

# HOME-ARP ALLOCATION PLAN

Produced By: Florida Housing Coalition



City of  
**Gainesville**

## WHAT'S INSIDE:

NEEDS ASSESSMENT  
GAPS ANALYSIS  
FUNDING PROPOSAL

## Table of Contents

Introduction.....	2
Consultation.....	3
Public Participation .....	10
Needs Assessment and Gaps Analysis.....	15
HOME-ARP Activities.....	27
Use of HOME-ARP Funding.....	29
HOME-ARP Production Goals.....	32
Preferences.....	34
Referral Methods.....	35
Limitations.....	36
HOME-ARP Refinancing Guidelines.....	38

# Introduction

## *Background*

On March 11, 2021, President Biden signed the American Rescue Plan (ARP) into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses. To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through the Department of Housing and Urban Development's (HUD) HOME Investment Partnerships Program (HOME) to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include: (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units.

ARP authorized HUD to allocate HOME-American Rescue Plan (HOME-ARP) funds to states, units of general local government, insular areas, and consortia of units of general local government that qualified for an allocation of HOME funds in Fiscal Year (FY) 2021, pursuant to section 217 of the Cranston-Gonzalez National Affordable Housing Act of 1990, as amended (42 U.S.C. 12701 et seq.) ("NAHA"). On April 8, 2021, HUD allocated HOME-ARP funds to 651 grantees using the HOME formula established at 24 CFR 92.50 and 92.60.

The City of Gainesville's HOME-ARP allocation is \$1,968,639. These funds must be used to reduce homelessness and increase housing stability for qualifying populations. Qualifying populations include:

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a));
- At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1));
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
- In other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability; and
- Veterans and families that include a veteran family member that meet one of the preceding criteria.

# Consultation

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

The City of Gainesville recognizes that consultation is important to support evidence-based solutions and intentional planning. The city was sure to comply with all regulatory guidelines governing HOME-ARP funds, including Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program* (the Notice). The city consulted a multitude of stakeholders including those required under the Notice, such as:

- The CoC serving the jurisdiction's geographic area,
- Homeless service providers,
- Domestic violence service providers,
- Veterans' groups,
- The public housing agency,
- Public agencies that address the needs of the qualifying populations, and
- Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

For all processes involving the administration of funds through the U.S. Department of Housing and Urban Development (HUD), the city follows consultation and public participation criteria outlined in its approved Citizen Participation Plan (CPP). The city's CPP encourages input from the community and public participation, emphasizing involvement by low and moderate-income persons of the Gainesville community, particularly those living in the targeted areas. The Plan also encourages comments and participation from all city residents, including minorities, non-English speaking persons, and individuals with disabilities. For the purposes of the HOME-ARP Allocation Plan, consultation and public participation focused on receiving input from qualifying populations, as defined above, and related service providers.

All stakeholders required to be consulted were invited to participate virtually via the FHC Connect platform which offers multiple ways to engage and provide input. Through this project specific site, stakeholders were provided the opportunity to complete a priority needs survey, a quick poll regarding gaps in the homeless services delivery system, exchange ideas related to HOME-ARP funding priorities, and ask questions about the city's HOME-ARP special allocation or its



administration of HUD programs. Although the survey was open to the public, many respondents were providers serving HOME-ARP qualifying populations. Input was solicited through this method from June 30, 2022 through August 31, 2022.

Stakeholders were also consulted directly via phone interviews where discussions involved soliciting input on the housing and service needs of the qualifying populations, identifying gaps in the housing inventory and homeless services delivery system, and revealing resources available for assisting qualifying populations. The consultation process involved the service organization and its clientele. Direct consultations took place during August 2022.

The city makes every effort to hear from neighbors and service providers when determining funding priorities and implemented a hybrid approach to consultation by conducting both on-site and virtual engagement. Consultation was ongoing June – September 2022.

In addition, stakeholders were consulted directly through interviews. Six organizations, representing the key agencies providing services to the city's qualifying populations, were consulted to provide feedback on priority needs of the service population. All providers were given the opportunity to share thoughts on unmet needs and propose solutions for addressing such within the bounds of HOME-ARP regulations. Providers were also asked to share thoughts regarding gaps in the housing inventory and service delivery system.

The Gainesville Housing and Community Development Department finds it equally important to ensure collaboration inter-departmentally. Staff representing several city departments were involved in regular planning meetings. Departments consulted included: 1) Communications Office; 2) Gainesville Fire Rescue; and 3) Sustainable Development, Planning Division. In addition, special councils were consulted included the Citizen's Advisory Committee for Community Development (CACCD), the City Commission General Policy Committee, and the Affordable Housing Advisory Committee (AHAC).

The data received from service providers, city departments, and special committees helped to inform the funding priorities identified in this plan.

*List the organizations consulted:*

Agency/Org. Consulted	Type of Agency/Org	Method of Consultation	Feedback
Created Gainesville	Sex Trafficking/Exploitation	Direct Interview	Lack of emergency non-congregate shelter and transitional housing beds, as well as case management resources and general affordable housing for those under 50% AMI.
United Way of North Central Florida/North Central Florida Alliance for the Homeless and Hungry	CoC Lead Agency/Collaborative Applicant	Direct Interview	Lack of capacity with homeless service providers, especially for rental assistance programs. Great need to expand permanent supportive housing.
GRACE Marketplace	Homeless Service Provider	FHC Connect Survey	Development of affordable rental housing is most needed, followed by non-profit operating and capacity building funds
Gainesville Housing Authority	Public Housing Authority	Direct Interview	Need for more affordable rental development, housing navigations and case management support

Alachua County Housing Authority	Public Housing Authority	Direct Interview and FHC Connect Survey	Need for more affordable rental development and landlord incentives to accept vouchers/TBRA as well as case management to sustain housing
Peaceful Paths Domestic Abuse Network	Domestic Violence Shelter	FHC Connect Survey	TBRA most needed, as well as development of affordable rental housing, paired with expansion of case management and housing location supportive services
Partnership for Strong Families, Inc.	Child Welfare Service Organization	Direct Interview	Need affordable housing developed for young adults ages 18-23 who have aged out of foster care and receive a housing stipend from the state of FL
Center for Independent Living of North Central Florida	Persons with Disabilities Service Organization	Direct Interview	Need for the development of more affordable housing units that are ADA compliant. Need for expanded support services to help people apply for benefits and locate housing.
ElderCare of Alachua County	Elderly Service Organization	Direct Interview and FHC Connect Survey	Need for non-profit operating to cover utilities of center, affordable housing for aging population not needing ALF or NH care yet. Development

			of affordable senior housing is needed, need for case management and benefits applications assistance
St. Francis House, Inc.	Homeless Services Families with Children	FHC Connect Survey	Top three priorities: Tenant-Based Rental Assistance (TBRA) Development of Affordable Rental Housing Supportive Services
Family Promise of Gainesville Florida, Inc.	Homeless Service Provider and Affordable Housing Developer	FHC Connect Survey	Top three priorities include: Development of Affordable Rental Housing Non-Profit Operating Funding (only 5% of total funding is eligible) Supportive Services
Art Studios of Grace, Grace Presbyterian Church, Gainesville	Community Building Organization	FHC Connect Survey	Top three priorities include: Development of Affordable Rental Housing Acquisition and Development of Non-Congregate Shelter Tenant-Based Rental Assistance (TBRA)
Alachua Habitat for Humanity	Affordable Housing Developer	FHC Connect Survey	Top three priorities include: Non-Profit Operating Funding (only 5% of total funding is eligible) Non-Profit Capacity Building (only 5% of total funding is eligible and only for organizations that serve homeless populations)

			Tenant-Based Rental Assistance (TBRA)
Three Rivers Legal Services, Inc.	Fair Housing Legal Services	FHC Connect Survey	Top three priorities include: Tenant-Based Rental Assistance (TBRA) Non-Profit Operating Funding (only 5% of total funding is eligible) Supportive Services
Girl Scouts of Gateway Council	Community Builder, Education and Children's Services	FHC Connect Survey	Top three priorities include: Supportive Services Development of Affordable Rental Housing Tenant-Based Rental Assistance (TBRA)
Gainesville Alumni Association	Neighborhood Organization, Education and Children's Services	FHC Connect Survey	Top three priorities include: Acquisition and Development of Non-Congregate Shelter Development of Affordable Rental Housing Tenant-Based Rental Assistance (TBRA)

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

Through participation in the *FHC Connect* Priority Needs Survey and direct consultation, providers serving qualifying populations provided following feedback:

- Lack of Permanent Supportive Housing and affordable housing, especially for single adults.
- Lack of provider capacity to offer rapid rehousing type programs which is an opportunity for capacity building and non-profit operations funding.

- Lack of emergency shelter options for those fleeing Human Trafficking in need of a short-term safe place immediately.
- Of 600 people served in a 12-month period through Human Trafficking providers, 75% of them need some sort of financial housing assistance.
- The Continuum of Care will have an increased responsibility with managing new HOME-ARP projects within their HMIS and Coordinated Entry, additional support is needed at the Continuum of Care level to support these functions.
- There should be an effort to coordinate Human Trafficking training to all Continuum of Care providers, this is an opportunity for capacity building among providers.
- Among the Domestic Violence and Human Trafficking providers, Tenant-Based Rental Assistance and Support Services were the most desired and effective interventions to support housing stability.
- Case Management and housing navigation services are needed to support the Domestic Violence and Human Trafficking populations.

Each provider interviewed indicated support for funding activities that will provide increased access to Permanent Supportive Housing, including the development of new affordable rental housing.



# Public Participation

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

In accordance with HUD regulations, the City of Gainesville made the following information available to the public during the development of the HOME-ARP Allocation Plan:

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

Below represents dates information was made available to the public:

- ***Date(s) of public notice:*** The city published multiple public notices to solicit input on its HOME-ARP special allocation and to notify the public and stakeholders of plan availability for public comment and the public hearing date.
  - ***Community Engagement Public Notices:*** The 6<sup>th</sup>, 13<sup>th</sup>, 20<sup>th</sup>, 21<sup>st</sup>, 27<sup>th</sup>, and 28<sup>th</sup> of July 2022.
  - ***Comment Period Public Notice:*** November 18, 2022
- ***Public comment period:*** November 18 – December 8, 2022
- ***Date(s) of public hearing:*** December 6, 2022

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

The City of Gainesville is diligent about carrying out public participation activities in accordance with its HUD approved Citizen Participation Plan. Throughout the development of the HOME-ARP Allocation Plan, the City of Gainesville complied with all applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for underserved and marginalized populations, including individuals with disabilities and limited English proficient (LEP) residents. To support inclusion and provide meaningful access to participation, all print materials and digital platforms used to solicit input were formatted for accessibility and city staff were available to receive and comply with any requests for accommodation.

The city implemented a robust public participation process intended to solicit meaningful input to inform the use of its HOME-ARP dollars. The city makes every effort to hear from neighbors and service providers when determining funding priorities and implemented a hybrid approach to community participation by conducting both on-site and virtual engagement. To ensure the planning process was inclusive, all print materials and digital platforms used to solicit input were formatted for accessibility and city staff was available to receive and comply with any requests for accommodation.

Additionally, during the months of June-August 2022, city staff presented on HOME-ARP at several meetings to solicit input from stakeholders. On-site engagement events included:

HOME-ARP On-Site Public Participation		
1	AHAC Meeting	July 12, 2022
2	General Policy Committee Meeting	July 14, 2022
3	CACCD Workshop / Public Meeting	July 19, 2022
4	Community Meeting	July 27, 2022
5	Community Meeting	August 3, 2022

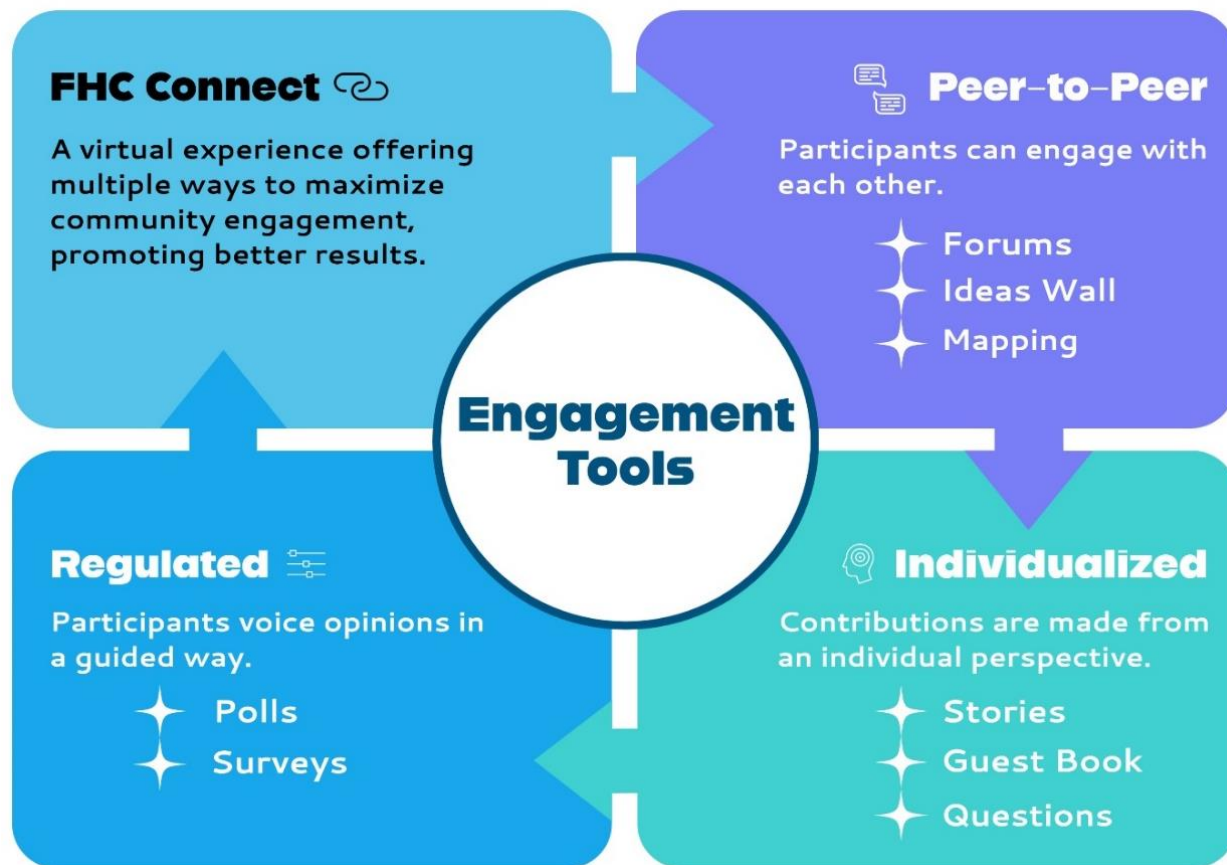
Virtual community engagement methods were also used to gather input from the public and stakeholders on unmet needs of qualifying populations and to discuss effective uses of HOME-ARP funds. The city started by hosting a virtual CACCD workshop/public meeting on June 28, 2022, followed by direct consultations with service providers and the launch of a virtual engagement platform offering multiple tools for gathering input.

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

Traditional methods of outreach often unintentionally exclude underserved populations, particularly the qualifying populations of focus under the HOME-ARP program. The city recognized this and committed to making changes to its planning process with the intentions of eliminating barriers to participation. While the city complied with federal citizen participation regulations, a key effort made to broaden participation was launching the *FHC Connect* virtual experience in addition to holding meetings at a physical location.

*FHC Connect* utilizes current technology to meet the increasing demand for a virtual presence. Outreach has changed, particularly since the pandemic, and *FHC Connect* is a progressive outreach method for maximizing citizen participation. This unique virtual experience is an all-in-one community engagement platform offering a set of comprehensive tools and widgets to collect stakeholder input and data. The platform allowed residents and stakeholders to engage in a variety of ways through a webpage dedicated to the city's HOME-ARP program. In addition, the platform complies with Web Content Accessibility Guidelines (WCAG), offers convenience, and the ability to engage at a comfortable pace. These features often increase participation by marginalized populations.

Available features of *FHC Connect* include:



The city also broadened public participation efforts by facilitating community engagement forums to discuss affordable housing. Forums took place on May 9, 2022; June 1<sup>st</sup>, 4<sup>th</sup>, and 25<sup>th</sup> 2022 and September 24, 2022.

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

The *FHC Connect* virtual platform garnered a large portion of the feedback received through public participation efforts. Overall, *FHC Connect* resulted in 262 visits of which 192 were aware (visited at least one page), 85 were informed (viewed, downloaded, visited, or contributed), and 26 engaged (contributed, participated, or posted).

There were 60 visitors and 22 contributors to the priority needs survey, primarily providers serving qualifying populations. When asked to rank in order of importance housing activities most needed to decrease homelessness, creation of new affordable rental housing ranked in the top two.

Below summarizes additional feedback received from the priority needs survey:

- Lack of funding for increased services.
- Lack of units to provide shelter.
- Lack of awareness about services.
- Non-profit capacity building, acquisition and development of non-congregate shelter, and development of affordable rental housing were ranked among the top needs to effectively decrease homelessness.
- Job readiness, housing counseling, life skills training, and homeless prevention services were ranked among the top supportive services needed to decrease homelessness.
- Scattered sites, hotel/motel rooms, and conversion of existing congregate shelters were ranked as the top ways to develop and provide non-congregate shelter.
- Rehabilitation of existing units, creation of new affordable rental housing, and permanent supportive housing were ranked as the rental housing activities most needed to decrease homelessness.
- For the long-term, creating new affordable housing is critical. Until that exists, we need stopgap funding for agencies provided housing-related crisis services. COVID has had an outsized impact on staff, reserve funds, capacity, and ability to grow.
- While not as visible, homelessness prevention and improving the quality of the current affordable housing should be priorities.
- There is a need for dedicated counselors who maintain, establish, and cultivate relationships with rental property owners and managers to ensure access to housing, who work to also ensure those entities follow city ordinance and applicable law.
- Where people are able to go to sleep at night affects their ability to handle any other aspects of their lives. HUD and municipalities should prioritize the construction and logistics needed to get everyone to safe, decent housing every night.
- Free busing program, subsidized daycare (including night option) for working mothers, food distribution points away from downtown.
- There should be buy-in from those individuals receiving assistance in the form of required payment plan or volunteer hours.

- Consider community gardens, housing for artists at risk of homelessness.
- Socioeconomic and racial inequality are commonplace in both local neighborhoods and schools. Funds should be used to revitalize East Gainesville affordable living to spur economic development which will create a sense of involvement for the community.

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

All comments and recommendations were accepted during the public participation process and incorporated into the HOME-ARP Allocation Plan as appropriate. See attached for comments received and responded to during the public comment period on the draft allocation plan.

# Needs Assessment and Gaps Analysis

Homelessness is a particularly troublesome and complex issue that plagues communities across the nation. Often, persons experiencing homelessness face multiple and overlapping challenges, which presents real challenges to local jurisdictions, social service providers, and Continuums of Care (CoC) working to address homelessness. This reality is no different in the City of Gainesville. Beyond persistent challenges in addressing the varied needs of individuals, the region faces an increasingly expensive housing market. The economic realities of the housing market at the time this plan was written imposes constant pressure on the supply of housing, particularly for those most vulnerable to homelessness and qualifying populations.

A primary approach to addressing homelessness is to take proper inventory of the scale of the issue. This is done through data analysis, outreach, and consultation with stakeholders to assess the individual needs of qualifying populations. By doing so, not only does the city have a better understanding of needs for the homeless, but service and housing providers will also have greater insight into the particular needs of the homeless and other qualifying populations.

In order to accurately represent the needs of Gainesville's qualifying populations, the city conducted a needs assessment and gap analysis utilizing both quantitative and qualitative data. From resources including the Point-in-Time Count, Housing Inventory Count, and HUD Five-Year Consolidated Plan, the city was able to determine the number of sheltered and unsheltered individuals experiencing homelessness on a single night and every other year. Also, the Housing Inventory Count provides an inventory of existing provider programs within the Continuum of Care that provide beds and units dedicated to serve people experiencing homelessness. From the Five-Year Consolidated Plan, the city was able to gather data on the current inventory of rental units affordable to households at risk of homelessness (at or below 30% of AMI) and the number of rental units affordable to households at 50% AMI.

Ultimately, the needs assessment and gaps analysis revealed that for the homeless population, there is currently a surplus of beds for family households with at least one child and there is a lack of beds for adult households without children. Additionally, data told us that out of a total of 29,455 rental units in the city, only 1,545 rental units are affordable to households at risk of homelessness.

The analysis also revealed several gaps in the homeless delivery system that are detailed in this section but include: 1) access to available, affordable units; 2) access to services; 3) education and awareness; 4) sufficient standardized policies; 5) agency coordination; 6) landlord participation; and 7) data accuracy.

See the full needs assessment and gaps analysis detailed below.



**Homeless Needs Inventory and Gap Analysis - Table 1**

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	152	N/A	148	N/A	26								
Transitional Housing	29	13	0	N/A	74								
Permanent Supportive Housing	0	N/A	104	N/A	904								
Other Permanent Housing	0	N/A	0	N/A	0								
Sheltered Homeless						83	248	81	59				
Unsheltered Homeless						39	546	54	57				
<b>Current Gap</b>										+142	N/A	-294	N/A

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

**Housing Needs Inventory and Gap Analysis - Table 2**

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	29,455		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,545		
Rental Units Affordable to HH at 50% AMI (Other Populations)	5,460		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		6,665	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,875	
<b>Current Gaps</b>			- 2,535

**Data Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS); 3. City of Gainesville 2018-2022 Consolidated Plan

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

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

*General Homelessness:*

According to the 2022 Point In Time (PIT) Count completed by the Continuum of Care on January 25<sup>th</sup>, 2022, a total of 925 individuals experienced homelessness on this specific night with 63% (587 individuals) being unsheltered. This is the highest PIT count in the past 5 years. The majority (65%) of the homeless population identifies with being male. Less than 5% identified as Hispanic/Latino in ethnicity, where 52% identified as white and 42% identified as being black in regard to race. Just over 5% identified with multiple races. Twenty-four percent (223 people) of the individuals were experiencing chronic homelessness, meaning they have a disability and have been homeless for at least 12 months over the past three years. One-hundred and seventy individuals, of which 142 were unsheltered also disclosed they are living with a serious mental illness. Upon looking to the CoC System Performance Measure Data submitted to HUD for 2021, 1,198 individuals were served in the 12-month reporting period either through an emergency shelter or transitional housing. First-time homelessness was reported among 1,039 individuals going through the homeless and housing crisis response system in 2021.

*Single Adults*

Majority of the homeless population within the Gainesville area are single adults without children. As of the 2022 PIT count data, there were 794 individual adults identified as homeless, 31 of them being young adults between the ages of 18-24 while the other 763 were over 24 years of age. The gender makeup included 30% female, 69% male, and less than 1% (4 people) identifying as Gender Non-conforming. A total of 4% identified as Hispanic/Latino. The racial breakdown of this population included 55% white, 39% black, and 5% identifying with multiple races. Chronic homelessness was the highest among single adults, with 209 individuals meeting the criteria for chronicity.

*Family Homelessness*

Families consisting of at least one adult over the age of 18 and one child under 18 accounted for 33 households on the PIT night. The average family size for those experiencing homelessness among this group is 3.6 individuals. There were 76 children under the age of 18 in these households, 7 people between the ages of 18-24, and 39 people over the age of 24. A total of 61% of individuals in these households were female, while the remaining 39% were male. Ten individuals, 8%, identified as Hispanic/Latino regarding ethnicity. The racial breakdown of these households shows that 61% identify as Black/African American, 31% identify as White, and 7% identified with multiple races. There were 3

households totaling 13 people who met the criteria for being considered chronically homeless.

### Youth Homelessness

According to the 2022 PIT data, there were 49 youth under the age of 18 living on their own, 24 of who were living in unsheltered situations. The majority, 78% identified as male. No one in this category identified as Hispanic/Latino and there was an equal representation of those identifying as White and those identifying as Black, with 50% represented for each race. One youth identified as being chronically homeless

### Veteran Homelessness

There was a total of 135 homeless veterans with 39 in emergency shelter, 42 in transitional housing, and 54 unsheltered. There were no families with children where the head of household identified as a veteran. Less than 1% of veterans identified as Hispanic/Latino in ethnicity and 64% identified as white, and 33% identified as black in race. Twenty-four veterans were considered chronically homeless.

#### ▪ ***Risk of Homelessness as defined in 24 CFR 91.5***

As of the 2021 Emergency Rental Assistance Program Treasury Demographic Report, a total of 3,230 households were assisted in Alachua County. All of these households were and may continue to be at risk of homelessness due to inadequate income and the cost of housing. An average of \$3,003 was spent to prevent homelessness per household by either covering costs related to rental assistance or arrears, and utilities assistance or arrears. With 1,039 individuals reporting their first episode of homelessness in 2021, (HUD CoC System Performance Measures), it is presumed their first experience with homelessness could have been avoided through expanded resources for homelessness prevention. This group of 1,039 individuals experiencing first time homelessness is also a good indicator of the individuals falling into homelessness for which homelessness could have been prevented. The Department of Education data on doubled-up families; meaning the count of families that are forced to live together in inadequately sized housing to accommodate their families due to a lack of financial resources, indicated 635 Alachua County School children counted for doubled-up living situations.

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

The 2022 PIT data revealed that 116 people were survivors of domestic violence, with 57 of those individuals being unsheltered on the night of the PIT count. Also, through consultation with the major victim services providers, Created Gainesville, they served over 600 individuals over the past 12 months through their assistance with sexual

exploitation services, all of which needed some type of housing assistance, whether it be relocation assistance, financial assistance, or legal assistance.

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

Access to data is limited for “other populations” as defined by the HUD Notice, however the city used the most recent available data to describe the characteristics of other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability.

○ *Other Families Requiring Services/Housing Assistance to Prevent Homelessness -*

In accordance with the HUD Notice, this population is defined as households (i.e., individuals and families) who have previously been qualified as “homeless”, 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.

According to the city’s most recent Consolidated Plan, there are 5,460 rental units affordable to households at 50% AMI and 2,875 renter households at 30%-50% AMI with one or more severe housing problems. This indicates a lack of affordable rental housing and hazardous living conditions. Data is limited, but there is a correlation that suggests low-income individuals and families lacking a suitable living environment may have experienced homelessness at one point. These households are vulnerable to housing instability and could return to homelessness without assistance.

Table 1 above, Homeless Needs Inventory and Gap Analysis, also indicates the city has 471 sheltered homeless through emergency shelters, transitional housing, or permanent supportive housing. Those individuals and families currently housed in emergency shelters or through transitional housing are vulnerable to returning to homelessness without additional housing assistance or supportive services.

○ *At Greatest Risk of Housing Instability -*

In accordance with the HUD Notice, this population is defined as: 1) households having annual income that is less than or equal to 30% of the area median income and experiencing severe cost burden; or 2) having annual income that is less than or equal to 50% of the area median income and meets at least one condition of the definition of “At Risk of Homelessness”, including living in housing that has characteristics associated with instability and an increased risk of homelessness or

living 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 persons reside per room.

According to the city's most recent Consolidated Plan, there are 8,324 cost burdened households and 7,660 severely cost-burdened at 30% AMI, putting these households at risk of housing instability. There are 1,545 rental units affordable to households at 30% AMI (At-Risk of Homelessness). Renters have a greater rate of cost burden than owners.

In addition, data from the Consolidated Plan indicates that 12,855 (27%) of all households in Gainesville experienced at least one of the four severe housing problems. For the income category 0-30% AMI, 6,665 rental households (65%) of the 10,250 households within that income cohort have a severe housing problem. For the income category 30-50% AMI, 2,875 rental households (60%) of the 4,775 households within that income cohort have a housing problem. A total of 565 households are overcrowded in the City of Gainesville. Overcrowding affects households at all income levels however extremely low-income (0-30% AMI) and low-income (30-50% AMI) households experience overcrowding at a higher rate than other income categories.

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

#### Shelter

Upon the most recent homeless housing inventory completed by the CoC in January 2022, a total of 326 emergency shelter beds were available to the community, with 23 of those beds being in non-congregate shelter settings, the other 303 beds were all congregate in setting. According to the 2022 PIT count, 282 of the 326 year-round beds were utilized showing a shelter utilization rate of 87%. The lower utilization rate for emergency shelters can be explained by covid and needing to make accommodations for social distancing in congregate shelter settings to some extent. This community also has an additional 108 seasonal beds and another 1,128 overflow beds designated to compensate for extreme weather and high shelter need times.

#### Supportive Services

Throughout the direct consultations with local organizations serving those nearing or experiencing homelessness, victim service providers, and PHAs, there was a general consensus that supportive services for housing location and case management to sustain housing are not provided to the extent needed. Specifically mentioned among a few providers were supportive services, specifically, for care navigation and intensive case management services for permanent supportive

housing programs. Providers shared that there needed to be more resources dedicated to supportive services for serving all of the qualified populations. Specifically mentioned multiple times was the difficulty in locating affordable housing suitable for the qualifying populations due to conditions imposed on the rental market directly related to the pandemic and there is little to no resources to fund supportive service helping the qualifying populations with navigation of service systems and housing location assistance.

### *Tenant-Based Rental Assistance*

Renters are struggling to find affordable rental units and cost-burdened renters are one unexpected expense away from homelessness. Existing rental assistance programs, such as the Section 8 Housing Choice Voucher Program, public housing, and programs available to homeless persons through the CoC and its partners, are overextended with either long or closed waiting lists. Gainesville Housing Authority (GHA) administers over 1,580 vouchers. The need for rental assistance far exceeds GHA's capacity as there are 15,229 low-income (0-80% AMI) cost-burdened renters (7,124 extremely low-income, 4,255 low income, and 3,850 moderate-income). Cost-burdened renters include 3,140 small related and large related households.

The special needs population includes the elderly, persons with disabilities, persons with substance use disorders, and public housing residents. The growing number of persons with special needs require affordable housing since some of them are unable to work or have lower earning potential. To enable special needs persons to live independently they may also require accessible housing and/or permanent supportive housing. There are 1,024 elderly low-income renter households that are cost-burdened and 4,020 low-income renter households with a disabled member have a housing problem and require housing assistance. The market characteristics for general TBRA described above also substantiate the need for this type of program.

### *Permanent Supportive Housing*

The results of the 2022 HIC showed that there are 1,008 slots for Permanent Supportive Housing. Of those, the majority, 904, are dedicated to being used for veterans only, leaving only 104 slots for the general chronically homeless population who are not veterans. Again, upon the most recent PIT count night, there were at least 223 individuals on that night experiencing chronic homelessness and needing permanent supportive housing. This illustrates, at a minimum, a gap of 120 additional PSH slots. Permanent Supportive Housing "slots" does not guarantee there are appropriate affordable rental units for these participants to choose from in the community. As indicated in the Housing Needs Inventory and Gap Analysis Table above, there are already limited units available for 30% or below AMI-earning households. These PSH slots are competing for these same, limited units. Expanding the number of affordable units for those earning 30% AMI and below would improve efficiency among the existing PSH programs, allowing participants to find appropriate permanent rental housing more quickly and providing options suiting an array of needs associated with ADA compliance.



## Affordable Housing

Detailed in the above Housing Needs Inventory and Gap Analysis Table, units for those earning 30% AMI and below are the greatest need and have the fewest availability with only 1,545 units currently dedicated to this group and an additional need of 5,120 units dedicated to this income range. According to the same table, the number of units dedicated to those households earning between 30-50% AMI should be sufficient when compared to need, it is really the ELI population needing additional affordable housing units.

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

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

The primary unmet needs among those meeting the homeless definition established in 24 CFR 91.5 include: 1) lack of access to affordable, decent housing for people below 30% AMI; 2) lack of resources supporting long term rental subsidies for those below 30% AMI; and 3) lack of resources supporting case management assisting with navigating and sustaining permanent housing options, including support staff and assessment staff for the Coordinated Entry System.

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

The primary unmet needs among those at risk of homelessness include: 1) lack of resources for financial assistance covering rental and utility arrears; 2) landlord-tenant mediation and legal services; and 3) vouchers and TBRA programs providing long-term rental subsidies.

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

The primary unmet needs for those fleeing DV and sexual exploitation situations include: 1) financial assistance to help with relocation, rent and utility payments and Deposits; 2) resources for case management services; and 3) resources for emergency shelter beds either through single-site or scattered-site hotels.

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

Cost burden is the primary issue to housing stability for “other populations” and the unmet needs include: 1) lack of affordable housing; and 2) access to support services to promote housing stability. In addition, seniors (62+) and those with disabilities, who the city has included in the definition of “other populations”, typically have limited, fixed incomes not high enough to accommodate their needs associated with living independently and aging in place. The primary unmet needs for these populations include: 1) funding for rehab of

existing housing to make it more accessible; 2) funding for case management; and 3) support staff providing some in-home support and health care services.

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

Homelessness is a multi-faceted and challenging issue at the individual-, family-, and community-level. In its current incarnation, the housing inventory and service delivery system in the City of Gainesville for persons experiencing homelessness and qualifying populations is primarily centered on emergency shelter and short-term assistance.

Beyond emergency shelter, the institutional service delivery system includes rent and utility assistance to persons experiencing homelessness, as well as a broad range of supportive services available to address alcohol and substance abuse disorders, child-care needs, education and workforce training needs, healthcare at a free or reduced cost, and mental health counseling. There are also food banks operating in the service delivery system that provide free meals to persons experiencing homelessness.

Although the delivery system in the city features significant investment and service options, the Continuum of Care outlined a set of goals in the 2020 Action Plan to address gaps in the shelter and housing inventory and service delivery system. Goals are intended to address the following gaps:

Access to available, affordable units:

The demand for housing far outweighs the supply of available housing units, in particular permanently affordable units. Wait list for public housing units, Housing Choice Vouchers, and permanent supportive housing are lengthy, exacerbating homelessness and continuing to put vulnerable populations at-risk. With dignity village coming to a close, the need for additional units will be even greater to re-house individuals.

Access to services:

For qualifying populations access to transportation to and from services is a major barrier. There are not enough resources to expand mobile clinic operations and not enough organizational and staff capacity to operate such clinics if mobile services were to increase. Without transportation many homeless or at-risk individuals are unable to be provided shelter or benefit from supportive services.

In addition, lack of funding has prevented the expansion of services through organizational capacity building. There is a need for additional providers citywide to address the demand for services. Under the current delivery system, any loss of providers could also result in loss of beds and/o loss of additional funding sources.

#### Education and awareness:

Findings from past community-based planning efforts revealed that many individuals are unaware of housing or service programs available to assist them. It has been indicated that more outreach and education is necessary not only for qualifying populations to understand what options are available but also to enhance public awareness of homelessness.

#### Sufficient standardized policies:

Though the CoC operates and complies with local, state, and federal funding requirements members identified the need to develop and implement CoC-wide standards to enhance service delivery and ensure care is provided through coordinated systems.

#### Agency coordination:

Non-profit organizations serving qualifying populations operate on limited budgets and are not guaranteed permanent funding, therefore it is necessary to ensure funds are directed appropriately to effectively decrease homelessness. Coordination amongst funders will identify common priority needs leading to more impactful solutions being funded.

#### Landlord participation:

Lack of landlord participation is increasingly becoming a significant barrier to affordable housing, particularly for qualifying populations. Creating a better relationship with landlords and helping to reassure them of the benefits of participation is critical to maintaining affordable housing. Providing incentives will assist in overcoming contributing factors related to the loss of landlord participation.

#### Data accuracy:

Often, the needs of vulnerable populations remain unmet due to inaccurate, outdated, and unavailable data. To address homelessness, the extent of it must be measured and accurately represented. Creating a coordinated system for data collection from service providers would help to better identify and raise awareness about the priority needs of qualifying populations.

***Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:***

To further refine the definition of “other populations” the city has opted to include the elderly, 62+ in accordance with HUD’s definition, and individuals with disabilities. Through direct consultation with ElderCare of Alachua County and Disability service organizations, it was

revealed that those with disabilities or those needing to age in place with limited financial and social resources, living independently is not an option. There are not many units that are ADA compliant and affordable for someone on a fixed income reliant on SSI or SSDI alone. At times, people needing in-home healthcare either fall into homelessness, end up with family or friends, or are advanced to an even higher level of care, like an assisted living or nursing home facility due to the lack of independent, affordable and accessible housing and lack of supports to keep people in their homes, aging in place. According to the city's most recent Consolidated Plan, of the low- and moderate-income disabled households in Gainesville, 5,985 (70%) have one or more of the four housing problems defined by HUD.

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

Priority needs, in order of importance for all qualifying populations combined are: 1) the need for the development of accessible and affordable rental housing for persons with extremely low income, specifically bedroom units for adult couples and single adults; 2) financial assistance to help attain and sustain affordable rental housing; and 3) support services funding for housing location and system navigation as well as case management.

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

To accurately determine the level of need and the gaps in the shelter and housing inventory and service delivery systems a comprehensive analysis was necessary to include a review of data presented in the plan as well as consideration of information presented through other relevant resources. Level of need and gaps were determined through:

**Needs Assessment and Gaps Analysis**

The city utilized the Homeless Needs Inventory and Gap Analysis table and the Housing Needs Inventory and Gap Analysis table to better understand and determine what the homeless profile looks like in Gainesville, including the number of sheltered and unsheltered homeless and whether there was a need for beds. Findings identified a surplus of family beds and a lack of beds for single adults. Data also revealed a large availability of beds targeted for veterans, specifically permanent supportive housing beds. The non-homeless housing inventory table helped the city determine a gap in affordable rental housing, primarily for the extremely-low- income category, which are most at-risk for homelessness.

In addition, the plan describes the size and demographics composition of qualifying populations in the City of Gainesville, which is imperative to know when determining priority needs as this information helps inform projects, funding amounts, and whether preferences are necessary.

### Priority Needs Survey

Surveying stakeholders is a primary tool used to determine level of need and gaps. From survey results, the city was able to analyze specific data points including which eligible activities are thought to effectively decrease homelessness and benefit qualifying populations. The survey also ranked priority needs, which in turn were incorporated into the plan and analyzed to determine strategies for the use of HOME-ARP funds.

### Direct Consultation

Consultation with stakeholders, specifically providers serving qualifying populations, enabled the city to analyze data from a different perspective. Through this lens, priority needs that would otherwise be overlooked, were brought to the attention of the city impacting how the level of need and gaps were identified. Consultations resulted in several needs being identified that were not revealed through the Needs and Gap Analysis or survey.

### Review of Current Programs and Activities

Determining need and gaps goes beyond qualitative and quantitative data analysis. It is also necessary to review what programs currently exist in the community to address the needs of qualifying populations and what activities are currently being funded. From looking at this information, the city was able to determine: 1) if there were unmet needs remaining and where those gaps existed; 2) if there are sub-categories of qualifying populations that have higher needs; 3) what eligible activities will have maximum impact in addressing unmet needs; 4) how much funding is needed to address unmet needs; and 5) how to effectively leverage resources.

### Local, State, and Federal Resources

Based on the data and information gathered and incorporated into this plan, development of affordable rental housing was determined to be a high need. Though the city has received this special allocation of HOME-ARP dollars, leveraging of resources may be necessary to carry out projects of this size. The city completed a review of available local, state, and federal resources to determine if development of rental housing was an option that could become a successful strategy in addressing the needs of qualifying populations.

### Organizational Capacity

A review of organizational capacity helped the city determine gaps in the service delivery system. Many organizations serving qualifying populations stated that they have experienced staffing issues, have a lack of funding to administer increased programs and services, and one revealed that it may be stepping down from its role in rapid re-housing activities. This information was considered when determining level of need and gaps.

# HOME-ARP Activities

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

For the purposes of its HOME-ARP activities, in cases where the city must solicit services from developers, service providers, or contractors, local, state, and federal procurement guidelines will be followed, specifically in accordance with 24 CFR Part 85. All purchases or solicitations for services will be handled fairly and in a manner that encourages full and open competition. Depending on the type of service being procured and the dollar amount involved, the city will use either: 1) small purchase procedures; 2) sealed bids; 3) or competitive proposals.

When soliciting applications for funding the city issues a Notice of Funding Availability (NOFA) and implements the following process:

1. The city releases the NOFA, which identifies the amount of available funding, eligible activities, location, and deadline for applicants to submit proposals.
2. The city hosts an online applicant workshop to provide guidelines and answer questions related to the NOFA.
3. Housing and Community Development (HCD) staff score and vet applications/proposals and determine funding recommendations based on established selection criteria.

If the city determines the use of a sub-recipient is necessary to carry out any of its HOME-ARP programs or activities, at its discretion, the city may designate a qualified and responsible entity to this role or solicit proposals from multiple organizations. The city will utilize an inter-agency agreement or sub-recipient agreement, as applicable, to ensure activities are carried out in accordance with federal regulations.

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

The city's Housing and Community Development Department intends to remain the lead agency responsible for the administration of its HOME-ARP allocation and related eligible activities. The city is proposing to develop affordable rental units and may designate a sub-recipient or solicit proposals from qualified applicants to provide property management or master-leasing services. Sub-recipients will be obligated to comply with all federal regulations pertaining to the HOME and HOME-ARP programs but ultimately the HCD Department will be directly responsible for



oversight, monitoring, and reporting as well as other applicable program administration requirements.

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

The city will not pre-award any portion of its HOME-ARP administrative funds to a sub-recipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

# Use of HOME-ARP Funding

Funding Allocation Plan			
	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 1,673,343.15		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 295,295.85	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,968,639</b>		

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

The city’s determination for use of funds is directly informed by the priority needs identified from the gap analysis and community engagement efforts. The needs assessment and gaps analysis revealed several patterns of unmet needs for qualifying populations in the City of Gainesville, in

particular the need for additional beds for individual adults and additional affordable rental units targeted towards households at or below 30% AMI.

The majority of the homeless population within the Gainesville area are single adults without children. As of the 2022 PIT count, there were 794 individual adults identified as homeless, 31 of them being young adults between the ages of 18-24 while the other 763 were over 24 years of age.

In addition, qualitative data from consultation and public participation indicated a strong need for access to affordable rental units. Nearly 100% of participants and service providers engaged in consultation listed development of affordable rental housing as one of three top priority needs.

As a result of this analysis, the city will utilize 85% of its total HOME-ARP allocation towards the development of affordable rental housing. This solutions-based approach is intended to increase affordability for vulnerable and at-risk populations seeking safe, decent housing and diversifying the housing stock addresses the need for smaller rental units that can serve homeless adult individuals and households at or below 30% AMI, amongst other qualifying populations.

The remaining 15% of funds will be utilized for grant administration.

***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:***

To determine activities that will have the greatest benefit to qualifying populations in the City of Gainesville, it is imperative to consider the existing housing profile. Current shelter resources show 326 emergency shelter beds available, of which only 23 are located in non-congregate shelter settings. The shelter utilization rate is 87%, with the lower rate being attributed to accommodating social distancing throughout the COVID-19 pandemic. The city also has the capacity to expand beds by nearly 72% through additional seasonal and overflow beds. Based on these characteristics, there is not an identifiable need for shelter expansion.

Further, analysis of gaps in the housing inventory and service delivery system stated access to affordable units, access to services, and landlord participation as major barriers for Gainesville's qualifying and vulnerable populations. Lengthy wait lists for public housing units and vouchers exacerbates homelessness and continues to put vulnerable populations at-risk. Additionally, limited access to transportation and lack of landlord participation means decreased access to services or permanent affordable housing options.

The data mentioned above, along with feedback received during the consultation process provided the rationale to fund the development of affordable rental housing. The city's strategy is to develop rental units and pair that activity with features such as master-leasing and mentor programs to help with access to services and landlord participation. In addition to meeting the immediate housing needs of its qualifying populations by increasing access to affordable units, the city's approach to

development of rental housing offers several other benefits including: 1) supports long-term affordability and permanent housing; 2) addresses the need for smaller rental units (1- 2 bedroom) to house individuals; 3) supports inclusion with scattered site housing; 4) diversifies the housing stock; 5) supports equitable development; and 6) promotes consistency with comprehensive plan and consolidated plan goals.

# HOME-ARP

## Production Goals

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

The city has \$1,673,343.15 available to carry out small scale development of affordable rental housing and is proposing to develop approximately fifteen (15) rental units through redevelopment of existing lots and new construction of scattered site Accessory Dwelling Units (ADU's). The intention is to utilize all units to house individuals meeting one or multiple qualifying populations as defined in the Notice, however no more than 30% of the total units assisted with HOME-ARP funding will be occupied by low-income households not meeting a qualifying population.

The proposed production goal is an estimate based on current costs of construction and is subject to change with the market. The city will closely monitor fluctuations in pricing and may have to adjust production goals accordingly.

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

The city intends to decrease homelessness and provide housing stability for qualifying populations through the development of decent, safe, and sanitary rental housing. The city's strategy is to increase access to housing units for its most vulnerable populations through redevelopment of existing city-owned lots along with new construction of ADU's.

The city's redevelopment strategy will mitigate slum and blighted conditions, restore the existing affordable housing stock, increase access to affordable units, and decrease the number of individuals experiencing homelessness throughout the city. The approach includes redeveloping existing structures formerly used as relocation homes by HCD rehabilitation clients. Funds will be leveraged for the demolition of these homes, which have previously been determined to be unsuitable for rehabilitation, and each lot will be reconstructed using HOME-ARP dollars. To maximize the number of affordable rental units created, the city will consider several housing options including single-family, duplex, townhome, condominiums, and ADU's intended to house qualifying populations.

Incorporating ADU's into the rental development activity is an affordable housing solution that is gaining traction across the nation and provides multiple benefits for low-income and vulnerable populations as well as homeowners themselves. Creating affordable units through the construction of ADU's is also a goal in the city's Comprehensive Plan, meaning that land use regulations have already been modified to allow for this type of housing. The city has recently seen a rise in interested residents wanting to construct ADU's and has issued nearly 40 permits since its

inception. This strategy is a great way to champion affordable housing efforts while addressing the unmet needs of qualifying populations.

The ADU component involves construction on the existing lots being redeveloped or allows for participation by local homeowners willing to construct a unit on their property. To incentivize homeowners to participate, the city will underwrite either a portion of construction costs or fully fund the project. The city will partner with local qualified and experienced architects to design three (3) ADU floorplans which will be available to homeowners to choose their preference.

The city will coordinate with the Planning Division and internal legal team to identify and determine the best model for administering the ADU component and to develop policies, terms, and criteria for the program. Period of affordability agreed to by the homeowner may be a factor in determining assistance amounts, however all units will maintain a period of affordability no less than 15 years. Homeowner participants will be subject to terms and conditions to maintain compliance with local, state, and federal requirements, including lien placement on the home. The city will use its current HOME recapture guidelines for the ADU program, reviewing and revising as necessary to comply with HOME-ARP regulations.

In addition, the city will pair its rental strategy with master-leasing. Qualifying populations are often discriminated against for not having reliable income, for having a housing voucher, or for having previous evictions on their records. Implementing a master leasing strategy can eliminate discrimination barriers and significantly increase access to affordable housing for qualifying populations.

The city's rental development goals address the priority needs identified in this plan by:

- Increasing affordable permanent supportive housing options for qualifying populations.
- Creating units to address the need for smaller (1–2-bedroom) units.
- Providing the potential to pair qualifying populations with mentors/sponsors for better access to services.
- Increasing landlord participation in affordable housing programs.
- Promoting inclusive/integrated housing options as units will be scattered site.
- Diversifying the city's housing stock supporting fair housing choice.
- Supporting equitable development throughout the city.
- Providing stability to both the property owner and the tenant through master leasing.

# Preferences

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

The city will not give preference to one or more qualifying populations or a subpopulation due to the high demand for access to affordable housing for all vulnerable residents. Not giving preference allows the city to address the immediate needs of individuals meeting a qualifying population as the need arises. All qualifying populations eligible applicants will be placed on a waitlist in chronological order.

***If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Not applicable.



# Referral Methods

The City of Gainesville will utilize a **waitlist** to provide rental housing to qualifying populations with its HOME-ARP allocation. The waitlist will be open to **all** qualifying populations as defined in the HUD Notice. The City of Gainesville has a significant number of non-profit community partners who provide daily services to the municipality's non-housed neighbors in best efforts to reduce and prevent homelessness. These agencies have many years of experience not only identifying homeless related issues but in providing real-world solutions utilizing available resources.

The City of Gainesville proposes to utilize the experience and expertise of all (each) of these homeless providers to compile a waitlist of qualifying populations eligible applicants to benefit from the rental housing services described in the plan. Community partner referral resources will have the ability and option to indirectly refer eligible applicants from any qualifying population to be placed on the waitlist. The city will not rely on any one community partner for specific qualifying populations referrals to be placed on the waitlist.

The waitlist will be set under a **first come, first serve criteria** - driven by the receipt date of the referral. As such, no preferences will be established or considered for the waitlist and there will be no prioritization between qualified populations eligible applicants on the waitlist. The city currently uses this type of waitlist process in its housing rehabilitation program via the use of the Neighborly software system. This system automatically assigns a Case ID to an initiated application and indicates the date when the application is submitted. Once submitted, no changes are permitted to the application. This submission DATE and not the CASE ID is what drives the hierarchy of the waitlist.

Non-profit community partners, providing homeless services will submit their indirect referrals into the system, which will be used by HCD to provide rental housing services to all qualifying populations. This utilization of the list (in submission date order), qualifies as INDIRECT referrals, thereby negating any perceived preference for services. The indirect referrals process only determines applicants eligible to participate in the HOME-ARP activity for placement on the waitlist. Under no circumstance, will HCD accept agency referrals to allow direct access to rental units for the qualifying populations.

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

The city will use a waitlist to receive indirect referrals from its community partners (including the CoC). Partner agencies will refer applicants for the waitlist based on eligibility. In accordance with the HUD Notice and the waitlist process described above, qualifying populations eligible

applicants indirectly referred, will be placed on the waitlist for the HOME-ARP activity in chronological order. No preference or priority will be given amongst qualifying populations eligible applicants on the waitlist. In maintaining a waitlist, the city will ensure compliance with federal HOME and HOME-ARP regulations as well as the Fair Housing Act. Indirect referral policies and procedures will be developed in a manner to provide equal opportunity to **all** qualifying populations.

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

The city will not rely on the coordinated entry (CE) process to directly place eligible applicants into a unit or to provide assistance. The city's process involves accepting **indirect** referrals from multiple sources (including the CoC) to be placed on the waitlist. The indirect referral process only establishes qualifying populations eligible applicants to be placed on the waitlist.

***If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):***

Not applicable.

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

The city will not rely on the CE process for placing eligible applicants onto a waitlist or into units. Community partner referral resources may only identify eligible applicants to be indirectly referred, therefore there will be no preference or prioritization between referral methods.

# Limitations

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

The city does not intend to limit eligibility for its HOME-ARP rental housing strategy to a particular qualifying population or specific subpopulation of a qualifying population.

***If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Not applicable.

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

Not applicable.

# HOME-ARP Refinancing Guidelines

*If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b).*

The city does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

*The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:*

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

Note applicable.

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

Not applicable.

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

Not applicable.

# SF-424, SF-424B, SF-424D Certifications

## Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

12/06/2022

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

M-21-MP-12-0206

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

City of Gainesville

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

59-6000325

**\* c. UEI:**

MNEFBYCXMR8

**d. Address:**

**\* Street1:**

P.O. Box 490

**Street2:**

**\* City:**

Gainesville

**County/Parish:**

**\* State:**

FL: Florida

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

32602-0490

**e. Organizational Unit:**

**Department Name:**

Neighborhood Improvement

**Division Name:**

Housing&Community Development

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Mr.

**\* First Name:**

Corey

**Middle Name:**

**\* Last Name:**

Harris

**Suffix:**

**Title:**

Senior Housing Strategist

**Organizational Affiliation:**

**\* Telephone Number:**

352-393-8314

**Fax Number:**

**\* Email:**

harriscj@cityofgainesville.org

## Application for Federal Assistance SF-424

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

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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

U.S. Department of Housing and Urban Development

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

14.239

CFDA Title:

HOME Investment Partnership American Rescue Plan (HOME-ARP)

### \* 12. Funding Opportunity Number:

M-21-MP-12-0206

\* Title:

HOME Investment Partnership American Rescue Plan (HOME-ARP)

### 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:

Affordable rental housing development to reduce homelessness and provide housing stability for qualifying populations.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments



**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

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

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,968,639.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="1,968,639.00"/>

**\* 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 18, Section 1001)**

☒ \*\* I AGREE

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

**Authorized Representative:**

Prefix:  \* First Name:


Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: 

\* Signature of Authorized Representative:

  
Cynthia Curry (Dec 6, 2022 12:27 EST)

\* Date Signed:

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

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


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

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL  Cynthia Curry (Dec 6, 2022 12:27 EST)	TITLE Interim City Manager
APPLICANT ORGANIZATION City of Gainesville	DATE SUBMITTED Dec 6, 2022

## ASSURANCES - NON-CONSTRUCTION PROGRAMS

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


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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
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17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL  Cynthia Curry (Dec 6, 2022 12:27 EST)	TITLE Interim City Manager
APPLICANT ORGANIZATION City of Gainesville	DATE SUBMITTED Dec 6, 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.

  
Cynthia Curry (Dec 6, 2022 12:27 EST)

Signature of Authorized Official

Dec 6, 2022

Date

Interim City Manager

Title

# HOME ARP Grant Agreement

Title II of the Cranston-Gonzalez National Affordable Housing Act

Assistance Listings #14.239 – HOME Investment Partnerships Program

1. Grantee Name and Address Gainesville  Po Box 490 Gainesville, FL 32602-0490	2. Grant Number (Federal Award Identification Number (FAIN)) M21-MP120206	
	3a. Tax Identification Number 596000325	3b. Unique Entity Identifier (formerly DUNS) 010522159
	4. Appropriation Number 861/50205	5. Budget Period Start and End Date FY 2021 – 09/30/2030

6. Previous Obligation (Enter "0" for initial FY allocation)	\$0
a. Formula Funds	\$

7. Current Transaction (+ or -)	\$1,968,639.00
a. Administrative and Planning Funds Available on Federal Award Date	\$98,431.95
b. Balance of Administrative and Planning Funds	\$196,863.90
c. Balance of Formula Funds	\$1,673,343.15

8. Revised Obligation	\$
a. Formula Funds	\$

9. Special Conditions (check applicable box) <input type="checkbox"/> Not applicable <input type="checkbox"/> Attached	10. Federal Award Date (HUD Official's Signature Date) 09/20/2021
---	--

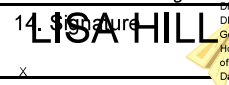

11. Indirect Cost Rate*	12. Period of Performance Date in Box #10 – 09/30/2030															
<table border="1"> <thead> <tr> <th>Administering Agency/Dept.</th> <th>Indirect Cost Rate</th> <th>Direct Cost Base</th> </tr> </thead> <tbody> <tr><td>—</td><td>—%</td><td></td></tr> <tr><td>—</td><td>—%</td><td></td></tr> <tr><td>—</td><td>—%</td><td></td></tr> <tr><td>—</td><td>—%</td><td></td></tr> </tbody> </table>	Administering Agency/Dept.	Indirect Cost Rate	Direct Cost Base	—	—%		—	—%		—	—%		—	—%		<p>* If funding assistance will be used for payment of indirect costs pursuant to 2 CFR 200, Subpart E-Cost Principles, provide the name of the department/agency, its indirect cost rate (including if the de minimis rate is charged per 2 § CFR 200.414), and the direct cost base to which the rate will be applied. Do not include cost rates for subrecipients.</p>
Administering Agency/Dept.	Indirect Cost Rate	Direct Cost Base														
—	—%															
—	—%															
—	—%															
—	—%															

The HOME-ARP Grant Agreement (the "Agreement") between the Department of Housing and Urban Development (HUD) and the Grantee is made pursuant to the authority of the HOME Investment Partnerships Act (42 U.S.C. 12701 et seq.) and Section 3205 of the American Rescue Plan (P.L. 117-2) (ARP). HUD regulations at 24 CFR part 92 (as may be amended from time to time), the CPD Notice entitled "Requirements for the Use of Funds in the HOME-American Rescue Plan Program" (HOME-ARP Implementation Notice), the Grantee's HOME-ARP allocation plan (as of the date of HUD's approval), and this HOME-ARP Grant Agreement, form HUD-40093a, including any special conditions (in accordance with 2 CFR 200.208), constitute part of this Agreement. HUD's payment of funds under this Agreement is subject to the Grantee's compliance with HUD's electronic funds transfer and information reporting procedures issued pursuant to 24 CFR 92.502 and the HOME-ARP Implementation Notice. To the extent authorized by HUD regulations at 24 CFR part 92, HUD may, by its execution of an amendment, deobligate funds previously awarded to the Grantee without the Grantee's execution of the amendment or other consent. The Grantee agrees that funds invested in HOME-ARP activities under the HOME-ARP Implementation Notice are repayable in accordance with the requirements of the HOME-ARP Implementation Notice. The Grantee agrees to assume all of the responsibility for environmental review, decision making, and actions, as specified and required in regulation at 24 CFR 92.352 and 24 CFR Part 58, as well as the HOME-ARP Implementation Notice.

The Grantee must comply with the applicable requirements at 2 CFR part 200, as amended, that are incorporated by the program regulations and the HOME-ARP Implementation Notice, as may be amended from time to time. Where any previous or future amendments to 2 CFR part 200 replace or renumber sections of part 200 that are cited specifically in the program regulations or HOME-ARP Implementation Notice, activities carried out under the grant after the effective date of the 2 CFR part 200 amendments will be governed by the 2 CFR part 200 requirements, as replaced or renumbered by the part 200 amendments.

The Grantee shall comply with requirements established by the Office of Management and Budget (OMB) concerning the Universal Numbering System and System for Award Management (SAM) requirements in Appendix I to 2 CFR part 200, and the Federal Funding Accountability and Transparency Act (FFATA) in Appendix A to 2 CFR part 170.

Funds remaining in the grantee's Treasury account after the end of the budget period will be cancelled and thereafter not available for obligation or expenditure for any purpose. Per 31 U.S.C. 1552, the Grantee shall not incur any obligations to be paid with such assistance after the end of the Budget Period.

13. For the U.S. Department of HUD (Name and Title of Authorized Official) Lisa A. Hill, CPD Director	14. Signature  x	15. Date 09/20/2021
16. For the Grantee (Name and Title of Authorized Official) Cynthia W. Curry, Interim City Manager	17. Signature  Cynthia W. Curry (Jan 6, 2022 14:43 EST)	18. Date Jan 6, 2022

19. Check one: ☒ Initial Agreement ☐ Amendment #

20. Funding Information:

Source of Funds	Appropriation Code	PAS Code	Amount
HOME ARP	861/50205	HMX	\$1,968,639.00

Approved as to Form & Legality

  
Scan McDermott (Jan 6, 2022 14:06 EST)

Asst City Attorney

21. Additional Requirements: These additional requirements are attached and incorporated into this Agreement. The Grantee agrees to these additional requirements on the use of the funds in 7., as may be amended from time to time by the Secretary.

- a) As of the Federal Award Date, the Grantee may use up to the amount identified in 7.a. of this Agreement for eligible administrative and planning costs in accordance with the HOME-ARP Implementation Notice.
- b) Until the date of HUD's acceptance of the Grantee's HOME-ARP allocation plan, the Grantee agrees that it will not obligate or expend any funds for non-administrative and planning costs, in accordance with the HOME-ARP Implementation Notice.
- c) In accordance with the HOME-ARP Implementation Notice, as of the date of acceptance by HUD of the Grantee's HOME-ARP allocation plan, HUD shall make the amount identified in line 7. of this Agreement available to the Grantee.
- d) If the Grantee does not submit a HOME-ARP allocation plan or if the Grantee's HOME-ARP allocation plan is not accepted within a reasonable period of time, as determined by HUD, the Grantee agrees that all costs incurred and HOME-ARP funds expended by the Grantee will be ineligible costs and will be repaid with non-Federal funds.

## 22. Special Conditions

# Public Notices Advertising

# LOCALiQ

The Gainesville Sun | The Ledger  
Daily Commercial | Ocala StarBanner  
News Chief | Herald-Tribune

PO Box 631244 Cincinnati, OH 45263-1244

## **PROOF OF PUBLICATION**

John Wachtel  
Comm Dev Housing-309  
Po Box 490  
Station #22  
Gainesville FL 32627-0490

STATE OF FLORIDA, COUNTY OF ALACHUA

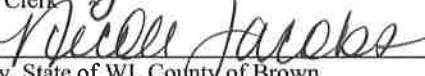
Before the undersigned authority personally appeared said legal clerk, who on oath says that he or she is of the legal clerk of the Gainesville Sun, a newspaper published at Gainesville in Alachua County, Florida; that the attached copy of advertisement, being a in the matter of in the Court, was published in said newspaper in the issues dated or by publication on the newspaper's website, if authorized, on:

11/18/2022

and that the fees charged are legal. Affiant further says that the Gainesville Sun is a newspaper published at Gainesville, in Alachua County, Florida, and that the said newspaper has heretofore been continuously published in said County, Florida, each and has been entered as periodicals matter at the post office in Gainesville, in Alachua County, Florida, for a period of 1 year next preceding the first publication of the attached copy of advertisement; and affiant further says that he or she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Sworn to and subscribed before on 11/18/2022

  
\_\_\_\_\_  
Legal Clerk

  
\_\_\_\_\_  
Notary, State of WI, County of Brown

  
\_\_\_\_\_  
My commission expires

Publication Cost: \$491.18

Order No: 8056637

# of Copies:

Customer No: 536659

1

PO #: Cost Est-HOM ARP

**THIS IS NOT AN INVOICE!**

*Please do not use this form for payment remittance.*

NICOLE JACOBS  
Notary Public  
State of Wisconsin

# City of Gainesville

## **NOTICE OF PUBLIC HEARING**

### **AND COMMENT PERIOD**

#### **HOME-American Rescue Plan**

#### **(HOME-ARP)**

#### **Draft Allocation Plan**

On March 11, 2021, President Biden signed the American Rescue Plan (ARP) into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses. To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through the U.S. Department of Housing and Urban Development (HUD) HOME Investment Partnerships Program (HOME) to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include: (1) development and support of affordable housing, (2) Tenant-Based Rental Assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units.

**The City of Gainesville (City) has received \$1,968,639 of HOME-ARP funds.** These funds must be used to reduce homelessness and increase housing stability for qualifying populations. Qualifying populations include:

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a));
- At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1));
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
- Other populations where providing supportive services or assistance under Section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent a family's homelessness or would serve those with the greatest risk of housing instability; and
- Veterans and families that include a veteran family member that meet one of the preceding criteria.

As a recipient of these federal funds through HUD, the City is required to submit an Allocation Plan. The Plan provides a needs assessment and gaps analysis of Gainesville's homeless and other vulnerable populations and describes how the City will use HOME-ARP funds to reduce homelessness and provide housing stability for qualifying populations. Comments on the draft HOME-ARP Allocation Plan will be accepted from November 18, 2022 through December 8, 2022.

A virtual Public Hearing to receive citizen comments on the Draft HOME-ARP Allocation Plan will be held during a special Citizens Advisory Committee for Community Development meeting on Tuesday, December 6, 2022, from 5:30 p.m. – 6:30 p.m., with access available as follows: Join Zoom Meeting

<https://us06web.zoom.us/j/87510457001?pwd=cjNjcnhGZhdldVXVnS0lGeXJ2QT09>

Dial by your location +1 305 224 1968 US

Meeting ID: 875 1045 7001 Passcode: 018330

Find your local number: <https://us06web.zoom.us/j/87510457001>

The Draft Plan is available for review online at: <https://www.gainesvillefl.gov/Government-Pages/Government/Departments/Housing-Community-Development>. Electronic or hard copies of the Draft Plan can be requested by email at [coghousing@gainesvillefl.gov](mailto:coghousing@gainesvillefl.gov). Please submit written comments to: Citizen Comment, c/o City of Gainesville Housing & Community Development Division, P.O. Box 490, Station 22, 32627-0490 or to [coghousing@gainesvillefl.gov](mailto:coghousing@gainesvillefl.gov).

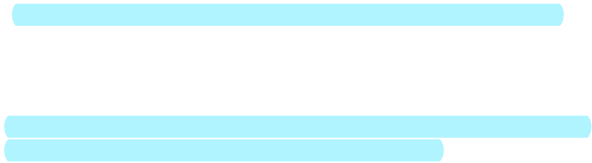
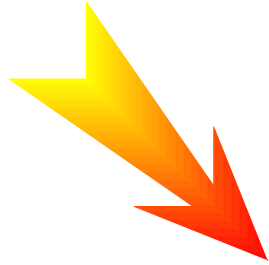
*The City of Gainesville is an Affirmative Action/Equal Opportunity/Drug Free Workplace Employer. The City of Gainesville is committed to a policy of non-discrimination in all City programs, services and activities, and will provide reasonable accommodations upon request. To request accommodations for non-English speaking persons, individuals with disabilities, and individuals with hearing impairments, please contact the City of Gainesville Office of Equity and Inclusion at (352) 334-5051 (voice) or (352) 334-2069 TDD; TTY users please call 711.*

**FAIR HOUSING/EQUAL OPPORTUNITY/DISABILITY  
ACCESS JURISDICTIONS**





Ad Number:	37905394	Advertiser:	Housing & Community Development o...
Insertion Number:	N/A	Agency:	N/A
Size:	2 Col x 10.25 in	Section-Page-Zone(s):	A-3-All
Color Type:	N/A	Description:	Cost Est-HOM ARP





## **NOTICE OF SPECIAL FEDERAL FUNDING ALLOCATION PUBLIC MEETINGS**

### **HOME-ARP**

Through the federal 2021 HOME-American Rescue Plan (HOME-ARP), the City of Gainesville has received a special allocation of \$1,968,639. This funding is available to reduce homelessness and increase housing stability for vulnerable populations, as a result of the COVID-19 pandemic.

### **CDBG-CV**

Through the federal 2020 Community Development Block Grant (CDBG) CARES Act, the City of Gainesville has received a special allocation of \$1,001,999 (CDBG-CV3). Remaining funds available from CDBG-CV1 (\$259,441) will also be included for use to prevent, prepare for, and respond to the economic fallout of the COVID-19 pandemic. The use of these funds to support Public Services and Housing initiatives, was approved by the Gainesville City Commission on July 29, 2021.

Funds must be used to address eligible activities established by federal regulation. Examples of eligible activities include:

#### **CDBG-CV3**

- \* Buildings and Improvements
- \* Assistance to Businesses
- \* Provision of Public Services
- \* Planning, Capacity Building, and Technical Assistance

#### **HOME-ARP**

- \* Production or Preservation of Affordable Rental Housing
- \* Tenant- Based Rental Assistance (TBRA)
- \* Supportive Services, Homeless Prevention
- \* Housing Counseling
- \* Purchase and Development of Non-Congregate Shelters

To learn more about the HOME-ARP Program, and to prioritize funding allocations and identify unmet needs, the City is asking for your input. The City encourages residents and stakeholders to visit the following website: <https://www.fhconnect.org/engage-gainesville>.

### **CDBG AND HOME**

Through the federal Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME), the City of Gainesville has been notified of its Fiscal Year 2022-2023 allocations of \$1,305,794 (CDBG) and \$600,702 (HOME). This funding is available to provide Public Services and Housing programs to benefit very low, low and moderate income persons residing within the city limits of Gainesville.

In addition, the City will provide two (2) opportunities for in-person meetings to ask questions and provide input regarding these federal funding allocations. The first opportunity will take place **from 6:00**

**p.m. to 7:30 p.m., on Wednesday, July 27, 2022, at the GRU Multi-Purpose Room, 301 SE 4<sup>th</sup> Avenue. A second opportunity to discuss these funding allocations will take place from 6:00 p.m. to 7:30 p.m., on Wednesday, August 3, 2022, at the Historic Thomas Center, in the Long Gallery, 302 NE 6<sup>th</sup> Avenue.**

For more information, please send an email to [cockerhamfv@gainesvillefl.gov](mailto:cockerhamfv@gainesvillefl.gov), or call (352) 393-8864.

*The City of Gainesville is an Affirmative Action/Equal Opportunity/Drug Free Workplace Employer. The City of Gainesville is committed to a policy of non-discrimination in all City programs, services and activities, and will provide reasonable accommodations upon request. The public hearing will be held in a location that is accessible to persons with disabilities. To request accommodations for non-English speaking persons, individuals with disabilities, and individuals with hearing impairments, please contact the City of Gainesville Office of Equity and Inclusion at (352) 334-5051 (voice) or (352) 334-2069 TDD; TTY users please call 711.*

#### **FAIR HOUSING/EQUAL OPPORTUNITY/DISABILITY ACCESS JURISDICTIONS**



# City of Gainesville GNV News

July 6, 2022 edition



## Upcoming Week at a Glance

*Click through for more information on each event or search below for featured event articles.*

July 8: [Free Fridays concert](#)  
July 10: [Perspectives in the Park](#)

July 10: [Ranger-led Tours at Sweetwater Wetlands](#)

## New and Notable

### **Special Allocation Planning for CDBG and HOME Funds**

Through the federal CARES Act and the American Rescue Plan (ARPA), the City of Gainesville has received special allocations of Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) funds.

To prioritize funding allocations and identify unmet needs, we are asking for your input. We encourage Gainesville residents and stakeholders to engage through the various tools online. You will be able to share your ideas in our online forum, via a survey or ask questions. The survey is available until Monday, Aug. 1, 2022

**Give your feedback!**

## Save the Date for Commissioner Chestnut's Town Hall - Aug. 8

Commissioner Cynthia Chestnut is holding a Town Hall Monday, Aug. 8 at 6 p.m. at Mount Pleasant United Methodist Church (630 NW Second Street) titled "Everything you wanted to know about single-family (exclusionary) zoning."



No matter where you live in the U.S.,  
you can easily access 24/7 emotional support.

Call or text 988 or visit [988lifeline.org/chat](https://988lifeline.org/chat) to  
chat with a caring counselor.

We're here for you.



## New Suicide and Crisis Lifeline Available Nationally

Last October, Gainesville switched to 10-digit dialing. This was one of the first steps needed to create a 3-digit number for the National Suicide Prevention and Mental Health Crisis Lifeline.

The new number, 9-8-8, launched in July 2022. No matter where you live in the U.S., you can easily access emotional support 24/7.

Call or text 988 or visit  
with a caring counselor.

to chat

## Special Allocation Planning for CDBG and HOME Funds

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**Give your feedback!**

## Final Heatwave Pool Party of the Summer - This Sunday

The final of the summer is this Sunday, July 24 from 1-5 p.m. at Mickle Pool!. Enjoy free swimming, dancing, music and food!.



## Special Allocation Planning

U.S. Department of Housing and Urban Development (HUD)

City of  
**Gainesville**

# Help us create a spending plan!

**Your input is invaluable  
as it will inform funding  
allocations.**

Through the federal CARES Act and the American Rescue Plan (ARP), the City of Gainesville has received special allocations of Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) funds.

To prioritize funding allocations and identify unmet needs, we are asking for your input. We encourage Gainesville residents and stakeholders to engage through the various tools available at:

<https://www.fhcconnect.org/engage-gainesville>

**Share your ideas in our online forum, via a survey, share your ideas and ask questions!**

**We've made it easy for you to:  
Join the conversation!**

<https://www.fhcconnect.org/engage-gainesville>



## Special Allocation Planning

Through the federal CARES Act and the American Rescue Plan (ARP), the City of Gainesville has received special allocations of Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) funds.

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<https://www.fhcconnect.org/engage-gainesville>

You will be able to share your ideas in our online forum, via a survey or ask questions. The survey will be available for participation until August 1, 2022



 **Download Flyer**

**Take Survey**



# Survey on Special Allocation Planning for CDBG and HOME Funds

Published on July 07, 2022

The City of Gainesville has received special allocations of Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME) funds through the federal CARES Act and the American Rescue Plan (ARPA).

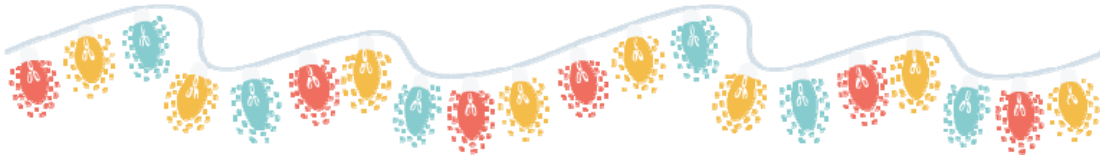


Please help us identify priority needs related to housing, community revitalization and homelessness in the City of Gainesville by completing our priority needs survey. Results of the survey will help inform strategy selection for the use of CDBG-CV3 and HOME-ARP funds. We encourage Gainesville residents and stakeholders to engage through the various tools online. You will be able to share your ideas in our online forum, via a survey or ask questions. The survey is available until Monday, Aug. 1, 2022. [Give your feedback today!](#)

## Tagged as:

Announcements

## Did you know you can recycle your holiday lights?



### HOME-ARP Draft Allocation Plan

The City of Gainesville has received a special allocation of almost \$2 million from the federal government. Before the city can spend that money, the City Commission must approve a spending plan. These funds must be used to reduce homelessness and increase housing stability for qualifying populations.

Qualifying populations include: homeless; at-risk of homelessness; fleeing, or attempting to flee, domestic violence; dating violence, sexual assault, stalking, or human trafficking; other populations where providing supportive services or assistance would prevent a family's homelessness; and veterans and families that include a veteran family member that meet one of the preceding criteria.

A draft version of the plan is available on our website, and public comments are being accepted through Thursday, Dec. 8

[View the draft document](#)

[Make public comments on draft plan](#)

### Out of School Days

[Out of School Days](#) offers all day activities for days Alachua County Public Schools are closed, providing a safe and enjoyable environment for children in 1st through 8th grades. The program enhances the children's physical, social and mental awareness by providing sustainable healthy lifestyle lessons and building positive character development through learning teamwork and creating art projects together. Our dedicated staff is committed to keeping children safe while they learn and have fun! Out of School Days hours are 7 a.m.- 6 p.m. on the following dates:

- Tuesday, Dec. 27
- Wednesday, Dec. 28
- Thursday, Dec. 29
- Friday, Dec. 30
- Friday, Jan. 13
- Monday, March 27

### Parks, Recreation and Cultural Affairs Needs Assessment Community Workshops - Save the Date!

The Parks, Recreation and Cultural Affairs Department (PRCA) wants to hear from you! Please join one of three public workshops that are being held across the city in various locations to provide your thoughts, opinions and feelings to inform the PRCA Master Plan Update.

The Vision 2020 Master Plan was initially conducted in 2012 to help guide the department for 20 years. Since 2022 is the 10-year mark PRCA is updating the plan to capture the changing needs of our community.

- Thursday, Jan. 5 from 5:30-7:30 p.m. at Duval Early Learning Academy cafeteria (2106 NE Eighth Ave.)
- Monday, Jan. 9 from 5:30-7:30 p.m. at the Senior Recreation Center (5701 NW 34th Blvd.)



# Survey Results Public Comments

# Priority Needs Survey

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## **SURVEY RESPONSE REPORT**

02 June 2022 - 13 December 2022

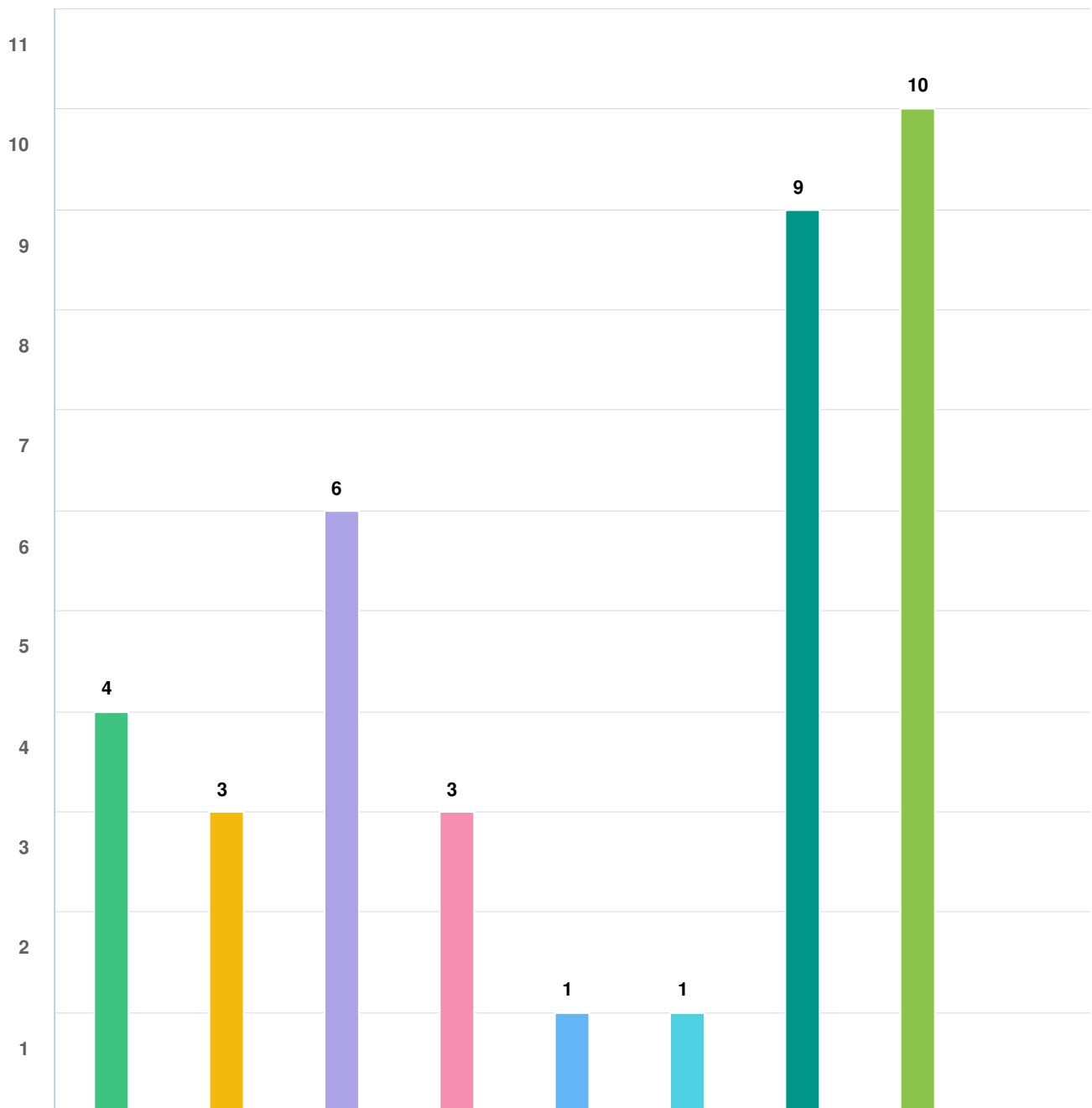
**PROJECT NAME:**  
Engage Gainesville



# SURVEY QUESTIONS



**Q8 What is your involvement with the following qualified populations: homeless; at-risk of homelessness; fleeing domestic violence, sexual assault, stalking, or human trafficking; veterans; families; or other populations?**



**Question options**

- Emergency/Temporary Shelter Provider
 ● Permanent Supportive Housing or Rapid Re-Housing Provider
- Supportive Services Provider
 ● Housing Provider/Landlord/ Property Manager
 ● Affordable Housing Developer
- Funding Provider / Resource
 ● Community Advocate
 ● Not Applicable
- Individual Experiencing or Experienced Homelessness

Mandatory Question (23 response(s))

Question type: Checkbox Question



**Q9 Rank the following in order of importance to indicate which activities most effectively decrease homelessness.**

OPTIONS	AVG. RANK
Supportive Services	2.96
Development of Affordable Rental Housing	3.00
Tenant-Based Rental Assistance (TBRA)	3.04
Non-Profit Operating Funding (only 5% of total funding is eligible)	3.65
Acquisition and Development of Non-Congregate Shelter	3.87
Non-Profit Capacity Building (only 5% of total funding is eligible and only for organizations that serve homeless populations)	4.48

*Mandatory Question (23 response(s))*  
*Question type: Ranking Question*

**Q10 Rank the following in order of importance to indicate which supportive services are most needed to decrease homelessness.**

OPTIONS	AVG. RANK
Case Management Services	2.26
Housing Location Services	2.96
Homeless Prevention Services	3.35
Life Skills Training	3.87
Housing Counseling	4.00
Job Readiness	4.57

*Mandatory Question (23 response(s))*  
*Question type: Ranking Question*

**Q11** Rank the following in order of importance to indicate the best way to develop and provide non-congregate shelter.

OPTIONS	AVG. RANK
Acquisition / Conversion of Vacant Buildings for Non-Congregate Shelter	1.52
Conversion of Existing Congregate Shelters	2.65
Hotel / Motel Rooms	2.78
Scattered Sites	3.04

*Mandatory Question (23 response(s))*  
*Question type: Ranking Question*

**Q12** Rank the following in order of importance to indicate which rental housing activities are most needed to decrease homelessness.

OPTIONS	AVG. RANK
Rental Assistance	2.22
Permanent Supportive Housing	2.26
Creation of New Affordable Rental Housing	2.70
Rehabilitation of Existing Units	2.83

*Mandatory Question (23 response(s))*  
*Question type: Ranking Question*

**Q13** The HUD special allocations provide a one-time opportunity to create programs/services that would have a significant impact on the community. Please provide any other comments, regarding eligible use of funds, that we should consider.

Anonymous  
7/07/2022 04:14 AM

Free Busing Program, Subsidized Daycare (including night option) for working mothers, food distribution points away from Downtown

Anonymous

7/07/2022 08:18 AM

There should be buy-in from those individuals receiving assistance. In other word's there must be some form of required payment plan, volunteer hours etc. Knowing that they have some "skin in the game" helps to create a stronger community.

Anonymous

7/14/2022 09:04 PM

I am a part of an organization that is doing great work with the elderly and kids at risk we feed, clothe and educate

Anonymous

7/15/2022 01:40 PM

Dedicated counselors who maintain, establish, and cultivate relationships with rental property owners and managers to ensure access to housing, who work to also ensure those entities follow city ordinance and applicable law (eyes and ears).

Anonymous

7/16/2022 06:22 PM

Community gardens, housing for artists at risk of homelessness

Anonymous

7/20/2022 04:48 PM

While not as visible, homelessness prevention and improving the quality of the current affordable housing should be priorities.

Anonymous

7/28/2022 12:49 PM

Where people are able to go to sleep at night affects their ability to handle any other aspects of their lives. HUD and municipalities should prioritize the construction and logistics needed to get everyone to safe, decent housing every night.

Anonymous

7/30/2022 01:50 PM

Socioeconomic and racial equality is common place in both local neighborhoods and schools . Funds should be revitalize East Gainesville affordable living to spur economical development which will create a sense of involvement for the community.

Anonymous

8/02/2022 05:35 AM

For the long-term, creating new affordable housing is critical. Until that exists, we need stopgap funding for agencies provided housing-related crisis services. COVID has had an outsized impacted on staff, reserve funds, capacity, and ability to grow.

**Optional question** (9 response(s), 14 skipped)

**Question type:** Single Line Question

## City of Gainesville Public Comments and Responses

### **Comment 1:**

“I am writing, first, to thank you for the public engagement process you have used to determine the most appropriate use of nearly \$2,000,000 of HOME-ARP funding. The current allocation plan proposes to put the full amount - less 15% grant administration expenses - toward long-term affordable housing development. This overlooks key feedback gained through the public participation process.

Respondents clearly indicated that the development of affordable rental housing was a key priority, *in addition* to the provision of supportive services and capacity building/operational expenses for nonprofits. The needs assessment confirms this, noting that access to services is a key gap in the homeless service delivery system. The current recommendation fails to consider those additional critical needs in the community.

The expansion of affordable housing stock in our community is perhaps the most pressing issue this commission will address over the next few years. This immediate need, however, requires both long-term and immediate solutions. In the interim, we need to ensure existing social and supportive services providers have appropriate operational capacity to meet the immediate needs of vulnerable populations until new housing units come online.

I am writing to request the Commission reallocate a minimum of \$500,000 of HOME-ARP funds into the supportive services, nonprofit operating, and/or nonprofit capacity building categories. This reallocation will leave more than a million dollars in the pot for affordable rental housing development while providing for immediate needs of local nonprofits.

I will be out of town during the meeting where this will be discussed. I can be reached in advance of that meeting at this email address if you have any questions about this recommendation.”

### **Comment 2:**

“As a housing and services provider, I am very excited that the community is being given a chance to weigh in on the use of the nearly \$2,000,000 of HOME-ARP funding. After reading the report, I see that the current allocation plan has the full amount, with a carve out for grant administration expense, allocated to long-term affordable housing development. However, this overlooks a huge community gap in capacity building for those of us who will be managing the vulnerable populations that will be served in the units created. This was key feedback that was provided in the surveys sent out.

All of us doing housing agree that the development of affordable rental housing is a key priority, but it must include a provision of supportive services and capacity building/operational expenses for nonprofits who will be tasked with doing the case management, follow up and coordination of services for these individuals and families. Without this component, I fear that those of us in the system of care will again be asked to do more, with the same or less for the support of our staff

and programs. Increasing the availability of new affordable housing units is critical and a lasting legacy this community deserves. I hope that the allocation described will NOT include funds to landlords to update existing units – which has no net effect on the number of units available, and may actually increase rental prices.

I am proposing that the Commission reallocate a minimum of \$500,000 of HOME-ARP funds into the supportive services, nonprofit operating, and/or nonprofit capacity building categories and use of remaining funds to bring in NEW housing units. This would address both the capacity building need, and ensure that more housing is created, and is not substituted with upgraded existing units.”

**Response to Comments 1 & 2:**

Thank you for your comments and feedback on the proposed use of HOME-ARP funds.

The Draft Home-ARP Allocation Plan (Plan) for the City of Gainesville (City) was carefully compiled after several months of consultation and outreach to the community-at-large, private and public stakeholders, Community Partners and Community Builders. Additionally, a Homeless Needs Assessment and Gaps Analysis was completed to quantitatively and qualitatively identify housing inventories, population trends and the impacts these ultimately have on the need for and access to affordable shelter.

Community feedback was considered as one component to identifying strategies. However, to ensure maximum impact for use of funds, consideration was also given to the needs assessment and gaps analysis, review of current programs and activities, resources available, and organizational capacity. This is detailed on pages 24 and 25 of the Allocation Plan.

Based on the overwhelming identification of the need for rental units, the City’s HOME-ARP will utilize \$1,673,343.15 for the Development of Affordable Rental Housing. New rental units are to be constructed, thereby following the City Commission’s vision and directive to provide affordable housing within the municipality, while remaining aware of relevant guidelines within the city’s Strategic Plan (City Vision: Principle 1 – Equitable Community for All and the first objective of Goal 3: A Great Place to Live and Experience).

Ongoing community support to assist those in need is highly important and the city annually assists in this manner through the availability of its Public Services allocation utilizing Community Development Block Grant (CDBG) funding. However, this competitive allocation only serves as a leverage to the additional funding that agencies must have in order to remain viable to complete the important services they deliver.

As HOME-ARP funding is a one-time allocation which is to be leveraged for greatest community impact, HUD has determined that non-profit capacity building and non-profit operating categories are both capped at five percent (5%) of the total allocation. This means that only \$98,431 for each of these categories is allowed, for a maximum total of \$196,863. Therefore, allocating \$500,000 towards capacity building and non-profit operating is not allowed and would put the city out of compliance with federal regulations. It was further determined that the small allocations allowed under these categories would not be considered the best use of the city’s HOME-ARP funds.

The Draft HOME-ARP Allocation Plan was approved for submission to HUD by the City Commission on December 1, 2022. Once federal approval is received, actual construction guidelines and processes will be finalized, presented for community feedback and leadership approval, so that new affordable rental units may be completed for occupancy as soon as possible per HUD deadlines and guidelines.

Please let me know if you have questions or need additional information.

**Comment 3:**

“Until page 17, there is no mention of the acronym “PJ”, but it occurs frequently from then on. Where is the explanation of what this means? The initial clarification of acronyms is such a basic requirement in government documents that I am dumbfounded as to why this is not provided!

With almost \$2 million on the line, I guess we now know exactly why the City Commission was so eager to change the Comp Plan to allow money-making ADUs that will not require that the “landlord” also lives on the property!”

**Response to Comment 3:**

Thank you very much for your comments on the Draft of the City of Gainesville HOME-ARP Allocation Plan.

In response to your inquiry of the italicized template-based questions formulated by the U.S. Department of Housing and Urban Development (HUD), which use the acronym PJ and appear on pages 17, 23, 24, 26, 27, 28, 31, 34, 35, 36, 37, 38, please review the following definition:

**Participating Jurisdiction (PJ)**

Participating Jurisdiction means any State or local government that has been designated by HUD to administer a HOME program

However, possible unfamiliar terms and acronyms were identified as applicable, during our applicant responses to questions.

Additionally, the Office of Housing & Community Development (HCD) will most certainly include your notable concern on landlord residency/responsibilities as the program specifics of the entire HOME-ARP Allocation Plan are formulated, once HUD approval of the Plan is received.

Please let me know if you have other questions or need additional information.

**Comment 4**

“I was surprised to read that the Commission approved this plan on December 1. I had sent in my response based on communication I’d received from the city stating that Public Comment on this issue was being accepted through Thursday, December 8 - a full week after the Commission made its decision.”

#### **Response to Comment 4**

Thank you for your comments.

One of the many ways in which opportunities are offered for citizen comments, is to provide as much time as possible for review and responses to various matters of interest. Allowing public comments after a governing body's decision is not uncommon and indicates a willingness to further consider any future actions related to an activity or project.

The submission of the HOME-ARP Allocation Plan is only the first step in the required work. After HUD's review and hopeful approval, the real tasks will begin, as the City of Gainesville seeks to increase the availability of affordable housing via the construction of new rental units. All required components (design, engagement, procurement, and subsequent leadership approvals) must and will take place during this process to ensure transparency and success.

The Office of Housing & Community Development (HCD) appreciates the many efforts of GRACE Marketplace to assist our homeless neighbors. We are confident that this HOME-ARP Allocation will be another viable tool to address our area housing shortage and impact the target population.



