanding
Linda Kennedy
*Fellow
In Economic Justice*

March 28, 2023

Alice Kennedy
Housing Commissioner
Baltimore City Department of Housing and Community Development

Dear Commissioner Kennedy,

The Homeless Persons Representation Project (HPRP) appreciates the opportunity to submit the following comments on Baltimore City's HOME-ARP Draft Allocation Plan (Draft Plan). HPRP supports the use of HOME-ARP to create new Permanent Supportive Housing (PSH).

DHCD should ensure that PSH created with HOME-ARP operates under the Housing First model.

Key principles of Housing First are immediate access to housing with no housing readiness requirements; participant choice and self-determination; recovery orientation; individualized and participant-driven supports; and social and community integration. While the Draft Plan briefly mentions that PSH units must be accessible to people with high barriers, provide tenant centered support service, and use evidence-practices, there is no specific mention of Housing First. The Draft Plan ought to make clear that PSH units developed with HOME-ARP must follow Housing First. Any NOFO, financing, or other binding legal documents should clearly define the Housing First model and provide detailed requirements for operationalizing the model. This should include the elimination of tenant selection and screening for criminal records, poor rental history, prior evictions, debts including rental debt, bad credit or no credit, and income ratio requirements. There should also be clear prohibitions on requiring supportive services participation as a condition of tenancy, and inclusion of other policies and practices to prevent lease violations and evictions. HOME-ARP PSH units should also be required to comply with any Standards of Care for PSH adopted by the Baltimore City Continuum of Care (CoC).

The Draft Plan contains little information on how the supportive services for PSH units will be funded, noting only that funding sources are being explored including expansion of the current Medicaid Waiver program, Assistance in Community Integration Services (ACIS). The provision of robust supportive services by qualified and experienced providers is critical to any successful PSH program. Supportive services cannot be an afterthought. There should be specific and enforceable requirements related to supportive services for any PSH development using HOME-ARP, including a services budget with a minimum cost per unit per year on services, the types of supportive services offered, and the training and qualifications of staff.

Having clear requirements for Housing First operation is particularly important given that the Draft Plan suggests that PSH units will also be funded with project-based vouchers from the Housing Authority of Baltimore City (HABC). The federal Housing Choice Voucher Program does not have a Housing First orientation, and Baltimore has and continues to have both HABC tenant-based and project-based vouchers in PSH with mixed results. For example, HABC continues to screen for criminal records beyond the HUD-mandated prohibitions, screen for debts owed to the Public Housing Authority (PHA), prior evictions from assisted housing, and other tenant selection criteria, and has minimum rent requirements. There has also been a lack of clarity around who the supportive services provider is for some of these HABC-funded PSH units and who is responsible for monitoring the service provider. HABC is a Moving to Work (MTW) jurisdiction, and, as such, has significant flexibility which it ought to be exercising to ensure that HABC-funded PSH units can truly operate as Housing First. If HABC does not believe it has the authority to implement Housing First principals with project-based vouchers it ought to be requesting waivers from HUD.

Permanent Supportive Housing should be integrated and further Fair Housing

Integration is a critical component to successful PSH programs and includes models that are scattered site housing or set-aside units in housing in which units are also available to people who do not have disabilities or histories of homelessness. Not only are integrated PSH models a best practice, but they are required by law. *Olmstead v. L.C.* requires that housing for persons with disabilities be provided in the most integrated setting possible and such settings should enable persons with disabilities to interact with non-disabled persons to the fullest extent possible. 527 U.S. 581 (1999). HPRP recommends that PSH units in a multi-family development be limited to no more than 20% of units in the development. PSH units should also include units that meet the Uniform Federal Accessibility Standards (UFAS), and provide other accessibility features as needed.

As a recipient of HUD funds DHCD has a legal obligation to affirmatively further fair housing (AFFH) under the Fair Housing Act. This obligation requires DHCD to take meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities. Given Baltimore's long-standing and persistent racial segregation in housing it is important to consider the location of new affordable housing that will include PSH. These developments should be prioritized in areas of opportunity with strong schools, low poverty, and access to transportation and employment, or be part of a concrete plan to transform an existing under-resourced racially concentrated area into an opportunity area.

Baltimore City does not have a surplus of emergency shelter

The Draft Plan "suggests that there is a surplus of emergency shelter availability." This conclusion was drawn based on an incomplete analysis that looked only at the Housing Inventory Count and Point in Time Count required by HUD. Access to Baltimore City-funded emergency shelter is handled through a Shelter Hotline. All shelter placements must go through the hotline and there is no waiting list

maintained for shelter beds. It is unclear why data from the Shelter Hotline was not considered in the analysis, but HPRP routinely hears from people who have tried to access shelter and been told no shelter is available. This is especially true for families with children and homeless youth. In fact, Baltimore City does not have a single shelter bed for unaccompanied homeless youth under the age of 18 despite changes to State law in 2020 that permit such shelters. While it may be the case that community feedback prioritized the creation of PSH, it is still important to accurately report the unmet need for emergency shelter/interim housing in our system.

Implementation of the Strategic Investment Plan, including HOME-ARP funding, should be overseen by the Baltimore City Continuum of Care.

The Continuum of Care (CoC) and CoC Board is a group of relevant organizations including nonprofit homeless assistance providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, and organizations that serve veterans and homeless and formerly homeless individuals mandated by HUD to coordinate the implementation of a housing and service system to meet the needs of people experiencing homelessness. 24 C.F.R. 578.5 & .7. Specific requirements for the operation of the CoC and CoC Board as well as specific duties are set forth in federal regulations. In addition, the Baltimore City CoC has a Charter and Bylaws that govern its operations including election of CoC Board members by the community.

Despite this existing HUD-mandated structure of community oversight, Baltimore City recently created a Baltimore Housing and Homelessness Leadership Committee chaired by the Director of MOHS and the Housing Commission of DHCD. Members of the Leadership Committee were hand-selected by the Mayor and/or the Chairs. The Leadership Committee has also created subgroups to work on various projects related to housing and services for individuals experiencing homelessness. To our knowledge the Leadership Committee has no written Charter or Bylaws governing membership composition, conflicts of interest, or decision-making authority, and information on meetings dates and agendas has been difficult to obtain. While promises were made that the Leadership Committee will work in collaboration with the CoC, the reality has been very different. Information is being presented to the CoC after decisions have already been made by the Leadership Committee and/or subgroups, and it has been difficult to understand how CoC members and the public, including people with lived experience of homelessness, can participate in this system.

The Leadership Committee is clearly a public body under Maryland's Open Meetings Act as its members were appointed by the Mayor or someone subject to the Mayor's policy direction (MOHS Director and DHCD Housing Commissioner), and it has at least two members who are not employed by Baltimore City. As such, the Leadership Committee must give reasonable advance notice of its meetings, make agendas available in advance, hold its meetings openly, adopt minutes and

retain them for 5 years. To date, HPRP does not believe these requirements are being met.

A web page dedicated to the Leadership Committee does not contain this basic information. See, <https://homeless.baltimorecity.gov/tackling-housing-insecurity-%E2%80%93-baltimore%E2%80%99s-homelessness-and-housing-initiative>.

Even if the Leadership Committee would come into compliance with the Open Meetings Act, HPRP still recommends that it be phased out and the work transferred to the Baltimore City CoC.

Thank you for the consideration of HPRP's comments and we hope that there will be ongoing opportunities for public collaboration and input as this process moves forward. If you have any questions, I can be reached at cjohnson@hprplaw.org or 410-656-4886.

Sincerely,

Carolyn Johnson
Managing Attorney
Homeless Persons Representation Project.

Cc: Irene Augustine, Director MOHS
Janice Miller, Chair CoC Board
Anthony Williams, Vice Chair CoC Board
Charles Halm, Director CPD, Baltimore HUD Field office