

# 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:** State of Florida (Florida Housing Finance Corporation)  
**Date:** 12/17/2021

## Consultation

### *Summarize the consultation process:*

As Florida’s state housing finance agency, Florida Housing Finance Corporation (Florida Housing) serves as the administering entity leading the state’s participating jurisdiction for the federal Home Investment Partnerships (HOME) program. On November 5, 2021, Florida Housing issued the attached listserv

announcement to its *MultifamilyPrograms* and *SpecialNeeds* listservs, which include 1,370 members and 882 members, respectively. The members of these listserv groups represent stakeholders from affordable rental and permanent supportive housing developers and providers (both for-profit and non-profit partners), state and local advocacy groups, homeless services providers, and community leaders that serve vulnerable populations (including but not limited to survivors of domestic violence, McKinney-Vento homeless education liaisons, individuals with intellectual and/or developmental disabilities, NAMI members, etc.). Additionally, this communication was forwarded to each of Florida's 27 local homeless Continuum of Care lead agencies, the statewide Council on Homelessness, the Florida Coalition to End Homelessness, the Florida Supportive Housing Coalition, the Florida Housing Coalition, Coalition of Affordable Housing Providers, public housing authorities throughout Florida, the Florida Department of Children & Families Domestic Violence program office, the Florida Council Against Sexual Violence, and an advisory workgroup that was convened earlier in 2021 to lead a statewide Needs Assessment for homeless and special needs households in Florida. Beyond the listserv announcement, Florida Housing publicly noticed the Consultation workshop through numerous channels including, the Florida Administrative Register, the Florida Housing social media pages, and on multiple webpages within the Florida Housing website.

On December 2, 2021, Florida Housing convened a virtual public meeting to solicit input and consult with key stakeholders that serve and support qualifying populations identified in the HOME guidance issued by HUD in September 2021. This meeting was recorded and a link to the recording is posted on the Florida Housing HOME-ARP webpage ([https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-\(home\)-from-the-american-rescue-plan-act-\(home-arp\)](https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-(home)-from-the-american-rescue-plan-act-(home-arp))).

At this meeting Florida Housing provided an overview of HOME-ARP; discussed the eligible uses of funds identified within the guidance provided by HUD; reviewed the eligible qualifying populations identified by HUD; examined the gaps and needs of these qualifying populations based on a comprehensive statewide Needs Assessment conducted by the Corporation for Supportive Housing; and described the required components of the HOME-ARP allocation plan including an anticipated timeline for submitting the plan. A copy of the meeting agenda is attached as a reference point for review.

During this Consultation, Florida Housing solicited questions, comments, and feedback about the eligible uses of funds as allowed by HUD. Attached is a list of participants from this Consultation meeting including the organization represented. Additional attachments include comments provided during the consultation meeting as well as written consultation provided prior to the official public participation window opening. At this point Florida Housing staff incorporated all applicable verbal and written consultation feedback into an updated draft of the allocation plan. This new draft was made available for public participation and comment beginning December 17, 2021.

Throughout the administration of the HOME-ARP, Florida Housing remains committed to continuing a dialog with stakeholders about the ongoing needs of the qualifying populations. Florida Housing will continue to solicit feedback from and educate key stakeholders on the status of HOME-ARP funding through its role as a statutorily identified member of the state Council on Homelessness, and as the Chair of the Council's Affordable Housing Committee.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.

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

The Consultation Process included 190 individuals representing 100 different organizations/groups.

A full table of participants is attached as a pdf.

## 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 - 12/17/2021 end date - 1/7/2022
- ***Public hearing:*** 1/11/2022

Florida Housing posted a draft of the Allocation Plan on its website. This draft of the plan included all applicable feedback received during the Consultation process. Using the same methods to solicit input during the Consultation process, Florida Housing notified the public that this plan was available for review and the process by which to submit written comments.

Additionally, on January 11, 2022, Florida Housing scheduled a Public Hearing to address comments received and requested new comments. This meeting was recorded and a link to the recording is posted on the Florida Housing HOME-ARP webpage ([https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-\(home\)-from-the-american-rescue-plan-act-\(home-arp\)](https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-(home)-from-the-american-rescue-plan-act-(home-arp))).

At this Public Hearing Florida Housing reviewed the HOME-ARP timeline, including federal milestones and events/activities Florida Housing has taken up to this point; summarized the eligible uses of funds and qualifying populations; and discussed the required components of the HOME-ARP Allocation Plan. A copy of the meeting agenda is attached as a reference point for review.

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

Florida Housing communicated with the Department of Economic Opportunity – the state partner responsible for submitting the HUD Consolidated Plan and the Annual Action Plans – to include their partnering individuals and organizations in the public participation period.

Additionally, Florida Housing conducted a virtual Consultation workshop and a virtual Public Hearing provide an opportunity for public participation across the state.

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:***

All written comments/questions received during the Consultation Period and the Public Participation are posted on the Florida Housing HOME-ARP webpage ([https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-\(home\)-from-the-american-rescue-plan-act-\(home-arp\)](https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-(home)-from-the-american-rescue-plan-act-(home-arp))) and attached.

Written comments provided prior to the Public Participation period (before December 17, 2021) addressed where HOME-ARP funds would be distributed; the eligibility of households to be served; and eligible uses of funds with recommendations to target tenant-based rental assistance, permanent supportive housing, and homeownership strategies.

Written comments provided during the identified Public Participation period above (December 17, 2021 – January 7, 2022) addressed qualifying populations, the eligible uses of funds, geographic locations to target HOME-ARP funding, and identifying potential recipients of funds.

Comments provided at the Public Hearing on January 11, 2022 included concerns shared by homeless advocacy groups and local homeless Continuum of Care lead agencies. Specific items included preferences for certain qualifying populations, eligible uses of funds, and project-specific recommendations for individualized applications and projects.

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

Florida Housing found many comments were very detailed and specific in nature. These comments will be further discussed during individual workshops for any applicable competitive solicitation featuring HOME-ARP funds. In these cases the detailed nature of these comments did not fit into questions asked in the HOME-ARP Allocation Plan template.

Another written comment proposed using HOME-ARP funds to support homeownership strategies for households at 80% or below the area median income. Florida Housing communicated with the organization that submitted this comment to explain the eligible uses of funds identified in the HUD Notice CPD-21-10 and note that homeownership strategies are not eligible uses under HOME-ARP.

Two comments provided (one written, one verbal) addressed funding for Supportive Services. The state agency (Florida Department of Children and Families) that currently provides funding for homeless services has recently introduced several new initiatives aimed at providing and connecting vulnerable households with supportive services. To avoid unnecessary duplication of services, Florida Housing has not allocated funding to this category at this time.

## **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

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	#	#	#	#	#								
Transitional Housing	#	#	#	#	#								
Permanent Supportive Housing	#	#	#	#	#								
Other Permanent Housing						#	#	#	#				
Sheltered Homeless						#	#	#	#				
Unsheltered Homeless						#	#	#	#				
<b>Current Gap</b>										#	#	#	#

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

### OPTIONAL Housing Needs Inventory and Gap Analysis Table

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

**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:***

HUD defines qualifying populations as (1) homeless; (2) at risk of homelessness; (3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; and (4) other populations, including other families requiring services or housing assistance to prevent homelessness, and at greatest risk of housing instability.

In September 2020, Florida Housing partnered with the Corporation of Supportive Housing to complete a comprehensive state-level Needs Assessment to identify the statewide affordable and permanent supportive housing needs of homeless and special needs households, as well as perform financial modeling to address the housing development costs necessary for meeting the identified housing needs. Data tables from this Needs Assessment are attached to this allocation plan for reference.

For reference, special needs households are defined in Florida Statute as an adult with a disabling condition that requires supportive services to live independently; youth aging out foster care; survivors of domestic violence; or a person receiving benefits under the Social Security Disability Insurance (SSDI) program or the Supplemental Security Income (SSI) program or from veterans' disability benefits.

The advisory group for this Needs Assessment included representatives from the following organizations: the Florida Department of Children and Families Office of Substance Abuse and Mental Health, the Florida Agency for Persons with Disabilities, the Florida House of Representatives, NAMI Advocacy Group, the Florida Supportive Housing Coalition, the Florida Council on Homelessness, the University of Florida's Shimberg Center for Housing Studies, the Florida Housing Coalition, the Florida Coalition to End Homelessness, the ARC of Florida, and Youth and Family Alternatives.

As part of this statewide evaluation, Florida Housing was able to look at detailed subpopulations that fit into the qualifying populations outlined in the HOME-ARP guidance issued by HUD in September 2021. These subpopulations include Homeless (individuals experiencing chronic homelessness, individuals experiencing non-chronic homelessness, and families experiencing homelessness); At-risk of Homelessness (families living doubled up or in hotels/motels, individuals exiting prison, youth aging out of foster care, and individuals with severe and persistent mental illness and/or substance use disorders in residential or inpatient treatment settings); Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking (survivors of domestic violence); and Other Populations (persons with intellectual/developmental disabilities requiring independent living services, child welfare-involved families with an adult with special needs, and individuals and families receiving SSDI/SSI/Veterans Disability Benefits). The identified *households* for each qualifying population are as follows: Homeless (21,837); At-risk of Homelessness (51,419); Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking (1,600); and Other Populations, including Other Families Requiring Services or Housing Assistance to Prevent Homelessness, and Households at Greatest Risk of Housing Instability (82,106). Duplication across qualifying populations is accounted for and removed wherever possible, creating what in some cases may be considered an underrepresentation (i.e., Some households Fleeing a Domestic Violence are likely included in other qualifying populations, such as Homeless or At-risk of Homelessness.).

***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:*

Findings from the Needs Assessment conducted by the Corporation for Supportive Housing for Florida Housing show an estimated 156,962 homeless and/or special needs households have a need for either supportive or affordable housing. An estimated 70,756 households experiencing or at-risk of homelessness in Florida were identified as needing housing. Many of the households that need assistance to prevent homelessness, or those at the greatest risk of housing instability, are identified in the persons with special needs categories described above. These subpopulations account for an estimated 86,206 households in need of either supportive or affordable housing.

Detailed projections from this Needs Assessment show the unmet housing needs of the qualifying populations as follows:

- Homeless
  - Affordable Housing Need: 15,297
  - Supportive Housing Need: 6,540
- At risk of homelessness
  - Affordable Housing Need: 48,403
  - Supportive Housing Need: 3,016
- Other populations
  - Affordable Housing Need: 78,931
  - Supportive Housing Need: 3,175

The financial modeling included in the Needs Assessment estimates that it would cost approximately \$36.32 billion to create enough new supportive housing and affordable rental housing units for the number of households identified in this study.

***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 state of Florida – including state and local government partners, and homeless and housing services organizations – have actively worked to ensure that vulnerable households have been able to access supports and services, including rental assistance throughout the COVID-19 pandemic. Shortly after the passage of the CARES Act, Florida’s Governor committed \$250 million of Coronavirus Relief Funds to keep vulnerable households stably housed. In addition, many local governments also immediately started rental assistance programs using their allotment of these resources. The Florida Department of Children and Families was the statewide recipient of \$85.9 million in Emergency Solutions Grant (ESG-CV) funding that was deployed to assist households experiencing or at-risk of homelessness. ESG-CV funds have utilized a number of strategies to assist vulnerable households, including non-congregate sheltering, supportive services as allowed under the ESG-CV guidance, and rental assistance in the form of Rapid Rehousing. Recent reports from this administering entity identify current expenditures of the



state's ESG-CV allocation at \$44.3 million (51.5% of its total award). In late 2021 as part of the Consolidated Appropriations Act passed by Congress and signed into law, state administering agencies in Florida received \$871.2 million of Emergency Rental Assistance (ERA) program dollars, and \$676.1 million in Homeowner Assistance Funds (HAF). To date, the state administering agency for the ERA program reports having expended \$302.9 million (34.7%) of its ERA-1 allocation. The state has not expended any of its \$296.2 million ERA-2 allocation.

The current expenditure activity for housing-related services and supports with the various COVID-related funds identified above helps to explain the needs of existing tenant-based rental assistance and supportive services for qualifying populations.

Florida Housing has standing relationships with many partners that can help deploy strategies that will benefit the qualifying populations. For example, Florida Housing works with public housing authorities and local government housing offices to provide tenant-based rental assistance for eligible households using both state and federal funds, while also coordinating more than a dozen competitive RFAs which include a diverse pool of state and federal funds to finance and develop affordable rental housing for vulnerable populations, including households at risk of or experiencing homelessness.

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

When examining the latest data available through the Annual Homeless Assessment Report (AHAR), there are several key data points that stand out. The average HMIS bed utilization rate for Emergency Shelter, Transitional Housing, and Safe Haven beds in Florida since 2011 is 74.1%. The median percentage during this same time is 73.8%. Within the last decade (since 2011), the highest level of HMIS participation rate for Emergency Shelter, Transitional Housing, and Safe Haven beds was in 2012 at 78.1%. The latest year available (2020) showed the use of Emergency Shelter, Transitional Housing, and Safe Haven beds at 74.7%.

Conversely, when examining Occupancy Rates for affordable rental housing properties financed through Florida Housing there is very limited unit availability, with monthly occupancy rates in the past year fluctuating between 97% and 98% statewide. Based on the data available, the current emergency shelter and transitional housing system has historically and is currently operating below the available bed capacity, while data from the Florida Housing occupancy reports show that permanent affordable rental housing is at or nearing capacity.

***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 Needs Assessment recently conducted and used for the HOME-ARP allocation plan, noted “in Florida, a variety of interventions exist to support individuals and families facing a housing crisis who are experiencing homelessness and/or have special needs that require unique approaches to ensure housing stability.” A copy of this Needs Assessment can be found at

<https://www.floridahousing.org/programs/special-needs-housing-overview/research-publications>.

Florida Housing included the following subpopulations in its Needs Assessment – persons with intellectual and/or developmental disabilities; survivors of domestic violence; child welfare involved

families with an adult with special needs; youth aging out of foster care; and individuals and families receiving SSDI, SSI, or Veteran disability benefits – because many of these households experience vulnerabilities or compounding issues related to housing stabilization and self-sufficiency. When examining the complexities of these households it becomes evident that there are many exacerbating factors that place these households at risk of homelessness and/or needing additional supports and services necessary to prevent homelessness and maintain housing stability.

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

Florida has been extremely fortunate to have resources available that have provided unstably housed individuals and families with rental assistance and/or supportive services since the beginnings of the COVID-19 pandemic in early 2020. Resources such as ESG-CV, ERA, and Coronavirus Relief Funds have provided and continue to provide critical stabilizing supports for households at risk of eviction or foreclosure. Where many communities are expanding the eligible uses of ESG-CV and the statewide efforts relating to ERA are increasing access for more and more households, a consistent message is emerging that there is a tremendous need for additional affordable rental housing units statewide. Data from the Needs Assessment and Florida's triennial Rental Market Study shows a vast gap in the availability of affordable rental housing statewide. (A copy of the Rental Market Study can be found at <https://www.floridahousing.org/programs/special-needs-housing-overview/research-publications>.) Programs such as ESG-CV and ERA are not structured in a way to address Florida's limited availability of affordable rental housing, however the HOME-ARP program is. HOME-ARP makes the development and support of affordable rental housing a key strategy in addressing the needs these vulnerable households face.

***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 housing needs of the qualifying populations were determined through the third-party Needs Assessment conducted by the Corporation for Supportive Housing. Tables from the Needs Assessment are attached to this plan. A copy of the full Needs Assessment and corresponding data sets can be found at <https://www.floridahousing.org/programs/special-needs-housing-overview/research-publications>.

Shelter data presented in the questions above was determined by examining the latest AHAR data available from HUD at <https://www.huduser.gov/portal/datasets/ahar/2020-ahar-part-1-pit-estimates-of-homelessness-in-the-us.html>.

Affordable rental housing occupancy reports and data were collected from <https://www.floridahousing.org/data-docs-reports/occupancy-reports> and occupancy rates were calculated based upon monthly submissions using the number of occupied units divided by the total number of units for reporting properties.

Financial and service delivery information was provided from the administering agencies for the ESG-CV and ERA programs.

## **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:***

Florida Housing solicits applications to fund the new construction or acquisition and rehabilitation of rental developments to create new affordable rental housing units through a series of Requests for Applications (RFAs) that are tailored to specific development criteria such as geographic areas of location, areas of opportunity and demographic commitments. Applications are processed by Florida Housing staff in accordance with specifications set forth in each RFA and are selected for funding via publicly held Review Committee Meetings before being submitted to Florida Housing's Board of Directors for final approval. Upon final approval from its Board of Directors, Florida Housing invites selected Applicants to engage in credit underwriting for RFAs related to the creation of affordable rental housing.

***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. Florida Housing will not make HOME-ARP funds available prior to approval of the allocation plan by HUD.

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	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 5,000,000		
Development of Affordable Rental Housing	\$ 62,500,000		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 4,403,340	6.1 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 71,903,340</b>		

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

Florida Housing intends to allocate \$62,500,000 (86.9%) to the development of affordable rental housing, \$5,000,000 (7.0%) toward tenant-based rental assistance, and \$4,403,340 (6.1%) for administrative costs. Activities included in the development of affordable rental housing include the

development hard costs, acquisition, and related soft costs. Tenant-based rental assistance specifically provides rental assistance, security deposits, and utility deposits. Administrative costs are expected to include staffing costs and other associated costs to ensure necessary compliance and technical assistance to support nonprofit partners working to build capacity among these organizations. Technical assistance will include direct support for these nonprofit partners and in the development of affordable and permanent supportive rental housing.

***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:***

Based on the limited availability of affordable rental housing units in the Florida Housing Occupancy Reports and the findings identified in the Needs Assessment conducted, the need for the development and support of affordable rental housing is a critical need in Florida. Coupling these results with the remaining funds and expansion efforts included in ESG-CV and ERA program activities that provide services that are duplicative of other allowable costs, data suggests the greatest needs include affordable rental housing and targeted tenant-based rental assistance.

Florida Housing has not allocated funding to the Supportive Services category at this time, in order to avoid unnecessary duplication of services and supports that are currently available through the state agency that administers funds for homeless services (Florida Department of Children and Families). Additionally, this state entity has recently introduced new initiatives aimed at providing and connecting vulnerable households with supportive services.

Florida Housing is also committed to using administrative funds to support its nonprofit partnering organizations with training and technical assistance needed to effectively implement programs that can serve the qualifying populations 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:***

Florida Housing estimates that the amount allocated to the Development of Affordable Rental Housing category can create approximately 480 units.

***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:***

New affordable rental housing units created with HOME-ARP funding will target eligible households across the qualifying populations and provide a number of affordable and permanent supportive housing solutions throughout Florida. Florida Housing anticipates using existing (and possible new) RFAs and approaches to create these new affordable rental housing solutions. Through this multifaceted approach, the number of HOME-ARP funded units will vary across communities based upon need and the ability to combine HOME-ARP with other resources to support developments. Florida Housing intends to include HOME-ARP funds in its existing RFAs that specifically focus on the creation of

permanent affordable housing for households experiencing homelessness, as well as existing RFAs that include a set-aside for homeless households. Additionally, Florida Housing anticipates using HOME-ARP funds in new RFAs to create new units through multiple strategies in a way that will create more integrated communities for the qualifying populations.

## **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.

Florida Housing does not intend to narrow the scope of qualifying populations with a “preference”, but instead work to serve as many households as possible across all qualifying populations with its HOME-ARP funding. Florida Housing will work with stakeholders to ensure that qualifying populations are served and will benefit from HOME-ARP funds in all competitive solicitations (e.g., RFAs, etc.) in which HOME-ARP dollars are included.

***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:***

By incorporating HOME-ARP funding into Florida Housing’s traditional RFA schedule, funding will be dedicated to incorporating units specifically identified for qualifying populations into Florida Housing-financed affordable rental housing developments. Integrating qualifying populations into mainstream affordable rental housing solutions allows these vulnerable populations to become part of a community without the stigma of being isolated or creating concentrated areas of poverty.

***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:***

Florida Housing does not intend to specifically target a single qualifying population with a “preference”, and because it will commit to integrating HOME-ARP funds into many of its competitive solicitations, Florida Housing will be able to utilize these funds to create more integrated development communities. The ability of Florida Housing to rapidly integrate this funding into already planned RFAs will expedite the ability to deploy HOME-ARP funds across the state and strategically ensure that the development of affordable rental housing targets the qualifying populations.

In response to emerging and evolving affordable housing needs, Florida Housing continually updates its existing practices for issuing RFAs and develops and issues new RFAs on a regular basis. This will allow Florida Housing to customize the distribution of HOME-ARP funds through a variety of strategies and best serve the identified qualifying populations.

## 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***

The findings of the Needs Assessment and Gaps Analysis used by Florida Housing show a significant gap in the number of affordable rental housing units available. Therefore, Florida Housing does not intend to allocate HOME-ARP funds for the purpose of refinancing existing affordable rental housing units at this time.

- ***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 as Florida Housing does not currently intend to allocate HOME-ARP funding to refinance existing affordable rental housing units.

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

Florida Housing does not currently intend to allocate HOME-ARP funding for the purposes of refinancing existing affordable rental housing units, but rather focus on new construction of affordable rental housing.

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

Not applicable as Florida Housing does not intend to allocate HOME-ARP funding for the purposes of refinancing.

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

Florida Housing does not intend to allocate HOME-ARP funding for refinancing.

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

Enter narrative response here.

## **A. Consultation Listserv Announcement**

## Zach Summerlin

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**From:** Multifamily Programs <MULTIFAMILYPROGRAMS@LISTSERV.FLORIDAHOUSING.ORG>  
on behalf of Multifamily Allocations <Multifamily.Allocations@FLORIDAHOUSING.ORG>  
**Sent:** Friday, November 5, 2021 11:33 AM  
**To:** MULTIFAMILYPROGRAMS@LISTSERV.FLORIDAHOUSING.ORG  
**Subject:** Announcing Workshop regarding HOME from the American Rescue Plan Act (HOME-ARP)



Florida Housing will host a workshop on Thursday, December 2, 2021, beginning at 2:00 p.m. regarding Home Investment Partnerships Program (HOME) from the American Rescue Plan Act (HOME-ARP).

On April 8, 2021 HUD announced the HOME-ARP allocations for participating jurisdictions and that guidance for use of the funds would be released in Fall 2021. Florida Housing Finance Corporation was awarded \$71,903,340 as the recipient of the state's non-entitlement allocation. This funding is to provide homelessness assistance and supportive services through the following activities:

- Development and support of affordable housing, as currently permitted under the HOME program;
- Tenant-based rental assistance;
- Supportive services, including activities such as transitional housing, housing counseling, and homeless prevention services; and/or
- Acquisition and development of non-congregate shelter units, which may be converted to permanent affordable housing, used as emergency shelter, or remain as non-congregate shelter units.

This workshop will be available by webinar. Registration for the webinar is required and is available on the webpage [https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-\(home\)-from-the-american-rescue-plan-act-\(home-arp\)](https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-(home)-from-the-american-rescue-plan-act-(home-arp)). The agenda for the workshop will be posted to the website prior to the workshop. A Listserv will be issued when this information is available.

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<https://LISTSERV.FLORIDAHOUSING.ORG/scripts/wa-FLAHOUSE.exe?SUBED1=MULTIFAMILYPROGRAMS&A=1>



## **B. Consultation Workshop Agenda (December 2, 2021)**

## **Florida Housing Finance Corporation**

### **HOME-ARP Allocation Plan Workshop Agenda**

**Registration for Workshop is required. Registration information is available at**

**([https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-\(home\)-from-the-american-rescue-plan-act-\(home-arp\)\)](https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-(home)-from-the-american-rescue-plan-act-(home-arp))))**

#### **Welcome**

- A. Introductions
- B. Purpose of Workshop

Florida Housing Finance Corporation is the state recipient for the federal HOME Investment Partnerships Program (HOME). This workshop will solicit consultation regarding the state's HOME-American Rescue Plan (HOME-ARP) Allocation Plan prior to submission to HUD for approval.

#### **Overview of HOME-ARP**

- A. Background

In March 2021 Congress passed and the President signed the American Rescue Plan Act (ARP), a federal economic stimulus bill, into law. The ARP provided \$5 billion in federal HOME funding, of which \$71.9 million dollars was allocated to the state of Florida. Florida Housing, as the administrator of HOME funding, will manage this special ARP funding.

- B. Uses of Funds

HOME-ARP funding is intended to provide homelessness assistance and supportive services through four activities:

1. Development and support of affordable housing, as currently permitted under the HOME program;
2. Tenant-based rental assistance;
3. Supportive services, including activities such as transitional housing, housing counseling, and homeless prevention services; and/or
4. Acquisition and development of non-congregate shelter units, which may be converted to permanent affordable housing, used as emergency shelter, or remain as non-congregate shelter units.

Not less than 70% of affordable rental housing units acquired, rehabilitated, or constructed with HOME-ARP funds must be occupied by households in the qualifying populations (see D. below). Units that are not restricted to occupancy by qualifying populations are subject to income targeting and rent requirements established under the HOME-ARP Rental Program rules and are only permitted in properties with rental units restricted for occupancy by qualifying populations. HUD is providing additional flexibilities to structure and underwrite HOME-ARP rental projects, so they remain financially viable during the minimum compliance period.

One hundred percent (100%) of HOME-ARP funds used for tenant-based rental assistance, supportive services, and acquisition and development of non-congregate shelter units must benefit individuals and families in qualifying populations.

- C. HUD Guidance

In mid-September HUD released Notice CPD-21-10 which provided guidance outlining the requirements for the use of funds in the HOME-ARP program. This guidance identified qualifying populations, instructions for completing the HOME-ARP Allocation Plan, eligible uses and activities under the HOME-ARP program, and other federal requirements. The CPD-21-10 Notice identifies the following as required components of a participating jurisdiction's HOME-ARP Allocation Plan:

- A summary of the consultation process and results of upfront consultation;
- 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;
- An assessment of unmet needs of each qualifying population;
- An assessment of gaps in housing and shelter inventory, homeless assistance and services, and 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 estimate of the number of housing units for qualifying populations the participating jurisdiction 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.

#### D. Qualifying Populations

In its September 2021 guidance, HUD identifies “qualifying populations” (below) to be served through HOME-ARP funding. Any individual or family who meets the criteria for these populations is eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria (e.g., additional income criteria). All income calculations to meet income criteria of a qualifying population or required for income determination in HOME-ARP eligible activities must use the annual income definition in 24 CFR 5.609 in accordance with the requirements of 24 CFR 92.203(a)(1).

- **Homeless**, as defined in 24 CFR 91.5 *Homeless* (1), (2), or (3);
  - (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
    - (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
    - (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
    - (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
  - (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
    - (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
    - (ii) No subsequent residence has been identified; and
    - (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
  - (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
  - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
  - (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
  - (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.
- **At risk of Homelessness**, as defined in 24 CFR 91.5 *At risk of homelessness*;
  - (1) An individual or family who:
    - (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
    - (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
    - (iii) Meets one of the following conditions:
      - A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
      - B. Is living in the home of another because of economic hardship;
      - C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
      - D. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
      - E. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
      - F. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
      - G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
  - (2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
  - (3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

- **Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**, as defined by HUD.

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

**Domestic violence**, which is defined in 24 CFR 5.2003 includes felony or misdemeanor crimes of violence committed by:

- (1) A current or former spouse or intimate partner of the victim (the term "spouse or intimate partner of the victim" includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
- (2) A person with whom the victim shares a child in common;
- (3) A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- (4) A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
- (5) Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

**Dating violence** which is defined in 24 CFR 5.2003 means violence committed by a person:

- (1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- (2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
  - (i) The length of the relationship;
  - (ii) The type of relationship; and
  - (iii) The frequency of interaction between the persons involved in the relationship.

**Sexual assault** which is defined in 24 CFR 5.2003 means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

**Stalking** which is defined in 24 CFR 5.2003 means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- (1) Fear for the person's individual safety or the safety of others; or
- (2) Suffer substantial emotional distress.

**Human Trafficking** includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102). These are defined as:

- (1) Sex trafficking means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or

- (2) Labor trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery; and
- **Other Populations** where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:
  - (1) **Other Families Requiring Services or Housing Assistance to Prevent Homelessness** is defined as households (i.e., individuals and families) who have previously been qualified as "homeless" as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.
  - (2) **At Greatest Risk of Housing Instability** is defined as a household who meets either paragraph (i) or paragraph (ii) below:
    - (i) Has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);
    - (ii) Has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets of the following conditions from paragraph (iii) of the "At risk of homelessness" definition established in 24 CFR 91.5:
      - A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
      - B. Is living in the home of another because of economic hardship;
      - C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
      - D. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
      - E. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
      - F. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
      - G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
  - (3) **Veterans and Families that Include a Veteran Family Member** that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

## HOME-ARP Allocation Plan

### A. Consultation

Florida Housing is seeking input from key stakeholders throughout the state in formulating strategies to best utilize the HOME-ARP funding provided. The intent of this Workshop is to incorporate feedback during the Workshop and from written comments provided throughout the following week, into a plan that directs

funding toward identified eligible activities that best meet the needs of qualifying populations through a strategic HOME-ARP Allocation Plan.

B. Public Comment & Participation

After this workshop, but before submitting the HOME-ARP Allocation Plan to HUD, Florida Housing will ensure a copy of the proposed HOME-ARP Allocation Plan, including comments and feedback provided during the HOME-ARP Allocation Plan Workshop, is posted and available for public comment for a period of no less than 15 days. Florida Housing will then work with the Department of Economic Opportunity to incorporate the HOME-ARP Allocation into the FFY2021 Annual Action Plan through a substantial amendment and submit it to HUD for approval.

C. HOME-ARP Allocation Plan Components

The HOME-ARP Allocation Plan must describe the distribution of HOME-ARP funds and the process for soliciting applications and selecting eligible projects. It must also identify any preference(s) established for eligible activities or projects. (Note: specific/selected applications that will be funded are not required to be identified in the HOME-ARP Allocation Plan.)

Below, each of the components are part of the HOME-ARP Allocation Plan, that must be completed by Florida Housing as outlined by the September 2021 guidance issued by HUD.

(1) Needs Assessment and Gaps Analysis

Florida Housing is required to evaluate the size and demographic composition of qualifying populations and assess the unmet needs of those populations. This must be done by identifying any gaps in the state's current shelter and housing inventory as well as the service delivery system.

Florida Housing recently completed a statewide needs assessment for households experiencing homelessness and persons with special needs. Florida Housing proposes to use the preliminary findings from this needs assessment to identify the needs and gaps for completion of this component of the Allocation Plan.

(2) HOME-ARP Activities

Within the HOME-ARP Allocation Plan, Florida Housing must provide details regarding its Request for Applications (RFA) processes related to the intended use of HOME-ARP funds. After this Consultation period Florida Housing will update the HOME-ARP Allocation Plan to include proposed funding levels for each of the eligible activities identified in the Overview section of this agenda which are based upon findings from the Needs Assessment and Gaps Analysis.

(3) HOME-ARP Production Housing Goals

As part of the HOME-ARP Allocation Plan, Florida Housing will need to provide estimates of the number of affordable rental housing units that will be created for qualifying populations as a result of this funding.

(4) Preferences

Florida Housing is asked to identify within the HOME-ARP Allocation Plan if it intends to give preference to one or more of the qualifying populations.

Based on Florida's HOME-ARP award, Florida Housing intends to not set specific prioritizations for certain qualifying populations, but rather utilize HOME-ARP funding to serve as many members of the HUD-permitted qualified populations as possible.

(5) HOME-ARP Refinancing Guidelines

HUD requires recipients that intend to refinance existing debt secured by multifamily rental housing that is being rehabilitated using HOME-ARP funds to provide a copy of the refinancing guidelines as part of the HOME-ARP Allocation Plan and accompanying substantial amendment.

The findings of the Needs Assessment and Gaps Analysis used by Florida Housing for the HOME-ARP Allocation, shows a significant need and gap in the availability of affordable rental housing. Therefore, Florida Housing does not intend to allocate HOME-ARP funding to refinance existing affordable rental housing units at this time.

**Next Steps**

Accept Consultation Feedback	December 14, 2021
Post HOME-ARP Allocation Plan	December 17, 2021
Public Comment Period Ends	January 4, 2022
Finalize HOME-ARP Allocation Plan (make recommendation to Board)	January 21, 2022
Submit Substantial Amendment to 2021 Annual Action Plan to HUD for Approval	January/February 2022



## **C. Consultation Participant Roster**

Agency/Org Consulted	Participant(s)	Type of Agency/Org	Method of Consultation	Feedback
42 Partners	Jorge Aguirre	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
90 Works	Anthony Sawyer	Homeless Services Provider	GoToWebinar Public Webinar	
Ability Housing	Andy Fink Elizabeth Deutsch Shannon Nazworth	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Affordable Homeownership Foundation	Lois Healy	Public Housing Authority	GoToWebinar Public Webinar	
Affordable Housing Solutions for Florida	Debra Fleming	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Alachua County	Jacqui McPhillips Sarai Cabrera	County Government	GoToWebinar Public Webinar	
Alachua County Housing Authority	Amanda Nazaro	Public Housing Authority	GoToWebinar Public Webinar	
Arbor Valley Communities	George Romagnoli	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Archway Partners	Brett Green Dave Heaslip	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Atlantic Pacific Communities	Anagha Jayaprakasan Julian Scheeff Ken Naylor Liz Wong Scott Kriebel	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Banyan Development Group	Yannan Cai Alex Kiss Christopher Koch Jeffrey Kiss	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Birdsong Housing	Steve Auger	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Blue Sky Communities	Geoff Harlan	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Boley Centers	Jack Humburg Jeri Flanagan	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Brevard County	Ian Golden	County Government	GoToWebinar Public Webinar	
Broward County	Linda Graham Sherita White	County Government	GoToWebinar Public Webinar	
Buchanan Ingersoll & Rooney	Suzanne Fejes Marnie George	Attorney/Consultant	GoToWebinar Public Webinar	
Burke Blue	Nevin Zimmerman	Legal Services Provider	GoToWebinar Public Webinar	
Carlos Toledo	Carlos Toledo	Affordable Housing Consultant	GoToWebinar Public Webinar	
Carrfour Supportive Housing	Stephanie Berman	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Catholic Charities, Diocese of Venice	Ann Fries Kristy Santana Sandi Rowland	Social Services Provider, Affordable Housing Provider	GoToWebinar Public Webinar	
Center for Progress & Excellence	Heather Cross	Behavioral Health Provider	GoToWebinar Public Webinar	
Centerstone	Hilary Carney Lee Fox Margaret Hogan Tara Martinson	Behavioral Health Provider	GoToWebinar Public Webinar	
Central Florida Behavioral Health Network	Luis Rivas	Behavioral Health Managing Entity	GoToWebinar Public Webinar	
Charlotte County	Colleen Turner Laurie Kimball	County Government	GoToWebinar Public Webinar	See attached comments
City of Clearwater	Terry Malcolm-Smith	City Government	GoToWebinar Public Webinar	
City of Lakeland	Annie Gibson	City Government	GoToWebinar Public Webinar	
City of Miami Beach	Marcela Rubio	City Government	GoToWebinar Public Webinar	
City of Norport	Jessica Meliti	City Government	GoToWebinar Public Webinar	
City of Pompano Beach	Alex Goldstein	City Government	GoToWebinar Public Webinar	
City of Port St Lucie	Mendy Solorzano	City Government	GoToWebinar Public Webinar	See attached comments
City of St Petersburg	Lowell Atkinson Stephanie Lampe	City Government	GoToWebinar Public Webinar	
City of West Palm Beach	Kim Spence	City Government	GoToWebinar Public Webinar	
Coalition for the Homeless of Pasco County	Don Anderson	CoC Lead Agency	GoToWebinar Public Webinar	
Collier County	Carrie Kurutz Donald Luciano Jacob LaRow	County Government	GoToWebinar Public Webinar	
Colvard Consulting Services	Alison Colvard	Affordable Housing Consultant	GoToWebinar Public Webinar	
Community Assisted & Supported Living	Ashelba Brown Brian Roskamp	Behavioral Health Provider, Affordable Housing Provider	GoToWebinar Public Webinar	
Comprehensive Housing Resources	Diana Bello	Housing Counseling Agency	GoToWebinar Public Webinar	
Cornerstone Group	Mara Mades	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Corporation for Supportive Housing	Deirdre Bolden Kara Mergl	Technical Assistance Provider	GoToWebinar Public Webinar	
Crestview Area Shelter for the Homeless	Traci Spears	Homeless Services Provider	GoToWebinar Public Webinar	
Crown Equities	Jack Brandt	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	

Dayspring Health	Doug Adkins	Behavioral Health Provider	GoToWebinar Public Webinar	See attached comments
Delray Beach Housing Authority	Mckena Dunn			
	Charmaine Jackson	Public Housing Authority	GoToWebinar Public Webinar	
	Maggie Perez			
Elder Options	Shirley Erazo	Senior Services Provider	GoToWebinar Public Webinar	
Elder Source	Kristen Griffis			
	Abigail Costley	Senior Services Provider	GoToWebinar Public Webinar	
	Terika Scatliffe			
Emeral Coast Regional Council	Ada Clark	Technical Assistance	GoToWebinar Public Webinar	
	Garett Griffin	Provider		
Escambia County	Clara Long	County Government	GoToWebinar Public Webinar	See attached comments
Family Promise of South Sarasota County	Jennifer Fagenbaum	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Flagler Health	Lindsey Rodea	CoC Lead Agency	GoToWebinar Public Webinar	
	Sally Reed			
Florida Coalition to End Homelessness	Leeanne Sacino	Homeless Advocacy Group	GoToWebinar Public Webinar	
Florida Housing Coalition	Amanda Rosado	Technical Assistance	GoToWebinar Public Webinar	
	Amanda Wander	Provider		
	Ashon Nesbitt			
Florida Housing Finance Corporation	Ravanna Riecss	Housing Finance Agency	GoToWebinar Public Webinar	
	Amanda Franklin			
	Bill Aldinger			
	Charles Jones			
	Chris McGuire			
	David Hines			
	David Merck			
	David Westcott			
	David Woodward			
	Diana Fields			
	Ebony Cargle			
	Elaine Roberts			
	Freebeau Swindle			
	Jenny Marshall			
	Kenny Derrickson			
	Kevin Tatreau			
	Lisa Nickerson			
	Lisa Walker			
	Matt Jugenheimer			
	Nancy Muller			
	Nicole Gibson			
	Ryan McKinless			
	Sheila Freaney			
	Tim Kennedy			
Gainesville Housing Authority	Tracy Willis			
	Malcolm Kiner	Public Housing Authority	GoToWebinar Public Webinar	
Glasser Schoenbaum Human Services Center	Charlene Altenhain	Homeless Services Provider	GoToWebinar Public Webinar	
	Christina Russi			
Goodwill Industries of Southwest Florida	Maran Hilgendorf	Social Services Provider	GoToWebinar Public Webinar	
Gorman & Company	Joel Reed	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
	Noah Gerencir			
Gulf Coast Partnership	Angela Hogan	CoC Lead Agency	GoToWebinar Public Webinar	
Habitat for Humanity, Broward County	Justine Morgan	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Habitat for Humanity, Florida	Barbara Beck	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	See attached comments
	Roxanne Young			
Habitat for Humanity, Lower Keys	Kristina Welburn	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Habitat for Humanity, Pasco County	Melissa Parks	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Haven Partners Group	Jaye Miller	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	See attached comments
Heart of Florida Health Center	Cindy O'Connor	Health Provider	GoToWebinar Public Webinar	
	Laketa Taylor			
	Rochelle Davila			
Hope Family Service	Sonva Price	Domestic Violence Services Provider	GoToWebinar Public Webinar	
	Lakisha Zanders			
Housing Authority for the City of Miami Beach	Michael OHara	Public Housing Authority	GoToWebinar Public Webinar	
Housing Authority of Pompano Beach	Cassandra Bell	Public Housing Authority	GoToWebinar Public Webinar	
Housing Trust Group	Jason Larson	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	See attached comments
	Rodrigo Paredes			
Indian River County	John Stoll	County Government	GoToWebinar Public Webinar	See attached comments
	Robin Miller			
Landmark Companies	Francisco Rojo	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
	Nicole Rojo			
Lee County	Carolina Alcantara	County Government	GoToWebinar Public Webinar	
	Clare Molloy			
	Kim Hustad			
Lee County Housing Development Corporation	Mindy Willis	Housing Counseling Agency	GoToWebinar Public Webinar	
	Erika Cooks			
Lee County Schools	Twaski Jackson	School District	GoToWebinar Public Webinar	
Magnify	Erin Dalla Costa	Consultant	GoToWebinar Public Webinar	
	Valena Scott			
Martin County	Dawn Cobb	County Government	GoToWebinar Public Webinar	

McDowell Properties	Angie Vazquez Danny Lopez Gabriel Duarte Nik Echeverria Sean Smith	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Mid Florida Homeless Coalition	Amber Tucker Tomi Steinruck	CoC Lead Agency	GoToWebinar Public Webinar	
National Core	Ariana Brendle Traies Roe	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Nelson Mullins	Yisell Rodriguez	Attorney/Consultant	GoToWebinar Public Webinar	
New Direction Re-entry Center of Marion	Laresa Scott	Social Services Provider	GoToWebinar Public Webinar	
Nonprofit Executive Alliance of Broward	Sandra Einhorn	Nonprofit Advocacy Provider	GoToWebinar Public Webinar	
Ocala Housing Authority	Judith Houlios	Public Housing Authority	GoToWebinar Public Webinar	
Orange County	Sarah Elbadri	County Government	GoToWebinar Public Webinar	See attached comments
Osceola County	Elizabeth Rich	County Government	GoToWebinar Public Webinar	
Palm Beach County	Daniel Ramos	County Government	GoToWebinar Public Webinar	See attached comments
Palm Beach County Housing Authority	Tammy McDonald	Public Housing Authority	GoToWebinar Public Webinar	
Polk County	Cedric Cox Idalia Gonzalez Nancy Hurlev	County Government	GoToWebinar Public Webinar	see attached comments
Providence Family Life Center	Antoinette Kruse	Behavioral Health Provider	GoToWebinar Public Webinar	See attached comments
Provident Housing Solutions	Hank Dunn	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
REVA Development Corporation	Lynda Harris	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Royal American	Oscar Paul	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Salvation Army	Andrew Brady Terryrn Streets	Social Services Provider, Affordable Housing Provider	GoToWebinar Public Webinar	
St Theresa Catholic Church	Donna Ramirez	Religious Organization	GoToWebinar Public Webinar	
TAG Associates	Jane Dixon	Consultant	GoToWebinar Public Webinar	
Tapestry Companies	Derek Brandt Richard Bienapfl Susan Veeder	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
The First Bank	Brandy Robinson	Banking/Financial Institution	GoToWebinar Public Webinar	
United Way of Lee County	Linda Hafner	Nonprofit Fundraising Organization	GoToWebinar Public Webinar	
United Way of Marion County	Beth Nelson	Nonprofit Fundraising Organization	GoToWebinar Public Webinar	
Volunteers of America	Kera Beard	Social Services Provider, Affordable Housing Provider	GoToWebinar Public Webinar	
Volusia County	Carmen Hall Adrienne Williams Ann Sprague Brad Satterwhite Carl Baxter Corry Brown Donna Alger James Brooks Liza Brandt Marcella Levin Pamela Phillips Robert Vargas Tracy -	County Government General Public	GoToWebinar Public Webinar GoToWebinar Public Webinar	

## **D. Consultation Workshop Verbal Questions & Comments**

## Comments received from the HOME-ARP Allocation Plan Consultation Workshop

(held December 2, 2021)

1. We should not forget that some of our areas lack capacity. We have this discussion in our Walton County housing group and there is little capacity as far as a nonprofit that can manage affordable housing, so a multifamily complex is out of the question at this moment for us. We should allow some single family options that are appropriate for this population and that all of the funding doesn't get set aside for multifamily housing only.

Also, I manage the rapid rehousing and prevention program, and this looks like it will operate the same way.

An additional concern is who can apply for this funding and how we can maximize it across communities that lack capacity.

Are you looking to have Continuums of Care double dip and come into this for funding?

*Ada Clark, Emerald Coast Regional Council*

2. Administrative funding for staff or additional staff to seek local housing to drop centers to provide for some housing component, not just a shower and eat opportunity. You have nonprofits who want to create more housing that know exactly where the needs are, know where the truly homeless people are coming to get a shower and a meal but then are going back out to the street into a tent or are trying to sleep in a chair there at that center, so having some administrative supports there and funding to help with increasing capacity building just to provide those units, I think would be really critical, I know specifically in the Orange County area there are a number of them that if they just had some more support administratively they'd be able to focus, secure the contracts for the land, and move forward in providing homeless housing for people going back to a tent.

Are houses and duplexes allowed as currently reflected under this HOME-ARP activity?

Are there restrictions from combining these funds with SAIL funds?

*Alison Colvard, Colvard Consulting Services*

3. If you do layer the funds with other sources, would the overall project have the same 70% requirements or would that be based on the percentage of funding?

*Andy Fink, Ability Housing*

4. I want to second Colleen's thoughts on having this money for non-entitlement communities.

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Harold "Trey" Price, Executive Director

Please consider the TBRA rental rates. At the moment they are lower than the fair market rent and we are struggling to find available units at fair market rent, so raising those limits would have an impact on us locally in finding housing.

My question is about preference. Is there going to be any preference to serving literally homeless households as opposed to those who are at-risk? It could be easy for this money to just become part of low-income housing rather than really to serve homeless.

I had a question about the refinancing and new development. Is there be a requirement for an agreement with the CoC? Would it be similar to Link units? Just encouraging that there be better communication between the developer, the CoC, and Florida Housing about making sure those units are maintained for the intended population.

*Angela Hogan, Gulf Coast Partnership*

5. Is the needs assessment available for public distribution?

There are many conversations about student loan debt and social safety nets for individuals pursuing a post-secondary education. In California a bill was defeated in legislation called the Safe Parking Bill which had to do with creating safe spaces for students who are homeless living in their cars. I am wondering if the needs assessment has identified this population because what we know from research is that 3 in 5 college students face some sort of basic needs insecurity in 2020. Two-year college students consistently report higher rates of housing and food insecurity and those at highest risk of basic needs insecurity include the LGBTQ community and indigenous students. I would request we look a little closer at this population that tends to be embedded in these other qualifying groups.

*Antoinette Kruse, Providence Family Life Center*

6. Is there a timeline to submit an Allocation Plan?

*Clara Long, Escambia County*

7. Charlotte County respectfully requests that the \$71.9 million in HOME ARP funds allocated to Florida Housing Finance Corporation for statewide distribution be **preserved or, at minimum, prioritized for non-entitlement communities that did not receive a direct allocation of HOME ARP funds**. Non-entitlement communities should not have to compete for funding with entities that received a direct allocation. Our opportunities for funding are limited enough as it is.

*Colleen Turner, Charlotte County*

8. We are interested in whether these funds can be used for supportive housing or independent housing for seniors who are at-risk.

Does it matter is the apartment style housing arrangements versus other innovative options or other innovative proposals that would fill a gap in the housing continuum in this part of Florida.

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Harold "Trey" Price, Executive Director

When do you anticipate the application or allocation process getting under way and we do you hope to have these funds available?

Can these funds be used to help with state licensed ALFs with improvements who serve low-income residents with mental illnesses?

Can the funds be used for construction of supportive housing projects?

Can for profit companies apply for these funds?

Can the funds be used to support construction of a licensed residential treatment facility?

How many sq feet do units have to be to meet the criteria for the funding?

*Doug Adkins, Dayspring Health*

9. Will the corporation consider there might be developments that haven't commenced construction but they say that they're going to commence construction sometime in the next 12 to 24 months, but the wheels have been set in motion for those developments. Would you consider those types of developments to be eligible to apply for these types of funds?

Would you say that as any other HOME dollars these funds will be subject to the same type of items such as HUD environmental reviews, Davis-Bacon, and all those other things that usually come along with the HOME program, would they apply here as well?

That could affect whether you can in fact make these funds available for a development depending on their standing in terms of the development process that could affect whether they'll be eligible or not. That may be something you want to consider because those who are eligible you may want to give them an opportunity that way you can get the housing quicker.

*Francisco Rojo, Landmark Companies*

10. What is available for seniors as assistance in paying property taxes?

*Jaye Miller, Haven Partners Group*

11. Public housing authorities have HUD-VASH and Emergency Rental Assistance Vouchers that can't be used right now in the communities because there's no units in the community. Just want to make sure that is noted in the needs assessment.

I want to make sure that when serving individuals experiencing homelessness, we are looking at the application process to ensure that it is an open application process and that we are not screening people out at entry.

*Leeanne Sacino, Florida Coalition to End Homelessness*

12. Will there be any programs for people that are over the 50% income limit but cannot afford raised rent and therefore live in a hotel/vehicle?

*Mendy Solorzano, City of Port St. Lucie*

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13. I am with Polk County Housing and Neighborhood Development. We were looking at running our HOME ARP process at the same time as your process in order to leverage your HOME ARP funds and our County HOME ARP funds. This would be an opportunity to leverage both funding sources for our local projects. We are planning an RFP process in the near future. What are your thoughts on this idea?

*Nancy Hurley, Polk County*

14. Will there be an opportunity to address sustainability for ongoing rental supports for persons at or below 30% AMI?

TBRA doesn't always work if the owner of the rental units can raise rents which make units non-sustainable, regardless of how much money there is. Or the property owner can sell the properties because they do not want to deal with tenants.

*Robin Miller, Indian River County*

15. Does Florida Housing have the intention to use some of this money for new construction to meet these goals and provide this type of housing?

I think could be a good opportunity to use these funds to develop affordable housing, new construction, and of course if this can be combined with 4% tax credits or something like that or even 9% tax credits and also some SAIL.

*Rodrigo Paredes, Housing Trust Group*

16. Are there any funds for affordable homeownership?

*Roxanne Young, Habitat for Humanity Florida*

17. For the construction of affordable housing, have you read the tenant protection requirements? Will there be additional dollars provided from another funding source to make these developments financially sustainable during the compliance period?

Cannot terminate tenancy or refuse to renew lease of tenant of HOME-ARP unit except for serious or repeated violations of lease terms/conditions

Cannot terminate tenancy or refuse to renew lease with qualifying household for inability to pay rent during compliance period

*Sarah Elbadri, Orange County*

18. I represent the Palm Beach County Housing Authority and we naturally serve the populations of 30% of AMI as well as 50% of the AMI. We receive dozens of calls daily from people living in their cars, some with children, living in hotels and couch surfing. Public housing has been underfunded for years and HA have not been able to maintain some of their stock let alone increase the housing for some of the same qualifying populations as this funding is intended for. Further, our waiting lists are in the various thousands and people have to wait years in many cases for their names to come up. Typically, with other funding sources like LIHTC programs, this

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segment of the population is minimally served. In PBC, rents are out of reach to most families looking for affordable housing.

Will this program contemplate opportunities to increase public housing and/or affordable housing that can be provided by PHAs? Some of the sites have the ability to increase densities and this might be a good opportunity to serve the QP.

*Tammy McDonald, Palm Beach County Housing Authority*

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## **E. Post-Consultation Written Questions & Comments**

## Zach Summerlin

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**From:** Bill Aldinger  
**Sent:** Wednesday, October 27, 2021 12:49 PM  
**To:** Zach Summerlin  
**Cc:** Marisa Button  
**Subject:** FW: FHFC - \$70M in HOME ARP funds  
**Attachments:** Untitled Extract Pages.pdf

Just an FYI

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**From:** Angela Hatcher <ahatcher@blueskycommunities.com>  
**Sent:** Wednesday, October 27, 2021 10:17 AM  
**To:** Marisa Button <Marisa.Button@floridahousing.org>; Bill Aldinger <Bill.Aldinger@floridahousing.org>  
**Cc:** Shawn Wilson <swilson@blueskycommunities.com>; Geoffrey Harlan <gharlan@blueskycommunities.com>  
**Subject:** FHFC - \$70M in HOME ARP funds

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

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Hey Marisa and Bill,

Last Friday the HOME ARP allocation was included in the agenda package. While we realize it's early in the development stage of an allocation plan and the complete process for distribution, we wanted to ask 2 questions.

- (1) Will FHFC prioritize the funding to non PJ areas? Or allocate to non PJ housing agencies?
- (2) Are the funds to be used solely for Homeless Population? Or can they be used for Family/Elderly etc.



It was great seeing your faces last week.

**Angela Hatcher**  
**Senior Vice President – Development Programs**

**Office:** 813-384-4836  
**Cell:** 727-269-3853

  
**BLUE SKY**  
COMMUNITIES  
5300 W. Cypress Street, Suite 200  
Tampa, Florida 33607

[www.blueskycommunities.com](http://www.blueskycommunities.com)

## HOME-RENTAL

### *Action*

#### **B. Home Investment Partnerships Program (HOME) Funding from the American Rescue Plan Act (HOME-ARP)**

##### **1. Background**

- a) The American Rescue Plan (ARP) Act is a federal economic stimulus bill passed by the U.S. Congress and signed into law effective March 11, 2021. The legislation provides \$5 billion from the U.S. Department of Housing and Urban Development (HUD) to the Home Investment Partnerships Program (HOME). This funding is to provide housing and supportive services resources for households that are homeless or not stably housed. The HOME-ARP funding can be used for the following activities:
  - (1) Development and support of affordable housing, as currently permitted under the HOME program;
  - (2) Tenant-based rental assistance;
  - (3) Supportive services, including activities such as transitional housing, housing counseling, and homeless prevention services; and/or
  - (4) Acquisition and development of non-congregate shelter units, which may be converted to permanent affordable housing, used as emergency shelter, or remain as non-congregate shelter units.
- b) HOME-ARP program funds are available for participating jurisdictions to obligate for eligible activities through September 30, 2025. Funds may be drawn for expenditures through September 30, 2030.

##### **2. Present Situation**

- a) On April 8, 2021, HUD announced the HOME-ARP allocations for participating jurisdictions and that guidance for use of the funds would be released in Fall 2021. Florida Housing Finance Corporation was awarded \$71,903,340 as the recipient of the state's non-entitlement allocation.
- b) On September 13, 2021 HUD released CPD-21-10 Notice which provided guidance outlining the requirements for the use of funds in the HOME-ARP program. This guidance identified qualifying populations, instructions for completing the HOME-ARP Allocation Plan, eligible uses and activities under the HOME-ARP program, and other federal requirements. The CPD-21-10 Notice identifies the following as required components of a participating jurisdiction's HOME-ARP Allocation Plan:
  - (1) A summary of the consultation process and results of upfront consultation;
  - (2) A summary of comments received through the public participation process and a summary of any comments or recommendations not accepted and the reasons why;
  - (3) A description of HOME-ARP qualifying populations within the jurisdiction;

## HOME-RENTAL

### *Action*

- (4) An assessment of unmet needs of each qualifying population;
  - (5) An assessment of gaps in housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system;
  - (6) A summary of the planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations;
  - (7) An estimate of the number of housing units for qualifying populations the participating jurisdiction will produce or preserve with its HOME-ARP allocation; and
  - (8) A description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population.
- c) Florida Housing staff has reviewed the HOME-ARP program requirements described within the legislation and subsequent key guidance provided by HUD. The staff has determined the specific action items that are required by HUD to develop, request approval of, and implement a plan for the allocation of Florida Housing's HOME-ARP funds.. The next steps are to formally seek consultation and public participation in the development of the state's HOME-ARP Allocation Plan for submission to HUD for review and approval.

### 3. **Recommendation**

- a) Approve the staff's request to engage in the required consultation and public participation processes to develop a HOME-ARP Allocation Plan for submission to HUD.

## Zach Summerlin

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**From:** Turner, Colleen <Colleen.Turner@charlottecountyfl.gov>  
**Sent:** Thursday, December 2, 2021 4:20 PM  
**To:** Zach Summerlin  
**Cc:** Walsh, Carrie  
**Subject:** HOME ARP Public Comment - Charlotte County

Zach,

Thanks to you and Bill for your presentation this afternoon on the HOME ARP Allocation Plan. Here is my official public comment in writing, as advised during the webinar:

Charlotte County respectfully requests that the \$71.9 million in HOME ARP funds allocated to Florida Housing Finance Corporation for statewide distribution be **preserved or, at minimum, prioritized for non-entitlement communities that did not receive a direct allocation of HOME ARP funds.** Non-entitlement communities should not have to compete for funding with entities that received a direct allocation. Our opportunities for funding are limited enough as it is.

Thank you.



*Colleen K. Turner*

Senior Manager  
Charlotte County Human Services  
941-833-6502  
941-833.6565 fax

[www.charlottecountyfl.gov/departments/human-services/](http://www.charlottecountyfl.gov/departments/human-services/)

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**From:** [Barbara Beck](#)  
**To:** [Zach Summerlin](#)  
**Subject:** PUBLIC COMMENT ON HOME-ARP  
**Date:** Tuesday, December 14, 2021 1:23:54 PM

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Thank you for the opportunity to provide comments regarding the HOME-ARP funding for the State of Florida.

Habitat for Humanity of Florida, the largest-producing Habitat in the nation, is served by 53 affiliates covering the Panhandle to the Keys by providing affordable homeownership. The Habitat home buying program is well-known for eliminating dependence on other government subsidies by permanently solving the family's housing needs with an affordable mortgage.

Due to the unique community partnership and volunteer labor elements of our homeownership programs, we provide an average mortgage payment for a 3-bedroom/2-bath home for \$700/month, compared to the average rental rate for a similar size home of home \$1300/month.

Since virtually all other programs serve the rental providers, we propose that a portion of the funds be set aside for homeownership, serving homebuyers under 80% of AMI. Like many builders and housing providers, we see a 22% increase in costs to deliver housing due to Coronavirus's effect on the supply chain for building materials.

Habitat for Humanity affiliates currently use some HOME funds for both construction costs and down-payment assistance, so we are familiar with the usage of these funds.

*Barbara Beck*

Barbara Beck, President/CEO  
Habitat for Humanity of Florida  
1150 Cleveland Street #301  
Clearwater, FL 33755  
[ceo@habitatflorida.org](mailto:ceo@habitatflorida.org)  
727.475.1363 office  
727.742.9616 mobile





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December 14, 2021

Florida Housing Finance Corporation

VIA Email to:

[Bill.aldinger@floridahousing.org](mailto:Bill.aldinger@floridahousing.org)

[Zach.summerlin@floridahousing.org](mailto:Zach.summerlin@floridahousing.org)

**RE: HOME-ARP Public Comment**

**1. HOME Tenant Based Rental Assistance**

We recommend utilizing a portion of the State's HOME-ARP allocation for TBRA in order to continue the rental assistance of households who are receiving ESG-CV assistance and will not be able to stabilize before the ESG-CV time limitation of September 30, 2022. Those households need continued rental assistance, and some places do not have another source available. Statewide OUR Florida funding is not set to be utilized for this purpose and HOME TBRA could provide that opportunity for those households in need of continued housing stability. These households can be served under **Other Families Requiring Services or Housing Assistance to Prevent Homelessness**.

**2. Permanent Supportive Housing**

FHFC should utilize a significant portion of the State's HOME-ARP allocation to fund the development of permanent supportive housing. While several populations qualify under HOME-ARP, permanent supportive housing should be set aside for households experiencing homelessness and those with the highest needs. If too broad a population is included, the allocation may not target the groups who need it the most.

## **F. Public Hearing Listserv Announcement**

## Zach Summerlin

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**From:** Multifamily Programs <MULTIFAMILYPROGRAMS@LISTSERV.FLORIDAHOUSING.ORG>  
on behalf of Multifamily Allocations <Multifamily.Allocations@FLORIDAHOUSING.ORG>  
**Sent:** Friday, December 17, 2021 4:02 PM  
**To:** MULTIFAMILYPROGRAMS@LISTSERV.FLORIDAHOUSING.ORG  
**Subject:** Florida Housing posts HOME-ARP Allocation Plan Draft and begins the Public Comment Period



On December 2, 2021 Florida Housing Finance Corporation held a Consultation Workshop to seek input into the HOME American Rescue Plan (HOME-ARP) Allocation Plan Draft required by HUD. Florida Housing has posted a draft of the HOME-ARP Allocation Plan following consultation provided during this workshop and in the days following.

The following information has been posted to the HOME-ARP webpage

[https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-\(home\)-from-the-american-rescue-plan-act-\(home-arp\)](https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-(home)-from-the-american-rescue-plan-act-(home-arp))

- HOME-ARP Allocation Plan Draft for Public Comment
- HOME-ARP Allocation Plan Attachments
- Online Registration for Public Hearing
- Web Notice for Public Hearing

This posting of this Allocation Plan draft begins an opportunity for the public to provide comments and suggestions through January 4, 2022. Instructions for how to submit comments regarding the HOME-ARP Allocation Plan are available on the HOME-ARP webpage ([https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-\(home\)-from-the-american-rescue-plan-act-\(home-arp\)](https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-(home)-from-the-american-rescue-plan-act-(home-arp))) by clicking the Public Comments link at the bottom of the page.

Florida Housing will host a hearing of public comments on Thursday, January 6, 2022, beginning at 2:00 p.m. This hearing will be available by webinar. Registration for the webinar is required and is available on the webpage [https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-\(home\)-from-the-american-rescue-plan-act-\(home-arp\)](https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-(home)-from-the-american-rescue-plan-act-(home-arp)).

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## **G. Public Hearing Written Questions & Comments**

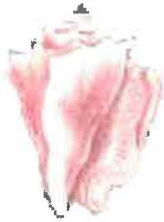
**From:** [Richard Bienapfl](#)  
**To:** [Zach Summerlin](#)  
**Subject:** ARP Program Comments  
**Date:** Monday, January 3, 2022 12:01:53 PM

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We see a need in various location within the state for low income housing with services for populations other than basedon age groups. There are assisted living like residential and service needs for veterans (any age) and the mentally impaired who have been homeless or simply are aging to the point they need a home and require additional assistance to live on a daily basis. Some of these persons are receiving some assistance from Medicaid, but are unable to personally arrange their services and in reality need a permanent home. We see an opportunity to convert existing underutilized (much due to covid) facilities to serve these populations. We would suggest this as a specific category of potential uses of these funds

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Teri Johnston  
Mayor



1300 White Street  
(305) 809-3840  
tjohnston@cityofkeywest-fl.gov

## THE CITY OF KEY WEST

P.O. BOX 1409  
KEY WEST, FL 33041-1409

January 6, 2022  
Florida Housing Finance Corporation  
227 N. Bronough Street #5000  
Tallahassee, FL 32301  
Attn: Zach Summerlin

Subject: Proposed use of HOME-ARP Funds

Dear Mr. Summerlin:

Monroe County is a small county in need of homeless housing development. In last year's Homeless RFA (2022-103), Monroe County was not allowed to apply. Therefore, we request that you consider allowing for the use of HOME-ARP alone OR with the use of Housing Credits and/or SAIL Financing in Monroe County.

One of the most challenging issues that Monroe County faces is the lack of affordable and workforce housing. This problem is due to the quadruple impact of high land values; land limited by geographic and environmental features; a tourism economy with a prevalence of lower paying, service-sector employment; and a limited housing supply. This lack of low-income affordable housing is broadening the gap for marginalized income households facing homelessness or households who have become homeless.

The chart below shows the results of the Point in Time (PIT) count performed by the Monroe County Homeless Continuum of Care (MC-CoC) for Monroe County from 2013 – 2018. Due to COVID-19, a PIT count by the MC-CoC wasn't conducted for years 2019 and 2020. However, a shelter count was conducted for the City of Key West.

Emergency Shelters	Transitional Housing	Unsheltered	Total
126	99	212	437

Non-profit agencies that provide emergency shelter, transitional housing, and supportive permanent housing programs are at capacity.

The City of Key West, along with two other housing providers (A.H. of Monroe County Inc. and Florida Keys Outreach Coalition) who currently own and operate transitional and permanent supportive housing in the city are working together to build a facility to address homeless individuals and households with

- Disabling Conditions
- Receiving SSI/SSD Benefits
- Mental Illness
- Youth transitioning out of foster care
- Survivors of domestic violence

This facility will represent a sustainable economic development and community revitalization project that provides access to resources for 195 individuals in need of a transitional housing program, including counseling for mental health and substance abuse, job training and community engagement. With this kind of continual support, the facility will provide 40 permanent housing units to transition individuals and families to a permanent housing unit and pathways to affordable housing. The City of Key West respectfully requests FHFC include in the HOME-ARP Allocation Plan financing for new construction of homeless housing.

Sincerely,

Teri Johnston  
Mayor of Key West





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January 7<sup>th</sup>, 2021

Florida Housing Finance Corporation

VIA Email to:

[Bill.aldinger@floridahousing.org](mailto:Bill.aldinger@floridahousing.org)

[Zach.summerlin@floridahousing.org](mailto:Zach.summerlin@floridahousing.org)

RE: HOME-ARP Allocation Plan Draft for Public Comment

**RECOMMENDATIONS:**

1. **Award TBRA funds to CoCs.** The funding dedicated to Tenant Based Rental Assistance should be awarded to Homeless Continuum of Cares to ensure these funds are used to assist clients who have received ESG-CV rental assistance and are not yet sustainable by the time ESG-CV funds end 9/30/22. CoC's manage the specific client data through HMIS on the households served through ESG-CV and would be the best entities to evaluate the need for continued financial assistance through HOME-ARP to ensure housing stability for these households.
2. **Dedicate \$500,000 to Supportive Services.** The Coalition suggests FHFC dedicate \$500,000 to the Supportive Services funding category to be used on the FHFC PSH Pilot Expansion. Specifically, these dollars should fund the Resident Coordinator positions on site. Managing Entities are required to be a partner in this pilot but may lack the resources to fully fund these positions. HOME-ARP Supportive Services can help offset that cost for Managing Entities and ensure each pilot site has the necessary support services to assist residents obtain and maintain housing stability.
3. **Create one new RFA solely for HOME-ARP.** The Coalition recommends FHFC create one new RFA to fund a limited number of projects that will be solely or primarily funded by HOME-ARP. Allowing projects to be solely funded by HOME-ARP outside of the regularly set RFA schedule may attract new applicants that may otherwise be discouraged by complex RFAs with multiple funding streams. Projects funded through this mechanism could be smaller developments that can be completed and online quickly for an immediate impact.
4. **Dedicate funding to Non-Profit Capacity Building and Non-Profit Operating.** The Coalition recommends dedicating funding to the Non-Profit Capacity Building and Operating categories as an incentive for non-profits within non-entitlement jurisdictions with limited capacity to apply and be successful in their applications and awarded projects.
5. **Require entitlement jurisdictions to provide a local contribution.** In previous comments from other statewide organizations, there has been discussion around how to create policies that differentiate proposals in entitlement and non-entitlement communities. The Coalition recommends FHFC require proposals from entitlement jurisdictions for HOME-ARP to secure local government funding or contribution. Requiring local funds for proposals in HOME-ARP entitlement jurisdictions could allow FHFC to fund more units statewide and incentivize developers in non-entitlement jurisdictions to apply as these developers would not be expected to secure a local contribution.



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## 6. Opportunity to serve underfunded communities.

The Coalition recommends FHFC target specific areas of the state based on homelessness data and previous funding awards. Identified areas are in desperate need of permanent housing stock and are often overlooked. Historically, FHFC funding as well as federal funds like ESG and ESG-CV have been awarded to entitlement communities and major metropolitan areas. The state allocation of \$71 million in HOME-ARP is an opportunity to provide funding to under-served and underfunded communities across the state for development, non-profit capacity building, and social services. Data points to consider when deciding what areas of the state should be included can include; (*See detailed attachment showing specific data point comparisons*)

- a. The number of homeless as a percentage of population
  - i. Based on this data, the following areas have the largest percentage of homeless compared to their general population; (highest to lowest)
    1. Monroe County (FL-604 CoC)
    2. Columbia, Hamilton, Lafayette and Suwannee Counties (FL-518 CoC)
    3. St. Petersburg, Clearwater, Largo/Pinellas County (FL-502 CoC)
- b. The number of unsheltered homeless as percentage of homeless population
  - i. Based on this data, the following areas have the largest percentage of unsheltered homeless populations compared to homeless population: (highest to lowest)
    1. Hendry, Hardee, Highlands, DeSoto, Okeechobee, Glades Counties (FL-517 CoC)
    2. Fort Pierce/St. Lucie, Indian River, Martin Counties (FL-509 CoC)
    3. Columbia, Hamilton, Lafayette, Suwannee Counties (FL-518 CoC)
- c. The number of chronically homeless as percentage of homeless population
  - i. Based on this data, the following areas have the highest percentages of chronic homelessness compared to homeless population: (highest to lowest)
    1. Fort Walton Beach/Okaloosa, Walton Counties (FL-505 CoC)
    2. Ft. Lauderdale/Broward County (FL-601 CoC)
    3. Pasco County (FL-519 CoC)



## ATTACHMENT 1: 2020 POINT IN TIME COUNT DATA REGARDING HOMELESSNESS

**Figure 1. The Number Homeless as a Percentage of Population**

Community/Continuum of Care Coverage Area	Total Homeless PIT 2020	Total General Population Census	Percent Population Homeless
FL-604 Monroe County CoC	421	82,874	0.51%
FL-518 Columbia, Hamilton, Lafayette, Suwannee Counties CoC	578	135,402	0.43%
FL-502 St. Petersburg, Clearwater, Largo/Pinellas County CoC	2,226	959,107	0.23%
FL-509 Fort Pierce/St. Lucie, Indian River, Martin Counties CoC	1,379	647,445	0.21%
FL-508 Gainesville/Alachua, Putnam Counties CoC	880	440,871	0.20%
FL-506 Tallahassee/Leon County CoC	805	444,487	0.18%
FL-606 Naples/Collier County CoC	603	375,752	0.16%
FL-517 Hendry, Hardee, Highlands Counties CoC	403	251,927	0.16%
FL-519 Pasco County CoC	898	561,891	0.16%
FL-513 Palm Bay, Melbourne/Brevard County CoC	940	606,612	0.15%
FL-511 Pensacola/Escambia, Santa Rosa Counties CoC	746	509,905	0.15%
FL-514 Ocala/Marion County CoC	523	375,908	0.14%
FL-504 Deltona, Daytona Beach/Volusia, Flagler Counties CoC	904	668,921	0.14%
FL-512 St. Johns County CoC	367	273,425	0.13%
FL-600 Miami-Dade County CoC	3,560	2,701,767	0.13%
FL-515 Panama City/Bay, Jackson Counties CoC	385	295,346	0.13%
FL-500 Sarasota, Bradenton/Manatee, Sarasota Counties CoC	1,044	833,716	0.13%
FL-505 Fort Walton Beach/Okaloosa, Walton Counties CoC	351	286,973	0.12%
FL-601 Ft Lauderdale/Broward County CoC	2,211	1,944,375	0.11%
FL-510 Jacksonville-Duval, Clay Counties CoC	1,366	1,304,164	0.10%
FL-605 West Palm Beach/Palm Beach County CoC	1,510	1,492,191	0.10%
FL-501 Tampa/Hillsborough County CoC	1,452	1,459,762	0.10%
FL-602 Charlotte County CoC	169	186,847	0.09%
FL-507 Orlando/Orange, Osceola, Seminole Counties CoC	2,007	2,289,420	0.09%
FL-503 Lakeland, Winterhaven/Polk County CoC	612	725,046	0.08%
FL-520 Citrus, Hernando, Lake, Sumter Counties CoC	703	862,066	0.08%
FL-603 Ft Myers, Cape Coral/Lee County CoC	444	760,822	0.06%
Total State of Florida	27,487		

**Figure 2. The Number Unsheltered Homeless as Percentage of Homeless Population**

Community/Continuum of Care Coverage Area	Total Homeless PIT 2020	Total Unsheltered Homeless	Percent Homeless Population unsheltered
FL-517 Hendry, Hardee, Highlands, DeSoto, Okeechobee, Glades Counties CoC	403	355	88%
FL-509 Fort Pierce/St. Lucie, Indian River, Martin Counties CoC	1,379	1,191	86%
FL-518 Columbia, Hamilton, Lafayette, Suwannee Counties CoC	578	494	85%
FL-519 Pasco County CoC	898	688	77%
FL-505 Fort Walton Beach/Okaloosa, Walton Counties CoC	351	255	73%
FL-508 Gainesville/Alachua, Putnam, Bradford, Gilchrist, Levy Counties CoC	880	601	68%
FL-605 West Palm Beach/Palm Beach County CoC	1,510	1,030	68%
FL-515 Panama City/Bay, Jackson, Holmes, Washington, Calhoun, Gulf Counties CoC	385	249	65%
FL-513 Palm Bay, Melbourne/Brevard County CoC	940	574	61%
FL-520 Citrus, Hernando, Lake, Sumter Counties CoC	703	424	60%
FL-512 St. Johns County CoC	367	205	56%
FL-511 Pensacola/Escambia, Santa Rosa Counties CoC	746	374	50%
FL-504 Deltona, Daytona Beach/Volusia, Flagler Counties CoC	904	453	50%
FL-603 Ft Myers, Cape Coral/Lee County CoC	444	211	48%
FL-602 Charlotte County CoC	169	76	45%
FL-601 Ft Lauderdale/Broward County CoC	2,211	984	45%
FL-604 Monroe County CoC	421	178	42%
FL-501 Tampa/Hillsborough County CoC	1,452	612	42%
FL-502 St. Petersburg, Clearwater, Largo/Pinellas County CoC	2,226	808	36%
FL-500 Sarasota, Bradenton/Manatee, Sarasota Counties CoC	1,044	363	35%
FL-510 Jacksonville-Duval, Clay, Nassau Counties CoC	1,366	451	33%
FL-503 Lakeland, Winterhaven/Polk County CoC	612	190	31%
FL-514 Ocala/Marion County CoC	523	150	29%
FL-600 Miami-Dade County CoC	3,560	1,020	29%
FL-606 Naples/Collier County CoC	603	168	28%
FL-507 Orlando/Orange, Osceola, Seminole Counties CoC	2,007	459	23%
FL-506 Tallahassee/Leon, Gadsden, Liberty, Franklin, Wakulla, Jefferson, Taylor, Madison County CoC	805	109	14%
Total State of Florida		12,672	

**Figure 3. The Number Chronically Homeless as Percentage of Homeless Population**

Community/Continuum of Care Coverage Area	Total Homeless PIT 2020	Total Chronic	Percent Chronic
FL-505 Fort Walton Beach/Okaloosa, Walton Counties CoC	351	183	52%
FL-601 Ft Lauderdale/Broward County CoC	2,211	654	30%
FL-519 Pasco County CoC	898	265	30%
FL-502 St. Petersburg, Clearwater, Largo/Pinellas County CoC	2,226	592	27%
FL-513 Palm Bay, Melbourne/Brevard County CoC	940	245	26%
FL-508 Gainesville/Alachua, Putnam Counties CoC	880	225	26%
FL-514 Ocala/Marion County CoC	523	130	25%
FL-511 Pensacola/Escambia, Santa Rosa Counties CoC	746	184	25%
FL-507 Orlando/Orange, Osceola, Seminole Counties CoC	2,007	489	24%
FL-517 Hendry, Hardee, Highlands Counties CoC	403	98	24%
FL-506 Tallahassee/Leon County CoC	805	192	24%
FL-603 Ft Myers, Cape Coral/Lee County CoC	444	93	21%
FL-501 Tampa/Hillsborough County CoC	1,452	266	18%
FL-500 Sarasota, Bradenton/Manatee, Sarasota Counties CoC	1,044	188	18%
FL-605 West Palm Beach/Palm Beach County CoC	1,510	241	16%
FL-600 Miami-Dade County CoC	3,560	524	15%
FL-602 Charlotte County CoC	169	23	14%
FL-606 Naples/Collier County CoC	603	80	13%
FL-503 Lakeland, Winterhaven/Polk County CoC	612	78	13%
FL-512 St. Johns County CoC	367	43	12%
FL-518 Columbia, Hamilton, Lafayette, Suwannee Counties CoC	578	65	11%
FL-515 Panama City/Bay, Jackson Counties CoC	385	43	11%
FL-504 Deltona, Daytona Beach/Volusia, Flagler Counties CoC	904	76	8%
FL-520 Citrus, Hernando, Lake, Sumter Counties CoC	703	58	8%
FL-604 Monroe County CoC	421	31	7%
FL-510 Jacksonville-Duval, Clay Counties CoC	1,366	71	5%
FL-509 Fort Pierce/St. Lucie, Indian River, Martin Counties CoC	1,379	45	3%
Total State of Florida	27,487	5,182	

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**Executive Director**  
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West Palm Beach, Florida 33407  
Office: (561) 684-2160 ext. 104  
Mobile: (561) 628-9387

**PBCHA**  
**PALM BEACH COUNTY HOUSING AUTHORITY**

January 7, 2022

Florida Housing Finance Corporation  
c/o Zach Summerlin  
227 North Bronough Street, Suite 5000  
Tallahassee, FL 32301

RE: HOME ARP Comments

Dear Zach,

Thank you for the opportunity to provide input on the HOME ARP amendment FHFC will submit to HUD. The Palm Beach County Housing Authority (PBCHA) serves 3443 residents of Palm Beach County by providing housing units, rental vouchers, project based-rental vouchers deployed through our landlord and developer partners as well as in our five public housing communities. In addition to the traditional roles of housing authorities, the PBCHA has processed 520 Emergency Housing Vouchers to assist Palm Beach County in serving its homeless residents. PBCHA also serves youth aging out of foster care with 24 FYI vouchers and can apply for more as needed.

Statistics suggest a bleak future for many of the 800-1000 teens who age-out of Florida's foster care system each year, 75-90 in Palm Beach County alone. The cost to society for the negative outcomes among this highly vulnerable population is incalculable.

Without intervention and support:

- Less than 50 percent of Florida's Foster Children Graduate from High School
- 30 percent are more likely to be Substance Abusers
- 50 percent are more likely to have a History of Domestic Violence
- Up to 85 percent of kids in foster care have Mental Health problems
- 25 percent Experience Homelessness within One Year
- 75 percent Experience Unemployment
- 40 percent Become Parents within 2 years
- 25 percent of Males and 10 percent of Females are Incarcerated within 18 months
- Only 1 in 6 are Completely Self-Supporting

PBCHA serves 85 veterans with the VASH voucher program. An overwhelming effort to provide emergency shelter and transitional housing for our veterans has been a focus in Palm Beach County. However, due to many challenges faced by this population which tends to require unique supportive services, permanent housing is in high demand and low supply.

The resources dedicated to helping homeless households are heavily weighted towards shelter housing and transitional housing. The transitional housing options aims to be a steppingstone between homelessness or shelter housing to independent housing stability. Once residents are ready to leave the supportive service environment the expectation is that with proper support, they can enter the regular rental housing market.



The reality is that residents exiting these programs still face huge hurdles in finding rental housing. Many formerly homeless individuals have criminal records, they have short or unstable work histories, and gaps in their housing history. They usually also have deficiencies in their credit reports. Most private landlords have lookback periods that are longer than the time these households have stability. A two-year stable housing, employment, criminal, and credit record does not meet the requirements of landlords that have 3-, 5-, and 7-year look-back periods on their background and other checks.

For a variety of reasons private landlords are unable to waive those requirements. In our experience, this causes a huge bottleneck in Palm Beach County. Residents who are ready to leave the transitional housing cannot find a rental unit they can qualify for, extending their residency in the transitional housing occupying a unit that otherwise would be available for a new client. The shelters then continue to be overcrowded and more funding is made available for transitional housing.

Affordable housing programs at both the statewide and local levels have largely focused on workforce housing serving people with incomes from 80%-140% of AMI. This population has options which are not available to families with incomes from 30% to 50% of AMI. Housing authorities serve this vulnerable extremely low-income group with waiting lists into the thousands. The families sometimes wait years for housing they can afford. For-profit developers do not generally provide housing opportunities for this population because it is difficult to successfully operate properties long term without subsidies to cover operating expenses and debt. PBCHA has not been able to increase public housing units or other opportunities for this segment of the population for over the last 39 years although the need is increasing every year.

We cannot stress how big of a need there is in our community and we suspect this situation is seen in many other areas around the state. We urge FHFC to consider making the HOME-ARP funding available to entities, such as public housing authorities, that naturally serve vulnerable populations and can commit to providing longer term housing solutions, specifically permanent housing options for families graduating from transitional housing with supportive services. Additionally, public housing authorities are best equipped to serve low and extremely low-income families. FHFC should also consider directing some HOME-ARP funds to public housing authorities targeted to this population.

This would allow Florida Housing to fill what we know is a gap in the current housing options for homeless, formerly homeless and those at risk of becoming homeless individuals and families.

Secondly, we acknowledge that certain Participating Jurisdictions have received HOME allocations directly under the ARP. FHFC should deploy its statewide funding primarily based on needs. We have reviewed the homelessness needs numbers FHFC is using, and we fear that the data for Palm Beach County may be inaccurate and may be downplaying the needs for housing for the homeless in Palm Beach County, particularly in relation to our county's population. The data FHFC is using is primarily based on a one-time county of people physically without a roof. It does not take into account the great need in Palm Beach County from households sleeping in motels, staying with families, or facing impending homelessness.

We believe that these suggestions meet the requirements for the use of the HOME-ARP funds and prioritize the goal of substantially reducing homelessness. Engaging the public housing authorities as partners ensures the long-term success of any units created and facilitates the quickest deployment of the funds.

Sincerely Yours,



Carol Jones-Gilbert  
Executive Director

## **H. Public Hearing Agenda (January 11, 2022)**

## **Florida Housing Finance Corporation**

### **Public Hearing to Discuss Florida's HOME-ARP Allocation Plan Agenda** **Registration for Workshop is required. Registration information is available at**

**([https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-\(home\)-from-the-american-rescue-plan-act-\(home-arp\)\)](https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-(home)-from-the-american-rescue-plan-act-(home-arp))))**

#### **Welcome**

Introductions

Purpose of Workshop

Florida Housing Finance Corporation is the state recipient for the federal HOME Investment Partnerships Program (HOME). This public hearing is to review written comments provided regarding the HOME-American Rescue Plan (HOME-ARP) Allocation Plan and solicit any new comments to be read into public record.

#### **Overview of HOME-ARP**

In March 2021 Congress passed and the President signed the American Rescue Plan Act (ARP), a federal economic stimulus bill, into law. The ARP provided \$5 billion in federal HOME funding, of which \$71.9 million dollars was allocated to the state of Florida. Florida Housing, as the administrator of HOME funding, will manage this special ARP funding.

In mid-September HUD released Notice CPD-21-10 which provided guidance outlining the requirements for the use of funds in the HOME-ARP program. This guidance identified qualifying populations, instructions for completing the HOME-ARP Allocation Plan, eligible uses and activities under the HOME-ARP program, and other federal requirements. HOME-ARP funding is intended to provide homelessness assistance and supportive services through four activities:

1. Development and support of affordable housing, as currently permitted under the HOME program;
2. Tenant-based rental assistance;
3. Supportive services, including activities such as transitional housing, housing counseling, and homeless prevention services; and/or
4. Acquisition and development of non-congregate shelter units, which may be converted to permanent affordable housing, used as emergency shelter, or remain as non-congregate shelter units.

Additionally, HUD identified “qualifying populations” to be served through HOME-ARP funding. Any individual or family who meets the criteria for these populations is eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria (e.g., additional income criteria). These “qualifying populations” include the following high level categories: 1) Homeless; 2) At risk of Homelessness; 3) Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking; and 4) Other Populations, including Other Families Requiring Services or Housing Assistance to Prevent Homelessness and Households at Greatest Risk of Housing Instability.

#### **Requirements of the HOME-ARP Allocation Plan**

The CPD-21-10 Notice identifies the following as required components of a participating jurisdiction's HOME-ARP Allocation Plan:

- A summary of the consultation process and results of upfront consultation;
- 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;
- An assessment of unmet needs of each qualifying population;
- An assessment of gaps in housing and shelter inventory, homeless assistance and services, and 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 estimate of the number of housing units for qualifying populations the participating jurisdiction 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.

### **Summary of Written Feedback Provided**

### **Additional Comments**

### **Next Steps**

Finalize HOME-ARP Allocation Plan (make recommendation to Board)	January 21, 2022
Submit Substantial Amendment to 2021 Annual Action Plan to HUD for Approval	January/February 2022

## **I. Public Hearing Verbal Questions & Comments**



**Comments received from the Public Hearing to Discuss Florida's HOME-ARP Allocation Plan**  
(held January 11, 2022)

1. We think we should reinforce the use of these units for people experiencing categories 1 and 4 of the homeless definition and that those persons are referred using the Coordinated Entry Process.

Relying on ESG dollars for Supportive Services is a mistake. By the time these funds come online, ESG-CV funds will have ended. Money needs to be set aside for supportive services.

We want to advocate to reduce barriers to have no minimum or maximum income requirements and no credit checks, reasonable criminal history checks, adjusted or no fees to apply when a referral is made by the CoC through the Coordinated Entry process.

We encourage the development of SRO's, efficiencies, 1-bedroom apartments with these funds.

We think you should couple National Housing Trust Fund dollars with HOME-ARP to further subsidize rents for extremely low-income people.

*Manuel Sarria, Miami-Dade County Homeless Trust*

2. Manny prioritized the five items that FCEH would like to support as well.

*Leeanne Sacino, Florida Coalition to End Homelessness*

## **J. Needs Assessment Summary Data Table**

Figure 1. Summary table detailing the estimate Supportive Housing (SH) and Affordable Housing (AH) unit need for all subpopulations examined at the time of this analysis.

Qualifying Population	Subpopulations Assessed	Estimated SH Unit Need (household)	Estimated AH Unit Need (household)	Unit Need Totals (SH+AH)
1. Homeless	Individuals experiencing chronic homelessness	4,664	518	5,182
	Individuals experiencing non-chronic homelessness	1,580	13,866	15,446
	Families experiencing homelessness*	296	913	1,209
Qualifying Population Subtotals		6,540	15,297	21,837
2. At-risk of homelessness	Families living doubled up or in hotels/motels	1,346	43,508	44,854
	Individuals exiting prison	319	1,278	1,597
	Youth aging out of foster care	625	1,875	2,500
	Individuals with SPMI and/or SUD in residential or inpatient treatment settings**	726	1,742	2,468
Qualifying Population Subtotals		3,016	48,403	51,419
3. Fleeing or Attempting to Flee DV	Survivors of Domestic Violence	80	1,520	1,600
Qualifying Population Subtotals		80	1,520	1,600
4. Other populations	Individuals with IDD requiring independent living services	995	1,990	2,985
	Child welfare involved families with an adult with special needs	2,180	***	2,180
	Individuals and families receiving SSI, SSDI, or veteran disability benefits	****	76,941	76,941
Qualifying Population Subtotals		3,175	78,931	82,106
Totals		12,811	144,151	156,962

Table Note: This table provides a summary of the overall estimated unit need for SH and AH for the subpopulations assessed in this analysis. Duplication across subpopulations has been accounted for in the methodology and removed wherever possible, but the potential for some duplication may continue to persist in the totals listed above. See Methodology section for more details. Numbers reflected in this report may be off +/- 1 due to rounding.

\*Chronically Homeless Families make up less than 10% of the chronically homeless population and a small percentage of families experiencing homelessness. As such, this category includes both non-chronic family households and those with a chronically homeless adult with a disability. HUD defines a Chronically Homeless family as a family with an adult head of household who meets the definition of a Chronically Homeless individual.

\*\*Assessment of need for individuals for whom no subsequent residence has been identified upon discharge.

\*\*\*This category assessed child-welfare involved families where one or more adults in the household who have a Special Need. A rate of 18% was applied to the total number of child-welfare involved families to estimate the share with Special Needs. This estimated number was allocated to a supportive housing intervention. Child welfare involved families without Special Needs may likely have affordable housing needs, but are expected to be captured in other assessment categories and were not assigned to an AH value here to minimize duplication.

\*\*\*\*In order to further prevent duplication, households in this group that would need supportive housing are assumed to be captured by other systems due to service needs and the high probability of duplication with other subpopulations in systems assessed for this report. This is not intended to indicate that there is never a need for a particular intervention for the specified subpopulation, or that overlap is 100%.

### Application for Federal Assistance SF-424

<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		<b>* If Revision, select appropriate letter(s):</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div> <b>* Other (Specify):</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>	
<b>* 3. Date Received:</b> <div style="border: 1px solid black; background-color: yellow; height: 15px; width: 100%;"></div>		<b>4. Applicant Identifier:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>5a. Federal Entity Identifier:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>			<b>5b. Federal Award Identifier:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>		
<b>State Use Only:</b>					
<b>6. Date Received by State:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>		<b>7. State Application Identifier:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>8. APPLICANT INFORMATION:</b>					
<b>* a. Legal Name:</b> <div style="border: 1px solid black; padding: 2px;">Florida Housing Finance Corporation</div>					
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <div style="border: 1px solid black; padding: 2px;">59-3451366</div>			<b>* c. Organizational DUNS:</b> <div style="border: 1px solid black; padding: 2px;">1789294360000</div>		
<b>d. Address:</b>					
<b>* Street1:</b>		<div style="border: 1px solid black; padding: 2px;">227 North Bronough Street</div>			
<b>Street2:</b>		<div style="border: 1px solid black; padding: 2px;">Suite 5000</div>			
<b>* City:</b>		<div style="border: 1px solid black; padding: 2px;">Tallahassee</div>			
<b>County/Parish:</b>		<div style="border: 1px solid black; padding: 2px;">Leon</div>			
<b>* State:</b>		<div style="border: 1px solid black; padding: 2px;">FL: Florida</div>			
<b>Province:</b>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>* Country:</b>		<div style="border: 1px solid black; padding: 2px;">USA: UNITED STATES</div>			
<b>* Zip / Postal Code:</b>		<div style="border: 1px solid black; padding: 2px;">32301-1329</div>			
<b>e. Organizational Unit:</b>					
<b>Department Name:</b> <div style="border: 1px solid black; padding: 2px;">HOME</div>			<b>Division Name:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>		
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>					
<b>Prefix:</b>		<div style="border: 1px solid black; padding: 2px;">Mrs.</div>			
<b>* First Name:</b>		<div style="border: 1px solid black; padding: 2px;">Nicole</div>			
<b>Middle Name:</b>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>* Last Name:</b>		<div style="border: 1px solid black; padding: 2px;">Gibson</div>			
<b>Suffix:</b>		<div style="border: 1px solid black; height: 15px; width: 100%;"></div>			
<b>Title:</b> <div style="border: 1px solid black; padding: 2px;">Federal Loan Programs Director</div>					
<b>Organizational Affiliation:</b> <div style="border: 1px solid black; height: 15px; width: 100%;"></div>					
<b>* Telephone Number:</b>		<div style="border: 1px solid black; padding: 2px;">850-488-4197</div>		<b>Fax Number:</b> <div style="border: 1px solid black; padding: 2px;">850-488-9809</div>	
<b>* Email:</b>		<div style="border: 1px solid black; padding: 2px;">Nicole.Gibson@floridahousing.org</div>			

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

United States Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14-239

CFDA Title:

HOME Investment Partnerships Program

### \* 12. Funding Opportunity Number:

861/50205

\* Title:

HOME - American Rescue Plan

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Low or no interest loans or grants to developers for construction or rehab of housing units for qualified populations and eligible persons. TBRA provided to PHAs.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

FL

\* b. Program/Project

HOME

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

04/01/2022

\* b. End Date:

09/30/2030

**18. Estimated Funding (\$):**

\* a. Federal

71,903,340.00

\* b. Applicant

\* c. State

\* d. Local

\* e. Other

\* f. Program Income

\* g. TOTAL

71,903,340.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☐ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

Mr.

\* First Name:

Harold

Middle Name:

\* Last Name:

Price

Suffix:

\* Title:

Executive Director

\* Telephone Number: 850-488-4197

Fax Number: 850-488-9809

\* Email: Trey.Price@floridahousing.org

\* Signature of Authorized Representative:

\* Date Signed:

3/21/2022

## HOME-ARP CERTIFICATIONS

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

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

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

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

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

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

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

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



Signature of Authorized Official

3/24/2022

Date

Executive Director

Title