

## HOME-ARP Allocation Plan Template with Guidance

**Instructions:** All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

### Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

### Template:

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

The City of Danville sent both an information letter about how HOME-ARP funding must be spent and the City of Danville’s plan for spending HOME-ARP funding. The City of Danville also contacted various organizations via email on their opinions of how each qualified population can be assisted and which qualified population had the greater need in the City of Danville.

*List the organizations consulted:*

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Felecia Watkins/ STEP Inc.</b>	Continuum of Care	Email letter and Survey	“dollars allocated to hire caseworkers, will be well worth it. Nationally, communities that use the housing model, financial support, and client-centered case management as their goal can help individuals and families remain in housing more successfully. With DHCD funding, the CoC-funded members can assist those affected by homelessness with rapid rehousing and targeted prevention funds. Those funds allow supporting those on case management financially for a more extended period until they become more economically stable.”
<b>Jackie Rochford/ House of Hope</b>	Homeless Shelter	Email letter and Survey	none
<b>Jude Swanson/ House of Hope</b>	Homeless Shelter	Email letter and Survey	none
<b>Tommy Bennett/ Danville VA NAACP Chapter</b>	Civil Rights Agency	Email letter and Survey	none
<b>Larissa Deedrich/ Danville Redevelopment &amp; Housing Authority</b>	Housing Authority	Email letter and Survey	“It is terrific news that the City has taken an interest in providing resources for our homeless residents. While I think that there is a great need for an expansion of the homeless shelter, and it will help immensely, I would like to offer the services of DRHA. As many of you know, we are already operating the Section 8 voucher program, and currently, we are issuing vouchers, and our clients are struggling to find homes that will accept the voucher. With the rental market in Danville booming, most landlords are not inclined to rent to Section 8 tenants. DRHA is currently working on purchasing homes, rehabbing homes, and even new construction to meet the long-term housing needs of our residents. I believe that this is an opportunity for us to all collaborate and work together to provide not only short-term supportive services to the homeless population but also serve their long-term needs as well.”
<b>Kimberly Walker/ Danville Redevelopment &amp; Housing Authority, Center for Housing Education</b>	HUD counselor and educator	Email letter and Survey	none
<b>Nicole Crews/ Department of Veterans’ Affairs</b>	Veteran’s Agency	Email letter and Survey	none
<b>John Drawbond/ Department of Veterans’ Affairs</b>	Veteran’s Agency	Email letter and Survey	none

Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
<b>Margie Walker/ Virginia Legal Aid Society</b>	Fair Housing Agency/ Agency Assisting persons with disabilities	Email letter and Survey	none
<b>Tammy Warren/ Haven of the Dan River Region</b>	Domestic Violence Shelter	Email letter and Survey	none
<b>Ashley Corbett/ Haven of the Dan River Region</b>	Domestic Violence Shelter	Email letter and Survey	none
<b>Jim Bebeau/ Danville-Pittsylvania Community Services</b>	Agency representing persons with disabilities	Email letter and Survey	“As a provider of 24/7 Crisis Services (for mental health, substance abuse and developmental disabilities), there are often situations where someone showed up for crisis services (at DPCS locations or in the SOVAH ER), but the only crisis was housing. The homeless shelter wouldn’t take them and no financial resources for a hotel created a real dilemma for the individual. Perhaps allowing limited use funds in these situations (with a requirement to participate in the housing counseling or obtain supportive housing services) would make a difference. The inevitable downside - People will learn of the opportunities and show up expecting to get a hotel for the night without any real change in their lifestyle to prevent a recurring concern”

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

All that provided feedback acknowledged a need for housing especially those that may currently be homeless or facing homelessness. Education and supportive services were topics along with creating more affordable housing.

**Public Participation**

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

**Template:**

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

- ***Date(s) of public notice: 6/26/2022***
- ***Public comment period: start date - 6/27/2022 end date - 7/11/2022***
- ***Date(s) of public hearing: 6/28/2022***

***Describe the public participation process:***

The public comment period started 06/27/2022 and end 07/11/2022. During this time, the public was able to call, email, write to and speak to members of the Housing and Development Department about the intended plans for HOME-ARP funds. A public hearing was held on 06/28/2022 at 427 Patton St Room 202, Danville, VA 24541 from 11am until 1pm.

***Describe efforts to broaden public participation:***

The HOME-ARP allocation plan is published on the City of Danville’s Housing and Development webpage, a copy of the allocation plan will be made available in the public library, Averett University library, Danville Police Department PEACE Center, Danville Police Department- Third Ave precinct.

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

None received

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

N/A

## **Needs Assessment and Gaps Analysis**

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps

Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

**Template:**

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

***Homeless as defined in 24 CFR 91.5***

The exact size of the current homeless population is currently unavailable. This data is unavailable from the census. According to the most recent count by the Piedmont Better Housing Coalition, there is an average of 25 homeless individuals in Danville and Pittsylvania County.

***At Risk of Homelessness as defined in 24 CFR 91.5***

Based on a 2013 point-in-time survey conducted on 174 adults and 107 accompanied children in the West Piedmont region, 49% of the homeless or at risk of homelessness population was facing eviction.

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

The exact size of the current fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking population is currently unavailable. This data is unavailable from the census and is not currently tracked by the local continuum of care.

***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 exact size of other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability is currently unavailable. This data is unavailable from the census and is not currently tracked by the local continuum of care.

***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):***

- House of Hope – Non-Congregate shelter
- Haven of the Dan River Region – Domestic violence, sexual assault and sex trafficking non-congregate shelter

- Piney Ridge Apartments- Supportive Services permanent rental housing
- Upper Street Apartments- Veteran Housing
- Temporary Shelter, Danville Department of Social Services- provides up to a week hotel stay for families (at least one adult and one child) currently facing homelessness that have a plan of action in place to prevent homelessness after the week stay is complete.

***Describe the unmet housing and service needs of qualifying populations:***

***Homeless as defined in 24 CFR 91.5***

The current homeless shelter is only able to house 16 single individuals, no families or adults with children. Although the temporary shelter program is available through the Department of Social Services, it only provides emergency shelter for up to a week.

***At Risk of Homelessness as defined in 24 CFR 91.5***

There is no constantly funded tenant based rental assistance. The City of Danville used CDBG-CV funds for tenant based rental assistance to assist 1,207 individuals for a total of \$746,934.12 but has since expended all funds. Virginia Legal Aid Society provided tenant based rental assistance using funds provided through the Virginia Department of Housing and Community Development, but assistance ended in May of 2022.

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

Haven of the Dan River Region is the local shelter for current fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking individuals or families. Males are housed at a separate location from females, but the shelter is only able to house 8 individuals.

***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***

According to the City of Danville’s Eviction Data Analysis prepared under the Virginia Eviction Reduction Planning Grant, there are no other populations requiring services or housing assistance to prevent homelessness or other populations at greatest risk of housing instability.

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

The current homeless shelter, House of Hope is only able to house 16 single individuals, no families or adults with children. The Danville Redevelopment and Housing Authority is facing a housing shortage for recipients of their housing choice vouchers. Currently, they are purchasing properties and homes and building homes or rehabbing current homes on the property.

***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:***

Not applicable

***Identify priority needs for qualifying populations:***

All qualifying populations currently do not have enough emergency shelter and those at risk of homelessness do not have options for assistance to avoid homelessness. Therefore, the City of Danville decided that it was best to expand the current non-congregate homeless shelter and provide tenant based rental assistance.

***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 Danville was able to use data provided by an Eviction Data Analysis for the City conducted under the Virginia Eviction Reduction Planning Grant, the US Census, West Piedmont Planning District Commission and the Piedmont Better Housing Coalition. The City also conducted a survey and provided an information letter to various entities in the community to receive their input as well as their suggestions and comments on needs for qualifying populations.

## **HOME-ARP Activities**

**Template:**

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

The City Manager, Deputy City Manager, Director of Community Development along with various community leaders met to discuss HOME-ARP funds and potential uses. The City of Danville’s Department of Community Development was made aware of the shortage of available beds/units for the current homeless population. Also, there is no housing available for homeless families (with children) or women unless they are fleeing domestic violence/assault or sex crimes/trafficking. It was decided that most of the funds would be used to expand the current homeless shelter, other funds would be used for tenant-based rental assistance to prevent homelessness and target those at risk of homelessness. Lastly, we will use funds for non-profit operating expenses for the salary of an employee of the homeless shelter.

***Describe whether the PJ will administer eligible activities directly:***

The City of Danville will allocate funds to the House of Hope who will oversee the expansion of the homeless shelter. The House of Hope will provide invoices for both the development of the

non-congregate shelter as well as non-profit operating expenses for the salary of an employee. The City of Danville will administer the tenant-based rental assistance program.

***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:***

Not applicable

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

**Template:**

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ #		
Acquisition and Development of Non-Congregate Shelters	\$ 600,000.00		
Tenant Based Rental Assistance (TBRA)	\$ 340,000.00		
Development of Affordable Rental Housing	\$ #		
Non-Profit Operating	\$ 43,226.54	4.36 %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 7,440.46	.75 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 990,667.0</b>		

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

The City of Danville believes by expanding the current homeless shelter that it will be able to assist all qualified populations. The expansion will allow for a space for currently fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking individuals or families, veterans, those currently facing homelessness and those at risk of homelessness. Tenant based rental assistance will assist those at risk of becoming homeless.

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

The City of Danville believes by expanding the current homeless shelter that it will be able to assist all qualified populations. The expansion will allow for a space for currently fleeing, or



attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking individuals or families, veterans, those currently facing homelessness and those at risk of homelessness. Tenant based rental assistance will assist those at risk of becoming homeless.

## **HOME-ARP Production Housing Goals**

### **Template**

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

The City of Danville will not produce any affordable rental units for qualifying populations. Tenant based rental assistance will allow for populations at risk of homelessness to remain in affordable housing units.

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

Not applicable

## **Preferences**

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards

that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ’s HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

### **Template:**

***Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:***

The City of Danville will give preference to one or more qualifying population or subpopulation within the qualifying population for Tenant Based Rental Assistance. These preferences will be adults accompanied by children and persons at risk of homelessness.

***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:***

Due to the lack of beds available in the current non congregant homeless shelter, the City of Danville feels as if adults accompanied by children and personas at risk of homelessness would have the greatest benefit of tenant-based rental assistance.

## **Referral Methods**

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

## **Template:**

***Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):***

The City of Danville will use the coordinated entry process for tenant based rental assistance. Assistance will be given to approved applicants in the order in which applications are received and approved. The City will advertise and administer the program directly.

***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):***

All qualifying populations will be eligible for tenant based rental assistance but there will be a preference for populations at risk of homelessness.

***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):***

The City of Danville will combine the following factors when describing the method of prioritization:

- the extent to which people, especially youth and children, are unsheltered
- risk of continued homelessness

***If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):***

Not applicable, the City of Danville will only use a CE process established by the CoC.

### **Limitations in a HOME-ARP rental housing or NCS project**

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap

identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.

- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

### **Template**

***Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:***

The City of Danville will not limit eligibility for the NCS project to a particular qualifying population or specific subpopulation of a qualifying population.

***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:***

Not applicable

***If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):***

Not Applicable

### **HOME-ARP Refinancing Guidelines**

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***  
Not applicable
- ***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.***  
Not applicable
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***  
Not applicable
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***  
Not applicable
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***  
Not applicable
- ***Other requirements in the PJ's guidelines, if applicable:***  
Not applicable