



**City of Hammond Indiana**  
**HOME-ARP Allocation Plan**  
**FINAL**  
as of  
**June 20, 2023**



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## **Executive Summary**

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The City of Hammond will receive an allocation of \$1,765,004 of HOME – American Rescue Plan (“HOME-ARP”) appropriated under section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2). The purpose of the funds is to address the needs of households experiencing homelessness and other households that face housing instability. The City may use the funds for a limited number of eligible activities, including the development and support of affordable housing, tenant-based rental assistance (TBRA), the provision of supportive services, and the acquisition and development of non-congregate shelter units. A portion of the funding can be used for administrative and planning purposes and the support of local non-profit stakeholders.

The funding is administered by the U.S. Department of Housing and Urban Development (HUD). HUD requires the City to conduct a planning process and submit the information in this document in order to qualify for its HOME-ARP funding. All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*.

The City encourages public input on the proposed use of HOME-ARP funds described in this document. Public comments can be submitted a number of ways:

- Via email to [millero@gohammond.com](mailto:millero@gohammond.com) .
- Via the website posting of this document at: <https://www.gohammond.com/news/>
- Via US Mail to:

ATTN: HOME-ARP  
Hammond City Hall, Room 314  
5925 Calumet Avenue  
Hammond, IN 46320

The City will consider all comments received before 4:30 PM on March 27<sup>th</sup> , 2023, before submitting the proposal to HUD. All accepted comments and the City’s responses will be included in the final submission to HUD. The City will continue to accept comments from the public after its submittal and use public comments to guide and inform possible future amendments. The City will also conduct a public hearing on the proposed use of HOME-ARP funds on March 7<sup>th</sup> , 2023 at 4:30 in Common Council Chambers at Hammond City Hall, 5925 Calumet Avenue. Council Chambers are accessible to persons with physical disabilities. If special arrangements need to be made to accommodate citizens in order for them to participate in the public hearing, please call the Department of Community Development at (219) 853-6358 ext. 2.

### **AMENDMENT**

At HUD’s request, the City held an additional public hearing on May 16, 2023 and accepted further public comments through May 17. A public notice for the hearing was posted to the

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City's website on May 8<sup>th</sup>, including a full translation of the notice in Spanish to accommodate the needs of persons with Limited English Proficiency (LEP). No comments were received at the public hearing. The City received one comment via email which suggested that funds be used to help families with financial assistance for rent and utility deposits and first month's rest. The commenter also suggested the development of additional shelter units, even if they were temporary.

## **Consultation**

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

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

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

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

The City conducted outreach to the Continuum of Care, public agencies, homeless service providers, the Hammond Housing Authority, and other social service providers to determine the best way to utilize the available HOME-ARP funding to meet the needs of the identified populations. Informal outreach occurred throughout 2022 at regional meetings such as the Continuum of Care and the Lake County Housing Taskforce. The City also participated in planning discussions with the other HOME-ARP recipients, including Lake County, the City of Gary, and the City of East Chicago. The City conducted more formal consultations with key stakeholders in December 2022 and January 2023. A summary of the feedback received through the consultation process is included below.

*List the organizations consulted:*

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Hammond Housing Authority</b>	Affordable Housing , Public Housing Authority	Email	See below
<b>NWI Continuum of Care Region 1a</b>	Continuum of Care	Email, Phone	See below
<b>Innermission</b>	Homeless Service Provider	Email, Phone	See below
<b>We Care From the Heart</b>	Homeless Service Provider	Email, Phone	See below
<b>Haven House</b>	Homeless Services, Domestic Violence	Email, Phone	See below
<b>A Safe Haven Veterans Housing</b>	Affordable Housing Provider, Veterans	Email	See below
<b>Northwest Indiana Reinvestment Alliance</b>	Housing Counseling, Fair Housing	Email	See below
<b>Hammond Human Relations Commission</b>	Fair Housing	Email, Phone	See below
<b>School City of Hammond (Homeless Liaison)</b>	Public Agency, homeless service provider	Email, Phone	See below
<b>Hammond Disabilities Commission</b>	Persons with Disabilities	Email	See below
<b>Lake County</b>	Public Agency	Email, Phone	See below
<b>City of Gary Indiana</b>	Public Agency	Email, Phone	See below
<b>North Township</b>	Public Agency, Service Provider	Email	See below
<b>Hammond Police Department</b>	Public Agency	Phone	See below
<b>Hammond Legal Aid</b>	Social Service Provider	Email, Phone	See below
<b>Greater Hammond Community Services</b>	Social Service Provider	Email, Phone	See below
<b>Mental Health America</b>	Social Service Provider	Email	See below
<b>State Street Shelter</b>	Homeless Service Provider	Phone	See below
<b>Northwest Indiana Community Action</b>	Social Service Provider	Email	See below

<b>Lake County Affordable Housing Taskforce</b>	service providers, and housing professionals	February Meeting	See below
<b>Lake County Veterans Service Office</b>	Veterans	Phone	See below
<b>American Veterans Collection</b>	Veterans	Phone	See below
<b>United Way Northwest Indiana</b>	Social Service Provider	Phone	See below
<b>St Vincent DePaul</b>	Social Service Provider	Phone	See below
<b>Fair Haven Rape Crisis Center</b>	Domestic Violence, Trafficking Victim Service Provider	Email	See below



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

**Continuum of Care Region 1a**

The City consulted with the lead agency of the local region for the balance of state Continuum of Care, staff from Indiana Housing and Community Development Authority (IHCDA) staff, as well as the member agencies who participate in the CoC. Lack of affordable rental housing was cited as one of the biggest needs, as well as supportive services to match homeless to housing. There have been many cases where clients are provided with resources, such as a housing voucher, but they are unable to find a landlord willing to accept them. A housing navigator to match clients to available housing is needed.

**Greater Hammond Community Services**

This agency saw a number of unmet needs, including expungement and transportation and other wrap-around services for persons trying to exit homelessness. Specific populations with unmet needs included adjudicated persons and those currently receiving rental assistance. Many families resort to motel stays due to history of evictions and/or bad credit.

**Haven House**

This domestic violence service provider sees an increasing need in their services, including shelter and supportive services. They have had to rely on motel stays to accommodate need in the last six months. Supportive service needs include financial planning/budgeting, job training, and child care, legal assistance, health, and transportation. Mental health and substance abuse are two critical factors that must be addressed.

**Hammond Housing Authority**

The Housing Authority cited the need for security deposits for their housing voucher holders in qualifying for rental housing. The Housing Authority also sees the need for additional affordable rental housing and is pursuing the preservation of existing units and development of additional units.

**Hammond Disabilities Commission**

Members of the Commission felt that access to services (transportation), a centralized resource database, rental assistance, and supported living services were all needed. This would include case management and wraparound services. Identification bracelets similar to those worn by persons with autism may help during interactions and outreach for persons with disabilities and working with first responders and social service providers.

**Hammond Human Relations Commission**

In terms of housing services, this agency provides fair housing services as well as landlord-tenant mediation. Numerous issues were cited, including difficulties in finding units for adjudicated persons, even if the conviction was over 20 years old. There is also a need to better address substandard housing as tenants cannot withhold rent if the unit has issues. This agency

also cited rapid rent increases as an issue with case of rents increasing by hundreds of dollars upon renewal.

**Hammond Legal Aid**

This agency stated that need for additional services as rents continue to go up. The systems put in place to help with evictions as part of COVID and the ERAP programs in partnership with the courts were effective. There is a need to build stronger relationships with housing providers. Incentives such as rehabilitation assistance may be helpful.

**Innermission**

This agency provides both shelter and supportive services to homeless and those at risk of homelessness. The agency is starting a six month supportive service program to meet the needs of the clients it currently serves. Attempting to have persons move straight from homelessness to independent living is very challenging. They stated that the one of the biggest obstacles and frustrations of private housing providers (landlords and property managers) are the delays in receiving payment.

**Lake County Housing Taskforce**

Data was provided on foreclosure sales throughout Lake County in the fourth quarter of 2022. Hammond accounted for about 20% of the foreclosures. Participants in the taskforce meeting saw a need for additional housing and support for persons struggling with mental health issues.

**Lake County**

Lake County expressed a need to coordinate with other local jurisdictions, including the City, to address the needs of the qualifying populations.

**Mavor's Commission on Disabilities**

Members of the Commission felt that consideration should be given to homeless veterans, creating housing stability and accessing public services. Supportive services include employment training, transportation, mental health, emotional support, available medical and basic needs programs funded through the state. Suggestions for additional programming included supported living, case management support at the city level, and expanding a program like the Autism Identification bracelet to all other persons with disabilities, persons experiencing homelessness, and the elderly. They also cited a need to strengthen connections between these populations, service providers, first responders and social work services.

**North Township**

This agency cited the continuing need for rental assistance similar to the City's current rehousing, prevention and HOME tenant-based rental assistance program. The agency stated that in one month it receives about 150 calls for assistance with most of them regarding rental assistance.

**Hammond Police Department**

There are currently five chronically homeless men living in and around Hammond. The Police Department is often called to deal with homeless persons who are viewed as a nuisance for businesses. One individual as over 30 no trespassing orders. Better coordination is needed to help those living on the streets. In terms of solutions, longer term housing needs to be paired with wraparound services, including transportation. Some individuals will need intensive support services, such as those with mental health issues who need to stay on medication to achieve stability.

**Northwest Indiana Community Action**

Availability of affordable housing and shelters are both needed, as well as a housing navigator whose task is to help people find affordable units. Needed supportive services include housing for mental health, child care, transportation, and bilingual support groups. Preferences should be given to families with high housing cost burdens or other cost burdens, including childcare, transportation, or medical.

**Northwest Indiana Reinvestment Alliance**

This agency saw a large gap in the housing and shelter system. There is a need for both short term emergency assistance and long term solutions like the creation of more affordable housing. Housing costs have increased significantly in the last 2 years leading to an increase in homelessness, foreclosures and evictions. Many clients are unaware of the resources and programs that may be beneficial for them and do not have access to technology to request assistance properly. Preferences should be made for the chronically homeless, families with children and victims of domestic violence.

**St Vincent DePaul**

This organization provides supportive services and some rental assistance through four Catholic churches in Hammond. In consultation, representative provided information about the level of need they are seeing on a monthly basis and shared information about their programs.

**School City of Hammond**

The City consulted with the homeless liaison regarding the needs of homeless and at-risk children attending the Hammond school system. Many of these families would qualify for HOME ARP assistance as literally homeless, at-risk of homelessness, or “at greatest risk of housing instability”. On average, the school serves two hundred homeless children every year. Overall, the biggest issue is affordable housing. Families are seeing large increases in rents when renewing their leases. Types of assistance needed include rental assistance as well as security deposits and application fees. In depth case management and housing placement was also cited as a need.

**We Care From the Heart**

This agency cited a need for non-congregate shelter, housing and supportive services. They currently run a non-congregate shelter / shared housing facility that may be replicated. They also saw unmet needs for seniors having trouble maintaining their homes and immigrant populations.

**Mental Health America**

Many families are currently doubled up with relatives due to housing costs or not meeting income requirements of landlords. Some voucher holders cannot find landlords who will accept their vouchers. A lack of collaboration between housing providers, housing authorities, and other stakeholders in the community is an issue.

**State Street Shelter**

The shelter has some needs in regard to maintenance and repairs. They also are in need of a passenger van to provide transportation.

**United Way Northwest Indiana**

The agency provided information on its case management program and information systems that can assist with collaboration. They also shared their strategic plan

**American Veterans Collection and County Veterans Service Office**

There is a dire need for transitional housing for veterans. There is also a need to help veterans connect to and apply for existing resources available to them. The Service Office is considering opening a satellite office to help increase availability/accessibility.

**Fair Haven Rape Crisis Center**

This agency provided estimates for the needs of domestic violence and trafficking victims. In 2022, the agency provided services to 469 victims/survivors. The agency shared that overall, 41% of women and 26% of men experience sexual violence, physical violence, and/or stalking by an intimate partner and reported an intimate partner violence-related impact during their lifetime.

## Public Participation

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

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

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

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

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

- *Date(s) of public notice: 2/17/2023*
- *Public comment period: start date – 2/27/2023 end date – 3/27/2023*
- *Date(s) of public hearing: 3/7/2023*

*Describe the public participation process:*

In addition to the consultation process, the City followed a modified public participation process, including public notice announcing the availability of the plan for review, a public comment period, and a public hearing. The public notice was published on the City’s website and sent to interested parties on February 17<sup>th</sup>.

*Describe efforts to broaden public participation:*

The City will follow its adopted Citizen Participation Plan that includes efforts to broaden participation. This includes publication of the draft plan for comment, direct outreach to interested community partners, and issuance of announcements on social media outlets. The City will provide for accessibility to persons with disabilities by holding public hearings at ADA accessible locations. Provision for reasonable accommodations will be made when requests are made at least five working days prior to a hearing. The City will also provide

translation for persons with limited English proficiency when requests are made at least five working days prior to a hearing.

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

The City will summarize comments and recommendations in this section as it receives them. Comments received include the following:

- Public Comment Period:
  - Provide 24 hour shelters, including separate shelters for women, men, and veterans. Shelters need to be adequately staffed with full time security. Do not use the funding to create useless positions. Focus should be on meeting the immediate needs and not so much on long term planning.
  - I think that's a great idea for people who need rental assistance. If it's possible, some money can be used to help repair homes in need of some updating.
  - Obstacles to stability include affordable rents, being on waitlists, bad credit, and basic independent living skills. Families need a steady job at \$12-13+ per hour to secure stable housing.
  - "Its Gary's Time", an organization that works with re-entry, skills training and employment, would like to be involved in the conversation around the HOME-ARP plan and would like to be advised on the next steps to be considered.
- Public Hearing (<https://youtu.be/Yt-A9maFEr4>) :
  - Hammond needs to step up to meet needs of veterans like other neighboring communities who have built 70 unit facilities. There are organizations interested in partnering with the City to meet this need, including the VA and Safe Haven.
  - Gatehouse Sober Living is requesting funding to support the operations of their group homes that assist those addressing substance abuse issues. They have three properties that currently serve 17 women.
  - St Vincent DePaul serves those in need at four catholic churches with food pantry and other supportive services, including some rental assistance. There may be some opportunities for partnership and collaboration.

- One commenter wanted more information about criteria for qualifying for the projects.
- Housing stability for persons with disabilities and persons with autism.

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

The City accepted all comments received.

## Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

### Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	12,334		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	3,365		
Rental Units Affordable to HH at 50% AMI (Other Populations)	2,130		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		2,220	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		390	
<b>Current Gaps</b>			2,610

**Data Sources:** 2021 American Community Survey, 2022 Consolidated Plan, 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)



**Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory*					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	97	22	161	161	36								
Transitional Housing													
Permanent Supportive Housing	169	50	233	233	106								
Other Permanent Housing**	35	10	9	9	0								
Sheltered Homeless						25	136	59	23				
Unsheltered Homeless						3	48	0	0				
<b>Current Gap</b>										14	42	39	39

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

### **Qualifying Populations**

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

### **HOMELESS**

as defined in 24 CFR 91.5

The data included in this section comes from the 2022 Point in Time (PiT) Count and a longitudinal study conducted by IHCD. It should be noted that the Point in Time Count information is based on the data for Lake County. The IHCD data includes information for the Balance of State CoC as a whole, which includes a much larger geography. It should also be noted that the Point in Time Count is only one measure of homelessness and may not accurately reflect the total unsheltered population. It is difficult to obtain an accurate count of unsheltered persons on a single night.

According to the 2022 PiT Count, there was a total of 212 homeless households in Region 1a, including 272 persons. Three of every four of the households were sheltered while one fourth were unsheltered.

Of the sheltered population, about one fourth of the persons were under the age of 18. Only twelve percent of the unsheltered population was under the age of 18. Approximately one third of the adults reported having serious mental illness while only thirteen percent reported a substance abuse issue. It should be noted that this data only includes sheltered individuals. Unsheltered persons most likely have comparable or greater incidence of mental illness and substance abuse.

In households with children, half of the population (32) was White, forty percent (25) were African American, and twenty-seven percent (17) of the population was Hispanic (please note that some persons are included in more than one category).

In households without children, two thirds of the population was male. Seventy percent of this population was African American, twenty-five percent were White, and six percent were Hispanic.

Fifty-nine veterans were included in the PiT count, all of whom were counted as sheltered. All of the veterans were in households without children. Forty percent were considered to be chronically homeless. Seventy percent are African American. Only ten percent of veterans were women.

In terms of prior living situations, about one third of all households entering the system came from a permanent housing situation. About one fourth of households came from living on the street. The remaining 40% came from temporary situations, institutions, and other living situations.

Most of the persons (71%) entering the continuum of care were “first-time” homelessness. Approximately 1 of every 5 persons (18%) served were reported as “continuously homeless”. This is comparable to the 13% identified as chronically homeless. The remainder (10%) were a mix of persons re-entering the system from permanent or temporary housing situations.

The average cumulative days homeless is 114 days. About one third (32%) of persons exit the continuum to permanent housing destinations, such as a rental unit. The average length of time homelessness was comparable for both household types. There was a fairly large distribution amongst length of homelessness for both household types as well. The percentage of households with a length of homelessness less than 30 days was 42% and 37% for adult only and family households, respectively. The percentage of households with a length of homelessness longer than six months was 27 and 16% for adult only and family households, respectively.

Only six percent of homeless persons return to the system after leaving<sup>1</sup>. When looking at the data by household type, families with children fair better. Only 26% of “adults only” households exited to permanent destinations compared to 55% for family households.

#### **At Risk of Homelessness**

as defined in 24 CFR 91.5

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

HUD’s Comprehensive Housing Affordability Strategy (CHAS) data for the City of Hammond demonstrates there are 3,615 renter households below 30% AMI. Of these households, 2,220 have a severe cost burden, meaning that more than half of their income is used to pay for housing costs.

In consultation with the local school district, their homeless liaison typically works with approximately two hundred students who qualify for homeless assistance. Families are seeing large increases in asking rents when leases are renewed. In one instance the asking rent was increased from \$800 to \$1,200. There are also many families currently living in the home of another trying to save for security deposits.

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<sup>1</sup> IHCD Longitudinal Study for October 2020 through September 2021.

**Domestic Violence**

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

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

According to the Point in Time Count, there were 23 households that reported domestic violence. All of the households were housed in emergency shelter. This represents a doubling of the number reported in 2021. Similar to the overall homeless populations, local advocacy groups believe the actual number of persons suffering from domestic violence to be much higher. According to a local DV service provider, one of every three women and one of every four men are victims of domestic violence. A non-profit providing counseling to DV victims served 314 clients in the last program year.

The City has a shelter that caters to the needs of victims of domestic violence. During the consultation, the stated that they needed to use motel vouchers to accommodate an increased demand for services in recent months.

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

**AMENDMENT**

The following data is from law enforcement partners working in Lake County for 2022. There were a total of 4,854 reported incidents of domestic battery, stalking or sexual assault. Domestic battery accounted for 4,300 incidents, stalking accounted for 350, and sexual assault accounted for 519 incidents. A total of 847 cases were charged and brought to prosecution.

According to the Indiana Coalition to End Sexual Assault & Human Trafficking, one in three Indiana women and one in seventy-one men will be raped at some point in their lifetime. In 8 out of 10 cases of rape, the victim knew the person who sexually assaulted them. One in 10 women have been raped by an intimate partner in their lifetime.

There are social inequalities that result in people of color having increased risk factors related to victimization. The more risk factors a person has, the greater the risk for Violence including domestic violence, sexual violence, dating violence, stalking and human trafficking. (Centers for Disease Control and Prevention [CDC], 2016). People of color are reportedly more likely to experience barriers to accessing safe housing, adequate

employment, and medical treatment. According to a report from the National Sexual Violence Resource Center, “Over half (53%) of all [African American] study participants indicated rape, and 44% reported sexual coercion within their lifetime, with approximately 42% reporting both.”

Female college students ages 18-24 are three times more likely than women in the general population to experience sexual violence. With 10 colleges and universities located in the Lake County area and an additional 40 in proximity serving a total student population of 776,924, the estimated number of sexual assaults on campus is high.

The City reviewed police reports and arrests for the period of January 2022 to June 2023. Over that period of time, the following was reported:

- 50 reports of domestic violence with a weapon were reported, which led to 18 arrests;
- 21 reports of domestic battery, leading to 13 arrests; and
- 39 reports of stalking, leading to 3 arrests.

#### **Other Populations**

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

HUD guidance includes a number of households under its definition of Other Populations. Specifically, these households include formerly homeless households who may need additional assistance to avoid a return to homelessness; extremely-low income households (earning less than 30% of the area median income) that experience a severe cost burden (i.e. pays more than 50% of monthly household income toward housing); and extremely-low and low-income households (earning less than 50% of the area median income) that also meet one of the qualifications of “at-risk of homelessness”.

There is most certainly some overlap between this qualifying population and households that also meet the definition of at-risk of homelessness. However, this category also includes households earning between 30 and 50% of area median income. According to the most recent CHAS data set, there are an additional 390 households in this income range that have a severe cost burden.

During the consultation, some service providers expressed a greater need to provide wrap-around services for formerly homeless households to prevent a return to homelessness. Many of the organizations consulted expressed a need for long-term supportive services. Specifically, employment-related services including job training, child care, and transportation were mentioned.

**Current Resources**

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.

Programs and projects directly funded by the City include the ESG-funded rehousing and prevention program and the HOME-funded Tenant-Based Rental Assistance (TBRA) program. The City also supports two shelters located in Hammond with ESG funds and supports case management and other social service programs for at-risk populations.

The City of Hammond is included in Region 1a of the Indiana Balance of State Continuum of Care. As such, the City participates and coordinates with service providers outside its jurisdiction to meet the needs of its residents experiencing homelessness and at-risk of homelessness. The table below includes a summary of the various shelters, services, and permanent supportive housing available to Hammond qualifying populations.

<b><u>Emergency Shelters</u></b>	<b><u>Permanent Supportive Housing</u></b>
Brother’s Keeper	City of Gary – VASH
City Rescue Mission	Edgewater – Phoenix
Crisis Center, Inc.	Edgewater – SPC
Edgewater	Missionaries of Charity – Sojourner Truth
Haven House	Missionaries of Charity – Village of Hope
Innermission	Porter Starke – South Shore Commons
Rebuilding the Bridge	Preservation Housing – Veterans
Missionaries of Charity	Regional Mental Health – Shelby Apt
St Jude House	Regional Mental Health – SPC
Veterans Life Changing Services	Safe Haven Veterans Housing Project
Fair Haven DV	
<b><u>Supportive Services</u></b>	<b><u>Other Voucher Programs</u></b>
Township General Assistance	Hammond Housing Choice Voucher (PHA)
Food Banks (multiple)	East Chicago Choice Voucher (PHA)
Health Clinics (multiple)	Gary Choice Voucher (PHA)
	ICHDA Choice Voucher (PHA)
<b><u>Rapid Re-Housing / Tenant Based Assistance</u></b>	
CoC – ESG Rehousing	
CoC – Gary Rehousing	
CoC – HUD Rehousing	
Edgewater – ESG CV	
Hammond ESG Rehousing	
Hammond TBRA	

### **Unmet Needs**

Describe the unmet housing and service needs of qualifying populations.

Overall, the level of need for the City's four qualifying populations far surpasses the resources available needed to provide adequate shelter and supportive services. As the local housing market and economy transition away from the COVID pandemic, at-risk residents are seeing increased costs associated with housing and everyday living expenses. Housing costs are being driven higher by limited availability while living expenses such as food and transportation are being driven higher by inflation. Below is a summary of the unmet housing and service needs specific to the four qualifying populations based on information gathered through the consultation process and a review of available data sets such as the Continuum of Care Point in Time Count, Housing Inventory, Census Data, and HUD data sets.

### **Sheltered and Unsheltered Homeless Populations as defined in 24 CFR 91.5**

According to the Point in Time Count for Region 1a, most of those reported as homeless were living in shelters and not unsheltered. There were 48 unsheltered adult only households and 3 unsheltered family households. Again, it should be emphasized that these numbers only reflect households included in the Point in Time Count. The PiT is a one-night, birds eye view of the homeless families and individuals and potential needs of the specific populations. It is presumed there is a large number of households that were not found through the Point in Time Count, including those households who do not meet the HUD technical definition of homelessness. According to the local Continuum, an additional 14 family units and 39 units for individuals are needed. The additional units are based on the daily needs identified through the Coordinated Entry process used by the local CoC.

In terms of unmet need for services, feedback received through the consultation process included employment, child care, and reliable transportation. These needs were cited multiple times throughout the consultation process with local advocacy groups. Clients assisted through the City funded programs experience similar needs.

Given the cost of housing in the local market, households looking to leave the shelters and secure affordable housing would need to achieve a stable, living wage job or be supported through some level of rental assistance. Job training, child care, and transportation would support beneficiaries in their efforts to achieve a living wage job. Given the geographic size of the county and lack of sufficient public transit, transportation may be the most crucial need. There have cases where job training was available to beneficiaries but they could not access it due to lack of transportation. There is also a tremendous need for housing placement services that will assist clients obtain housing in the private rental market. There have been cases where clients have housing vouchers but cannot find a landlord or property manager to accept them.

Another pressing need in the current housing market is a case management / housing referral service to connect qualifying populations with available units. A number of re-housing programs have reported that the biggest issue they face is finding available units with landlords willing to participate in the program.

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

The chart above identifies 2,220 rental households at or below 30% of income suffer from a severe housing problem. For the purposes of this plan, any household with a housing problem is considered an unmet need and therefore part of the gap between affordable housing supply and demand.

The service needs of those at risk of homeless are not too different than those considered homeless. Securing a living wage job that reduces housing burden and allowing households to save for emergencies is a common need. Reliable transportation options are needed for this population as well. Some beneficiaries who apply for homeless prevention do so because their private vehicle required an expensive repair and they prioritized the car repair over rent payment as without the car they cannot get to work.

**Domestic Violence**

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

As noted above, households fleeing from domestic violence are more likely to have work income than the homeless population in general. However, households fleeing from domestic violence often have children under the age of 18 as well, so there is a stronger need for supportive services focused on children, including child care and after school care.

According to one local domestic violence service provider, sexual violence is a pervasive problem. In 2021, the Fair Haven Rape Crisis Center assisted 314 victims and provided almost 5,000 instances of supportive services through a crisis hotline, counseling, judicial advocacy and other services.

In regard to human trafficking, there is a lack of wrap around services. One provider felt that DV shelters were at capacity and more beds are needed to meet the demands of this population. The DV shelter located in Hammond has used motel vouchers to help with increased demand.

They estimated that roughly half of human trafficking in Indiana occurs in the northwest region of the state, including Lake County. Safe Coalition for Human Rights (SAFECHR), has seen an increase of Human Trafficking in which the victims require a different setting of sheltered needs that are not met in either general shelter or DV shelters. The victims of Human Trafficking require major supportive services, which must include mental health



services, education, job training, and self-sufficiency reinforcement. Human trafficking prey on both adults and children of all ages, backgrounds, and nationalities and is under reported thus need for greater services availability and identified specific shelters for said victims.

Given the above, this qualifying population has a high level of need for additional shelter and wraparound services.

#### **AMENDMENT**

Due to domestic violence, survivors fleeing their abuser and entering our shelter sometimes only have the clothing on their backs. Victims of domestic violence not only experience physical violence, but sometimes also financial abuse which has caused them to not have financial resources of their own, poor credit, and lack of job experience which in turn prevents them from finding safe, affordable housing. Victims of dating violence and stalking should have similar unmet needs to other victims of domestic violence. It is expected their needs should not be as great if their abuser did not have as much control over their housing and finances.

#### **Other Populations**

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

Many of the households that qualify under the “Other Populations” criteria will also qualify under the “At-Risk of Homelessness” category. In addition to the populations already discussed, there are an additional 390 renter households earning between 30 and 50% of the area median income that pay more than half of their income for housing.

In response to the COVID-19 pandemic, more resources for rental and utility assistance were made available for this income segment. As those funding sources have been expended, there are less supports available in the community to assist with rental affordability for this population. Tenant based rental assistance, access to workforce development and additional support connecting people to social services they are eligible for would help to create housing stability for this population. In consultations, social service agencies described the huge benefit of short-term financial assistance to help avoid eviction and homelessness. By preventing the eviction, the household will be able to more easily secure rental housing in the future without the eviction on their record. The time saved by not having to attend court proceedings and secure new living arrangements can be used for employment that will help ensure the household remains stably housed.

This qualifying population also included formerly homeless families who may need additional supports to achieve housing stability. Multiple service providers stated the need

for on-going supports for persons receiving rental assistance, especially households dealing with substance abuse and/or mental illness.

### **Gaps**

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

There are gaps in housing and services for all of the qualifying populations. The biggest need for housing is additional rental housing affordable to households earning less than 50% of area median income. Ideally, this housing would be located close to public transportation or access to employment to lessen the need to rely on car ownership.

A large gap in the current service delivery system is housing placement. There were many reported instances of clients with housing assistance available who could not find housing. Housing placement services is also needed for households with past evictions and criminal records.

Most of the service providers stated a need on-going supportive, wrap-around services to ensure housing stability. These services could be basic services such as budgeting and job training to more specific services to address on-going mental health and substance abuse. The local Continuum of Care believes the current gaps for services to include adequate job training, which leads to livable wages, sufficient and reliable transportation, adequate and affordable childcare, legal services, timely access to SSDI, Medicaid, and Social Security, recovery programs for substance abuse, greater support for those providing services for Youth aging out of Foster Care and services for Human Trafficking victims.

In terms of shelter-based housing, priority needs include operational funding for the shelters as well as sufficient units and beds to meet the needs of families, single adults, and shelters that provide specifically for youth aging of foster care and identified victims of Human Trafficking. According to the local Continuum, an additional 14 family units and 39 units for individuals are needed. The additional units are based on the daily needs identified through the Coordinated Entry process used by the local CoC.

In consultation with the Continuum of Care and the other HOME ARP grantees in the area, coordination of services seems to be a gap in the service delivery system. The geographic size and lack of reliable transportation makes it difficult for service providers throughout the county to coordinate with each other and for beneficiaries to access services that would be otherwise available if not for a lack of transportation. In addition, the lack of a cohesive data system to help communication and coordination is a barrier. In the current market, many service providers have cited the need for more housing referral type services to help clients locate available units with landlords willing to participate in the program.

### **Identifying characteristics of Other 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:

HUD guidance currently defines two criteria for households “At Greatest Risk of Housing Instability”. The first criteria includes extremely-low income households (earning less than 30% of the area median income) that experience a severe cost burden (i.e. pays more than 50% of monthly household income toward housing). The second criteria include extremely-low and low-income households (earning less than 50% of the area median income) and meets one of the qualifications of “at-risk of homelessness” or otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.

During the consultation process, agencies indicated a relatively higher risk of instability for a number of populations, including those with past evictions, past criminal records, and seniors and persons with disabilities on fixed incomes.

### **Priority Needs**

Identify priority needs for qualifying populations.

#### **Homeless Populations**

For homeless populations, priority needs include an increase in affordable housing units to help households transition from shelters to stable rental housing and support services to help ease that transition. Rapid re-housing and tenant based rental assistance would help households secure existing rental housing currently in the private market. However, there is currently a high level of demand for all rental units, which makes it very difficult for persons using government assistance without access to their own car to find and secure an available unit. Supportive services related to housing placement, often provided by a “Housing Navigator”, is in great need.

The development of additional housing options, including permanent supportive housing, is also needed to provide long term housing solutions for chronically homeless populations that will need on-going supportive services to remain in stable housing.

#### **At-risk of Homelessness**

For extremely-low income households, priority needs include the creation of additional rental units affordable to families with less than 30% of area median income. Ideally, new units will be located in areas of opportunity that provide relatively high levels to employment and/or public transportation. Priorities for supportive services are focused on those that help households secure living wage jobs, including job training, child care, and transportation services.

**Victims of Domestic Violence**

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

**AMENDMENT**

Due to domestic violence, survivors fleeing their abuser and entering our shelter sometimes only have the clothing on their backs. Victims of domestic violence not only experience physical violence, but sometimes also financial abuse which has caused them to not have financial resources of their own, poor credit, and lack of job experience which in turn prevents them from finding safe, affordable housing. Victims of dating violence and stalking should have similar unmet needs to other victims of domestic violence. It is expected their needs should not be as great if their abuser did not have as much control over their housing and finances.

**Other Qualifying Populations**

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

**Determination of Needs**

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

The City used information gathered from the consultation process as the basis for determining the level of need and gaps in the current housing inventory and service delivery system. The City gave additional weight to the service providers who operate in the City and focus on City residents, including Hammond Housing Authority, Greater Hammond Community Services, School City, Innermission, Haven House, and We Care From the Heart. The City also relied on the consultation provided by the Continuum of Care and its members. The City also relied on the data from its current Consolidated Plan, data from the Continuum of Care, and the most recent Census data from the American Community Survey 5 Year estimates.

## **HOME-ARP Activities**

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### **Project Selection Process**

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

Once the Allocation Plan is approved, the City will conduct a Request for Proposals (RFP) from local service providers to administer programs and projects that address the priority needs outlined in the Allocation Plan for qualifying populations. The City will create an application for developers interested using HOME-ARP funds for the development of affordable housing for qualifying populations.

### **City-Administered Projects**

Describe whether the PJ will administer eligible activities directly:

The City does not expect to administer any of the HOME-ARP projects directly. The City may use a portion of the HOME-ARP funds for administration purposes to support the planning and reporting requirements associated with the funding.

### **Pre-Award Activities**

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 worked closely with a number of local service providers through the consultation process in order to develop the HOME ARP Allocation Plan, including the local Continuum of Care. The City also used the services of a grants management consultant, Usona Development LLC, to draft the plan. However, no HOME-ARP funds were used for the development of the plan. None of the local service providers were reimbursed or paid for their contribution to the allocation plan. The grants management consultant was paid for using an existing contract funded from Community Development Block Grant (CDBG) funds.

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

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	523,753	35%	
Non-Congregate Shelters	0	--	
Tenant Based Rental Assistance (TBRA)	400,000	22.5%	
Affordable Rental Housing	400,000	22.5%	
Non-Profit Operating	88,250	5%	5%
Non-Profit Capacity Building	88,250	5%	5%
Administration and Planning	176,500	10%	15%
<b>Total HOME ARP Allocation</b>	<b>1,765,004</b>		

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

In the consultation process, the primary need conveyed was to increase the availability of units accessible to persons experiencing homelessness and at risk of homelessness. To ensure clients who obtain housing have an increased chance of success in obtaining stable, permanent housing, the housing must be paired with wrap-around services.

The City feels a portion of the funding that can be used to prevent homelessness in the first place provides additional benefits of avoiding eviction and preventing additional persons from entering the system of care. This assistance can be funded from the Supportive Services line item.

The City has set aside a portion of funding to help build the capacity and support non-profits that will play an important role in administering these programs. A portion of the funding will be used to cover the administrative and reporting costs associated with the program, which is expected to cover up to five years of programming.

**Rationale for Funding Decisions**

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

The general consensus among the agencies involved in the consultation process indicated that a lack of affordable housing was the largest gap in the current service delivery system. The CoC stated there is a small gap of shelter beds currently needed. The City is choosing to fund the development of rental housing and TBRA instead of non-congregate shelter as it is hoped that by providing more of these resources, the demand for shelter space will go down.

During the consultation process, a recurring theme was a need to increase housing placement services and on-going case management to ensure clients can achieve greater housing stability.

### HOME-ARP Production Housing Goals

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

The City proposes to fund a combination of affordable rental units, tenant-based rental assistance, and supportive services. The overall HOME-ARP housing goal includes 33 rehousing units through tenant-based rental assistance, 4 units of new affordable rental housing units, and 90 units of supportive services and case management.

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 estimates the acquisition and development of four units of new affordable rental housing units. This number is based on an assumed HOME-ARP subsidy of \$100,000 per unit for the initial acquisition. The City will need to work with its non-profit partners to leverage additional funding in order to make affordable rental development feasible for qualifying populations. Ideally, the City and/or its partners can secure ongoing rental support through project-based vouchers.

The City estimates it can assist 33 households through tenant-based rental assistance. Tenant-based rental assistance will be provided to clients who have an expectation to be able to transition to self-sufficiency within two years. For the purpose of this plan, self-sufficiency refers to housing stability without the need for rental assistance.

Commented [WK2]: Assumptions:  
TBRA: A maximum amount of rental assistance of \$12,000 per household.  
Rental Housing: \$100,000 average investment per unit.  
Long-term case management and supportive services: an average of \$6,600

## Preferences

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

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

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

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

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

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



civil rights laws and requirements when establishing preferences or methods of prioritization.

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

#### **Identified 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 provide a preference amongst any of the qualified populations.

#### **Rationale for Preferences**

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. The City will not provide a preference amongst any of the qualified populations.

## Referral Methods

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

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

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

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

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

## Identified Referral Methods

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

The City plans on using multiple referral methods in order to accommodate all of the qualifying populations. ARP-funded projects will use a waiting list to receive referrals from the local Continuum coordinated entry process and other referral agencies. Applicants will be considered for placement based on the chronological order that they were added to the waiting list.

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 Continuum of Care will serve as one of the sources of referral for HOME-ARP funded projects. It is expected that the Continuum of Care will continue to use its existing coordinated entry (CE) process to refer client who are literally homeless or actively fleeing domestic violence. Other sources of referral will include HOME-ARP funded subrecipients who do not participate in the CE process, including other populations where providing assistance would prevent homelessness.

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

HOME-ARP funded projects will receive referrals from the CE process. Currently the CE process gives priority to households that receive the highest scores on the intake assessment.

***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.***

No preference or prioritization will be given to specific referral sources. Each HOME-ARP-funded project will utilize its own waiting list that will receive referrals from multiple sources, including the CE. Referrals will be required to be processed in chronological order.

## Limitations

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

## Project 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 fund projects that limit eligibility for any HOME-ARP funded rental housing or NCS project to a specific qualifying population. All funded projects will comply all applicable fair housing, civil rights, and nondiscrimination requirements.

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:

The City does not intend to fund projects that limit eligibility for any HOME-ARP funded rental housing or NCS project to a specific qualifying population. All funded projects will comply all applicable fair housing, civil rights, and nondiscrimination requirements.

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):

The City does not intend to fund projects that limit eligibility for any HOME-ARP funded rental housing or NCS project to a specific qualifying population. All funded projects will comply all applicable fair housing, civil rights, and nondiscrimination requirements.

## **HOME-ARP Refinancing Guidelines**

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity.***  
Not applicable. The City does not intend to refinance existing debt using HOME-ARP funds.
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***  
Not applicable. The City does not intend to refinance existing debt using HOME-ARP funds.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***  
Not applicable. The City does not intend to refinance existing debt using HOME-ARP funds.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***  
Not applicable. The City does not intend to refinance existing debt using HOME-ARP funds.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***  
Not applicable. The City does not intend to refinance existing debt using HOME-ARP funds.
- ***Other requirements in the PJ's guidelines, if applicable:***  
Not applicable. The City does not intend to refinance existing debt using HOME-ARP funds.