

# HOME-ARP Allocation Plan Template

## Guidance

- To receive its HOME-ARP allocation, a PJ must:
  - Engage in consultation with at least the required organizations;
  - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
  - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
  - Affirmatively Further Fair Housing;
  - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
  - Anti-Lobbying;
  - Authority of Jurisdiction;
  - Section 3; and,
  - HOME-ARP specific certification.

**Participating Jurisdiction:** City of Elizabeth, NJ

**Date:** 1/19/2022

## Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and 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, at a minimum. 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.

### *Summarize the consultation process:*

The City partners with non-profits organizations in the delivery of its CDBG and HOME annual allocations. Several were consulted with during the development of the HOME-ARP Allocation Plan. These consulted entities provide housing and services to the eligible populations of the HOME-ARP program on an on-going basis and have relevant knowledge on the needs, service gaps, and potential activities that would best benefit qualified populations. Entities consulted

include those who work with families or individuals experiencing homelessness, are at-risk of homelessness, and other vulnerable qualifying populations such as veterans.

In the development of the allocation plan, the City consulted with stakeholders and asked for their input concerning the HOME-ARP grant, eligible activities, and the proposed budget. Entities articulated their gap in services and housing needs by providing written and verbal comments. The following table summarizes the feedback received.

The City will continue to meet with entities throughout the implementation of the HOME-ARP activities in an effort to assess the ongoing needs of our community and will continue to work together to develop strategies that will help address chronic homelessness.

*List the organizations consulted, and summarize the feedback received from these entities.*

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Housing Authority of City of Elizabeth</b>	Public Housing Authority	Email correspondence	Increase funding to expand and preserve the supply of affordable housing; expand funding for affordable senior housing programs
<b>Elizabeth/Union County CoC</b>	Continuum of Care	Email correspondence/ Phone	Increase in affordable housing in the area; Increase availability of shelter beds, transitional housing, long-term affordable housing, and housing for seniors and individuals with disabilities.
<b>Gateway Family YMCA</b>	Nonprofit Homeless	Email correspondence	Create and maintain low-income rental housing opportunities; Availability of more Section 8 or other subsidies in the area; Provide incentives for developers like tax-credits, etc.
<b>Veterans Services Union County</b>	Nonprofit Homeless	Email Correspondence	Immediate placements for veterans facing homelessness; housing priority for female veterans facing homelessness; case management opportunities for veterans after housing placement.
<b>Agency Name.</b>	Type of Agency/Org.	Method of Consultation.	Feedback.

<b>YWCA</b>	Nonprofit Domestic Violence	Email	Housing, employment, secure child care, reliable transportation
<b>Elizabeth Coalition to House the Homeless</b>	Nonprofit Homeless	Email and video conferencing	Create housing opportunities for low income households who do not meet the income limit but still struggle to afford basic housing in the area.
<b>Family Promise of Union County</b>	Nonprofit Homeless	Email correspondence	Create and maintain safe and affordable rental housing opportunities; Provide TBRA to low-income households; Preserve decent, safe, and affordable owner-occupied housing

If additional space is needed, insert image of table here:

## Public Participation

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.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

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

***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:***

- ***Public comment period: start date - 12/22/2021 end date – 1/6/2022***
- ***Public hearing: 12/28/2021***

The City posted a public notice on December 20, 2021 announcing the availability of the plan for public comment and the planned public hearing on the use of the funds. As required, the notice provided the amount of HOME-ARP funds expected to be received and the range of activities that the City can undertake.

After receiving feedback from HUD on its initial substantial amendment, the City determined it was in its best interest to revisit its proposed strategies based on the input from community stakeholders.

A public hearing on the revised substantial amendment is scheduled for, May 18, 2022, with a second public comment period to occur from, May 13, 2022 to May 27, 2022. To date, no additional comments have been received.

A copy of the substantial amendment was posted to the City's website at: [elizabethnj.org/396/Public-Notice](http://elizabethnj.org/396/Public-Notice).

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

The City of Elizabeth followed its adopted Citizen Participation process, except that the length of the public comment period was shortened to 15 days as allowed by HUD guidance.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

***Summarize the comments and recommendations received through the public participation process:***

At the time of this writing, the City has not received any public comments outside of the consultation process with the public service agencies and other stakeholders such as the public housing authority.

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

At the time of this writing, the City has not received any comments or recommendations that were not accepted.

## **Needs Assessment and Gaps Analysis**

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. 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. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

**OPTIONAL Homeless Needs Inventory and Gap Analysis Table**

<b>Homeless</b>													
	<b>Current Inventory</b>					<b>Homeless Population</b>				<b>Gap Analysis</b>			
	<b>Family</b>		<b>Adults Only</b>		<b>Vets</b>	<b>Family HH (at least 1 child)</b>	<b>Adult HH (w/o child)</b>	<b>Vets</b>	<b>Victims of DV</b>	<b>Family</b>		<b>Adults Only</b>	
	<b># of Beds</b>	<b># of Units</b>	<b># of Beds</b>	<b># of Units</b>	<b># of Beds</b>					<b># of Beds</b>	<b># of Units</b>	<b># of Beds</b>	<b># of Units</b>
Emergency Shelter	299	248	73	0	3								
Transitional Housing	83	0	48	0	0								
Permanent Supportive Housing	171	120	131	102	12								
Other Permanent Housing						0	48	44	16				
Sheltered Homeless						51	73	3	25				
Unsheltered Homeless						0	14	0	0				
<b>Current Gap</b>										30	10	60	60

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

**OPTIONAL Housing Needs Inventory and Gap Analysis Table**

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	<b># of Units</b>	<b># of Households</b>	<b># of Households</b>
Total Rental Units	30,530		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,170		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,985		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		6,140	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,835	
<b>Current Gaps</b>			7,975

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

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

The City utilized the most recent Comprehensive Affordability Strategy (CHAS) data set provided by HUD based on the 2014-2018 American Community Survey data. The City also used data and feedback received from local stakeholders, including the Point in Time Homeless Count, and CoC Housing Inventory. The information below is summarized by the four qualifying populations eligible for assistance under HOME ARP, including (1) homeless individuals and families, (2) individuals and families at risk of homelessness, (3) individuals and families fleeing domestic violence, dating violence, sexual assault, stalking or human trafficking, and (4) populations outside of the first three groups with the greatest risk of housing instability.

**Homeless Population**

For the purposes of this program, homeless is defined in 24 CFR 91.5 and includes those who lack a fixed, regular, and adequate nighttime residence, including cars, parks, public spaces, homeless shelters, and those at imminent risk of losing their primary nighttime residence.

According to the 2021 Point in Time Count, there were 584 persons experiencing homelessness on a single night in Union County. More than half (61%) of these individuals were in Elizabeth. This total only measures homeless persons who meet HUD's specific definition of homelessness staying in shelters and unsheltered persons who can be located. The actual number of homeless is thought to be much higher. During extremely cold weather events identified as Code Blue, shelters in Union County provided assistance to over 3,000 individuals in 2018.

Of the counted population, approximately 60% are African American, 23% are Hispanic, and 11% are non-Hispanic White. Compared to the population of the county as a whole, African Americans are overly represented in the homeless population. Approximately 19% of the households and 40% of persons are in families with a child. Children under the age of 18 accounted for one of every four homeless persons.

Four of every ten individuals reported having some type of disability. The most commonly reported disability was mental health (120), followed by physical disability (91) and chronic health condition (84). These categories are not mutually exclusive as one individual can report multiple disabilities. Ninety one individuals, or 15% of the homeless population, were identified as chronically homeless. Chronically homeless include persons with a long-term disabling condition who have been continually homeless for more than one year or multiple times within the last three years where the total duration is more than one year. More than half of the chronic homeless had more than one disabling condition. There are 24 homeless veterans identified in the count, as well as 34 victims of domestic violence.

In terms of income, one in four households received no income or benefits such as welfare. Slightly more than 1 out of 10 (12%) reported a wage or other work income. The remainder of households received some level of public benefit, including SSI, TANF, or welfare. Three of every four households (73%) were experiencing homelessness for the first time. The most

common reasons for homelessness reported were leaving a shared residence (30%), loss of income (12%), and eviction (8%).

#### At Risk of Homelessness

For the purposes of this program, at risk of homelessness is defined in 24 CFR 91.5 and includes households that (1) have incomes below 30% of the area median income; (2) lack sufficient resources and support networks to avoid becoming homeless; and (3) meet additional conditions such as living in the home of another.

According to the Census Data in the table above, there are 6,140 rental households earning less than 30% of the area median income that have a severe housing problem. The overwhelming majority of housing problems experienced by these households is a housing cost burden where more than half of their income. Any disruption to income, including a cut back in the number of hours worked, can threaten the household's ability to pay its rent and lead to eviction and possibly homelessness. There are 7,175 renter households earning less than 30% of area median income with any housing problem, including overcrowding and incomplete kitchen and/or plumbing facilities. Of these households, sixty three percent are Hispanic, twenty five percent are African American, and eleven percent are non-Hispanic White.

#### Victims of Domestic Violence, Dating Violence, Sexual Assault, Stalking, Trafficking

For the purposes of this program, this category includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.

According to the Point in Time Count, there were 17 households that reported domestic violence. These households included 34 individuals, about half of whom were under 18. Similar to the overall homeless populations, local advocacy groups believe the actual number of persons suffering from domestic violence to be much higher. According to a local DV service provider, one of every three women and one of every four men are victims of domestic violence.

According to the National Network to End Domestic Violence, difficult economic times with job loss can exacerbate and increase the level of need for domestic violence services. Like most domestic violence agencies across the country, the local DV provider has seen an increased demand for services for domestic violence victims throughout the pandemic. In 2019, the last "normal" year before the pandemic, 4,275 individuals were provided DV services. In 2021, the caseload increased to 6,232 - an increase of over 30 percent.

Twelve of the households were homeless for less than six months while five of the households were homeless for more than one year. DV households were more likely to have an income (40%) than the general homeless population.

#### Other Households with Housing Instability

This category includes individuals and families who do not qualify under the other categories but suffer from a high risk of housing instability. This includes formerly homeless individuals and families, severely cost-burdened households earning less than 30% of the area median income, and households that meet the At-Risk of Homelessness definition but have incomes below 50% of the area median income.

This category is similar to the “at-risk of homelessness” above with the main distinction that it includes incomes up to 50% of the area median income. According to the HUD-provided Census data, there are a total of 2,970 renter households earning between 30 and 50% of the area median income who have a severe housing problem, including paying more than half of their income for housing costs. Of those, more than two of every three households (68%) are Hispanic, 22% are African American, and 8% are non-Hispanic White.

***Describe the unmet housing and service needs of qualifying populations, including but not limited to:***

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness;***  
***and,***
- ***Those at greatest risk of housing instability or in unstable housing situations:***

Overall, the current housing situation in the City is dire for the four categories of qualifying populations. In addition to the on-going housing and employment issues related to COVID, the City’s affordable housing stock was damaged by the remnants of Hurricane Ida in September 2021. Damages to the Oakwood Plaza affordable housing complex was so extensive that all residents were relocated into alternate housing until the units can be refurbished.

The common refrain heard during consultations for this process and other recent community needs assessment is the need for more rental housing that is affordable to households earning less than 50% of the area median income. Meeting this need through the development of additional units would serve each of the four qualifying populations. Below is a summary of the unmet housing and service needs specific to the four qualifying populations.

#### **Sheltered and Unsheltered Homeless Populations**

According to the Point in Time Count, most of those reported as homeless were living in shelters and not unsheltered. In comparing the homeless count to the homeless inventory, there appears to be a sufficient number of family units and not enough adults only units. This is assuming the point in time count is adequately identifying the number of households who could potentially benefit from the shelter. According to the local Continuum, an additional ten family units and sixty units for individuals are needed. In terms of unmet need for services, employment, child care, and reliable transportation were cited multiple times throughout the consultation process with local advocacy groups. Given the cost of housing in the local market, households looking to



leave the shelters and secure affordable housing would need to achieve a stable, living wage job or be supported through some level of rental assistance. Job training, child care, and transportation would support beneficiaries in their efforts to achieve a living wage job.

#### At Risk of Homelessness

The chart above identifies 6,140 rental households at or below 30% of income suffer from a housing problem. For the purposes of this plan, any household with a housing problem is considered an unmet need and therefore part of the gap between affordable housing supply and demand. The service needs of those at risk of homeless are not too different than those considered homeless. Securing a living wage job that reduces housing burden and allowing households to save for emergencies is a common need.

#### Domestic Violence

As noted above, households fleeing from domestic violence are more likely to have work income than the homeless population in general. However, households fleeing from domestic violence often have children under the age of 18 as well, so there is a stronger need for supportive services focused on children, including child care and after school care. Specific needs identified by DV service providers included the following five challenges: 1) a large immigrant and undocumented population including many with significant Limited English Proficiency (LEP); 2) a lack of knowledge among victims, particularly immigrants, of their legal rights; 3) a shortage of mental health counseling professionals and in particular bilingual speakers; 4) a need for additional immigration resources with an expertise in domestic violence; and 5) rapidly evolving technology being used to stalk and abuse victims via electronic devices. One of the DV providers in the City is currently rebuilding a non-congregate shelter and has expressed a need for development funds due to rising costs related to COVID.

#### Other Qualifying Populations

This population is similar to the at-risk of homelessness except that incomes are below 50% of the area median income. The need is significantly lower than those in the lowest income bracket. A total of 1,835 households in this income category have a severe housing problem, compared to the 6,140 in the lower income bracket. The most obvious difference between the two groups is the income level. This speaks to the importance of being able to secure a living wage job and the need to provide supportive services that help households in this regard.

***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:***

The following grants and resources are geared towards assisting qualifying populations:

- Social Services for the Homeless (SSH),
- Community Service Block Grant (CSBG),
- Emergency Solutions Grant (ESG),
- SuperNOFA (Notice of Funding Availability),

- HOME Investment Partnerships Grant (HOME),
- Community Development Block Grant (CDBG),
- Supplemental Security Income (SSI)/Social Security Disability Insurance (SSDI),
- General Assistance (GA)/ Emergency Assistance (EA),
- Temporary Rental Assistance (TRA), and
- Temporary Aid for Needy Families (TANF).

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

**Homeless Population**

The City estimates that an additional 10 family shelter units and 60 adults only units are needed to meet the gap in the current shelter inventory. These numbers are based on the data collected from the Continuum of Care and consultations with local stakeholders. Service needs include mental health treatment, substance abuse treatment, and employment-related services including job training, child care, and transportation. The following activities are recommended to address gaps in the current service delivery system. In the short-term, the CoC recommends:

1. Create a working group to focus on homelessness and implement a system of services for homeless individuals and families;
2. Establish a single point of intake and service routes for homeless services;
3. Create Housing First strategies and homeless prevention in addition to crisis-based services;
4. Consider implementing best practices from within other areas of New Jersey (Mercer County) and nationally (Denver, Colorado);
5. Utilize a unified, consistent approach to shelter development among faith-based providers;
6. Review the use of the Homeless Trust Fund in the context of emerging strategies.

In the long term, the following strategies are recommended:

1. Engage in government agencies and stakeholders at all levels, including federal, state, and municipal officials, as well as private sector actors such as developers and landlord confront and resolve the many challenging issues identified in the Community Needs Assessment (CNA) related to affordable housing and income disparities.

It has been noted that increasing access to existing resources for eligible populations to ensure that they receive benefits will help address the overall need of stability for qualifying populations. Steps to increasing access include the following actions:

1. Educating the community on the availability of SNAP, Work First NJ, Medicaid, and Family Care (including Children’s Health Insurance Program/CHIP), EITC, Child Care Tax Credits, etc.

2. Enhance the likelihood that customers will access services by providing them in a customer-friendly manner at DSS; this requires improving the customer service skills of DSS employees.
3. Increase the accessibility of online applications for these services at locations across the county, especially in Family Success Centers and libraries.
4. Establish “Financial Empowerment Centers” in the county to support residents accessing these and other financial support services, such as VITA, EITC, first time homeowner programs, financial planning and other related services.
5. Explore and launch entrepreneurship and small business development initiatives, such as a small business incubator, and the development of entrepreneurship curriculum, possibly with the community college.
6. Continue to focus on resident access and utilization of services and supports available to help them to address their desires to attain better paying jobs, funding available for education/training, etc.

#### At-Risk of Homelessness

As described above, there is a need for an additional 6,140 rental units affordable to households earning less than 30% of the are median income. The most needed services are those related to employment, including job training, child care, and transportation.

#### Victims of Domestic Violence

As described above, there is a current need for development costs to replace a non-congregate shelter lost to fire damages. Service needs include case management focused on the needs of immigrants and undocumented populations and additional mental health counseling.

#### Other Qualifying Populations

As described above, a total of 1,835 households in this income category have a severe housing problem, compared to the 6,140 in the lower income bracket. Supportive services needed are similar to other qualifying populations in that the most effective services would be those that increase income and employment opportunities.

***Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:***

The City does not plan to formally adopt a definition of “other populations”.

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

##### Homeless Populations

For homeless populations, priority needs include an increase in affordable housing units to help households transition from shelters to stable rental housing and support services to help ease that transition. Rapid re-housing and tenant based rental assistance would help households secure existing rental housing currently in the private market. The development of additional housing options, including permanent supportive housing, is also needed to provide long term housing

solutions for chronically homeless populations that will need on-going supportive services to remain in stable housing.

#### At-risk of Homelessness

For extremely-low income households, priority needs include the creation of additional rental units affordable to families with less than 30% of area median income. Priorities for supportive services are focused on those that help households secure living wage jobs, including job training, child care, and transportation services.

#### Victims of Domestic Violence

Providing housing options and supportive services is considered to be a priority for the purposes of this plan. This priority includes ensuring there is adequate shelter space to accommodate persons fleeing from domestic violence as well as financial and service assistance to transfer from a shelter to stable and affordable rental housing.

#### Other Qualifying Populations

While the need is still high for other qualifying populations, the level of need is higher for those households earning less than 30 percent of the area median income. The City will still consider projects and programs that serve other qualifying populations, but the priority should be placed on serving lower income households.

#### ***Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:***

The City relied on HUD-provided census data sets, such as the Comprehensive Housing Affordability Strategy (CHAS). Other data included a county level Community Needs Assessment (CNA) survey in 2020 provided by the Continuum of Care as well as Point in Time Count and Housing Inventory information. The CNA gathered from surveys and focus groups help drive the data and indicate the current needs of the area. The City supplemented this information with the required consultations, including the Housing Authority of the City of Elizabeth and other local stakeholders.

### **HOME-ARP Activities**

#### ***Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:***

The City will accept applications from developers and service providers on a rolling basis to best suit the timing and needs of their development timelines. If the City does not receive sufficient requests for funding, it will publicize the availability of funding and reach out directly to local service providers to gauge interest in administering programs that will best serve the priority

needs of qualifying populations. The City may choose to administer a portion of programs directly if it cannot find a suitable partner. Alternatively, the City may provide capacity building funds, as allowable under the program rules, to assist a local service provider in becoming more capable to efficiently and effectively deliver needed projects and programs.

***If any portion of the PJ’s HOME-ARP administrative funds were 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. The City did not use HOME-ARP administrative funds to procure a subrecipient or contractor to prepare the HOME-ARP allocation plan. The City did receive limited assistance from a grants management consultant procured before the announcement of HOME-ARP funds. This consultant, Usona Development LLC, will be paid from CDBG General Administration and Planning funds/general funds.

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. The following table may be used to meet this requirement.

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 208,343.00		
Acquisition and Development of Non-Congregate Shelters	\$ 1,000,000.00		
Tenant Based Rental Assistance (TBRA)	\$ 0.00		
Development of Affordable Rental Housing	\$ 1,650,000.00		
Non-Profit Operating	\$ 50,000.00	1.5 %	5%
Non-Profit Capacity Building	\$ 50,000.00	1.5 %	5%
Administration and Planning	\$ 400,000.00	12 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 3,358,343.00</b>		

***Additional narrative, if applicable:***

The City reserves the right to adjust the funding by category presented above based on the types of proposals it receives from its community partners and interested developers. The City will provide for public comment if changes to the funding presented above exceeds the thresholds for a substantial amendment as defined by the City’s adopted Citizen Participation Plan.

***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 current amount of unmet need is greater than the amount of resources available to meet those needs by several orders of magnitude. The historical average development cost for HOME-assisted units funded by the City is approximately \$175,000. Using this conservative number and the current gap identified above, the total cost to meet the gap in affordable housing totals \$1.3 billion dollars, which is over 400 times the amount of funding available through HOME-ARP.

The City's funding decisions are largely based on how much of an impact selected projects will be able to impact the current level of need and make permanent reductions to those levels of need. The City proposes to use HOME-ARP primarily for affordable housing and non-congregate shelter development. The remainder of the funding will help expand the availability of supportive services, capacity building, and operational support for stakeholders that are serving the qualified populations. The planning portion of the budget will be used to carry out the proposed actions described above to coordinate other resources, including private investment, to address the shortage of affordable housing units.

## **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:***

Based on the estimates provided above, the City estimates it can subsidize the development of 20 to 25 affordable units, including those in non-congregate shelters.

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

The City proposes to subsidize the development of approximately 12 non-congregate shelter units and an additional 12 to 13 rental units affordable to households earning less than 30% of area median income. This affordable housing production goal directly addresses the lack of affordable rental housing for this income category.

## **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:***

- 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).
- PJs are not required to describe specific projects to which the preferences will apply.

The City does not expect to provide any preferences among the qualified populations. If the City subsidizes a development that will serve a specific population, such as veterans housing, it will ensure that the tenant selection policy complies with the Fair Housing Act.

***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 category of qualifying population, consistent with the PJ's needs assessment and gap analysis:*

Not applicable.

*If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:*

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. The City does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***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. The City does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***  
Not applicable. The City does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***  
Not applicable. The City does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

Not applicable. The City does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

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

Not applicable. The City does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.