



**Hillsborough
County Florida**

**HOME Investment Partnerships
American Rescue Plan (HOME-ARP)
Allocation Plan**

February 2, 2022

**Affordable Housing Services
601 E. Kennedy Blvd, 24th floor
Tampa, FL 33602**



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Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

The Hillsborough County Department of Affordable Housing Services (AHS) requested input from individuals and agencies including the CoC, its lead agency Tampa Hillsborough Homeless Initiative, and County Departments such as Health and Social Services and Homeless Services.

Additional agencies consulted included Public Housing Authorities serving the jurisdiction and nonprofits providing services to people with disabilities and victims of domestic violence, as well as nonprofits addressing issues concerning Fair Housing, civil rights, housing counseling, and more. AHS administered a survey and consulted directly with these agencies inquiring how best to utilize the funds provided by HOME-ARP. Per the request of the HUD and as directed by the County’s HUD Sr. CPD Representative, the PJ conducted an additional information phase of direct outreach to agencies that provide direct services to veterans and veterans’ groups to solicit additional feedback and comment. This process was documented, and comments were provided to the County’s Sr. CPD Representative.

The County invited citizen participation through advertisement of the HOME-ARP Allocation Plan and public hearing in the local English language Tampa Bay Times newspaper, two minority newspapers, the Florida Sentinel and La Gaceta, and on the County AHS website. Public comment was open for 15 calendar days from January 12, 2022 to February 2, 2022.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Tampa Hillsborough Homeless Initiative	Regional and Neighborhood Organization/services-housing and homeless	Direct Outreach - Survey	This agency serves three qualifying populations, excluding the “Other Populations” sector. They indicated some capacity to obtain additional housing and/or shelter units. They indicated they have the capacity to obtain additional units but could also use capacity building in the form of funding to obtain additional units. The agency estimated a High Need for gaps in housing and High Need for gaps in Service Delivery Systems. They currently collaborate with other agencies and have another agency in mind for future collaborations.
Tampa Housing Authority	Public Housing Authority	Direct Outreach - Survey	This agency serves all four qualifying populations. They indicated little capacity to obtain additional housing and/or shelter units. They indicated need for capacity building in the form of additional staff, training and consultation and emergency housing vouchers. The agency estimated a High Need for gaps in housing and Low Need for gaps in Service Delivery Systems. They currently collaborate with other agencies and would

			like assistance partnering with another agency.
Plant City Housing Authority	Public Housing Authority	Direct Outreach - Survey	No response.
Hillsborough County Homeless Services	Local Government/Services-homeless	Direct Outreach - Survey	This agency serves all four qualifying populations. They indicated strong capacity to obtain additional housing and/or shelter units. They provide Homeless Prevention Services and supportive services to veterans and for transportation. They do not provide housing units or shelter services. The agency defaults to the referring agency to determine the greatest needs of the qualifying populations They currently collaborate with other agencies and would like assistance partnering with another agency for future collaborations.
University Area CDC	Non-Profit/Housing, Services-Children, Education, Employment	Direct Outreach - Survey	This agency serves all four qualifying populations. They indicated strong capacity to obtain additional housing and/or shelter units. They indicated they currently have capacity to obtain additional units, but could use capacity building in the form of funding and additional staff. The agency estimated a High Need for gaps in housing and High Need for gaps in Service Delivery Systems. The estimate housing as the greatest need for the qualifying populations. They currently

			collaborate with other agencies and have another agency in mind for future collaborations.
Rebuilding Together Tampa Bay	Non-Profit/Housing, Services – Children, Housing, Persons with Disabilities, Veterans	Direct Outreach - Survey	This agency serves the “at risk of homelessness” and “Other Populations at risk of housing instability” qualifying population sectors. They indicated strong capacity to obtain additional housing and/or shelter units. They indicated they currently have capacity to obtain additional units. In order to obtain additional units, the agency could also benefit from capacity building in the form of additional staff and training/consultation. The agency estimated a High Need for gaps in housing and Low Need for gaps in Service Delivery Systems. They estimate homeowners 80% and below and home repairs as the greatest needs for the qualifying populations. They also identified financial capacity as a specific need contributing to the gaps in housing. The agency currently collaborates with other agencies and has another agency in mind for future collaborations.
MacDonald Training Center	Non-Profit/ Services – Persons with Disabilities	Direct Outreach - Survey	This agency serves the “At risk of Homelessness” and “Other Populations at risk of housing instability” qualifying population sectors. They do not provide housing units or shelter services. They provide services including housing counseling, development and support of affordable housing, and

			<p>provision of supportive services for education, employment, and persons with disabilities. The agency estimated a High level of Need for gaps in housing and High level of Need for gaps in Service Delivery Systems. They estimated the greatest need of the Qualifying Population is affordable housing, followed by transportation and provision of supportive services for employment. They currently collaborate with other agencies and would like assistance partnering with another agency for future collaborations.</p>
<p>Sunrise Community Inc</p>	<p>Non-Profit/Services- Persons with Disabilities</p>	<p>Direct Outreach - Survey</p>	<p>This agency serves the “Other Populations at risk of housing instability” qualifying population with the provision of supportive services for Persons with Disabilities. They do not provide housing units or shelter services. The agency estimated gaps in housing includes funding for ADA home renovations and gaps in Service Delivery Systems include funding to assist residents without benefits for Adult Training program services. They currently collaborate with other agencies and would like assistance partnering with another agency for future collaborations.</p>

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Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
ECHO	Non-Profit/Homeless Prevention Services, Housing Counseling, Development of Shelter Units, Services-Children, Elderly, Education, Meals, Financial Counseling, Employment, LMI, Migrant Farmworkers	Direct Outreach - Survey	This agency serves all four qualifying population sectors. They indicated little capacity to obtain additional housing and/or shelter units. They indicated they currently have capacity to obtain additional units. In order to obtain additional units, the agency could benefit from capacity building in the form of funding, additional staff, and training/consultation. The agency estimated a High Need for gaps in housing and High Need for gaps in Service Delivery Systems. The estimate immediate shelter as the greatest need for the qualifying populations, followed by housing vouchers and permanent affordable housing. Specific estimated needs for the gaps in housing include lack of affordable housing. Specific estimated needs for the gaps in service delivery systems include the lack of shelter for families with children. The agency currently collaborates with other agencies and have another agency in mind for future collaborations.
Various Service Providers	Non-Profit/Service Providers	Direct Outreach - Survey	Nine survey responses were submitted by Service Providers without providing an agency name. Overall, the responses strongly indicate there is a high level of need for development of affordable housing units. There were mixed responses regarding level of need for service delivery, indicating a moderate-to-high level of need. Many of the anonymous responses indicated that the agency does not provide

			housing units or shelter services. All but one respondent indicated their agency currently collaborates with other agencies and is interested in future collaboration.
Tampa Crossroads	Non-Profit/Services - Veterans, Homeless Prevention, Employment, Fair Housing, Health, Housing, Low/Moderate Income Persons, Legal Services, Persons with Disabilities	Direct Outreach – Survey	This agency serves the Homeless, At risk of Homelessness, and “Other Populations at risk of housing instability” qualifying population with the provision of supportive services for Veterans. The agency provides supportive services for veterans families (SSVF) through their Veterans Assistance Center, which helps homeless Veterans move into permanent housing and helps Veterans at risk of becoming homeless to obtain stable housing. According to the services listed on their website, the agency provides housing units and shelter services. The three greatest needs of the population this agency serves include availability of affordable housing, ancillary needs such as moving expenses or storage, and support/encouragement to secure and maintain employment. The agency estimated a high level of need for gaps in housing and service delivery systems. The agency stated specific needs contributing to gaps in housing includes housing costs are incredibly high and gaps in Service Delivery Systems include many services are available in the community, but not service providers all are aware of each other. The agency currently collaborates with other agencies serving the Qualifying Population and have another agency for future collaborations.

<p>Hillsborough County Department of Consumer and Veterans Services</p>	<p>Local Government/Services - Veterans</p>	<p>Direct Outreach – Survey</p>	<p>This Hillsborough County Department serves the Homeless, At risk of Homelessness, and “Other Populations at risk of housing instability” qualifying population with the provision of supportive services for Veterans. The County’s Veterans Services assists Veterans, their dependents and survivors in accessing federal, state and local benefits; acting as a single point of contact for military members and their families seeking assistance with outside agencies. Staff also provides outreach and support to Veterans in assisted-living facilities and nursing homes. The department does not directly provide housing units and shelter services. The three greatest needs of the population served by this department include employment, VA benefits, and housing. The agency indicated unknown for level of need for gaps in housing and service delivery systems. The agency currently collaborates with other agencies serving the Qualifying Population and would like assistance partnering with another agency for future collaborations</p>
<p>Liberty Manor for Veterans Inc.</p>	<p>Non-Profit/Services – Veterans, Elderly, Fair Housing, Meals or Groceries, Housing, Low/Moderate Income Persons, Persons with Disabilities</p>	<p>Direct Outreach – Survey</p>	<p>This agency serves the Homeless and “Other Populations at risk of housing instability” qualifying population with the provision of supportive services for Veterans. The agency is currently providing housing units and/or shelter units. The agency reported strong capacity to provide additional housing units or shelter units. They also requested capacity building support in the form of funding to obtain additional units. The agency indicated the three greatest needs of</p>

			<p>the Qualifying Population they serve are housing, food, and transportation. The agency estimated a high level of need for gaps in housing and service delivery systems. The agency stated specific needs contributing to gaps in housing includes lack of collaboration with housing providers and resident legal issues related to evictions. The agency currently collaborates with the VA to serve veterans in the Qualifying Population and is uncertain if interested in collaborating with another agency.</p>
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Public Participation

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

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

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

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

- ***Public comment period: start date – 1/12/2022 end date – 2/02/2022***
- ***Public hearing: 2/02/2022***

Summary of comments: No public comments received.

Describe any efforts to broaden public participation:

Efforts to broaden public participation included advertisement of the public comment period and public hearing in the minority newspapers in Spanish to engage with the Limited English Proficiency (LEP) population. Additionally, the draft HOME-ARP Allocation Plan was made available on the Hillsborough County Affordable Housing Services website for public review.

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

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

No public comments or recommendations were received through the public participation process.

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

There were no comments or recommendations not accepted.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

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OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	474	116	417	417	40								
Transitional Housing	37	9	88	88	24								
Permanent Supportive Housing	389	105	1138	1138	1095								
Other Permanent Housing						96	148	11	36				
Sheltered Homeless						127	469	134	137				
Unsheltered Homeless						2	589	47	19				
Current Gap										675	5	437	437

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

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	347,261		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	3,653		
Rental Units Affordable to HH at 50% AMI (Other Populations)	12,876		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		27,620	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		18,635	
Current Gaps			29,726

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

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

Qualifying populations within the County include persons experiencing homelessness, households at risk of homelessness, persons fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; and other populations. Other populations include very low income households at or below 30% AMI (at-risk of homelessness), households requiring services or housing assistance to prevent homelessness, households with income between 30-50% AMI experiencing one or more severe housing problems, and veterans and families that include a veteran family member that meet the one of other criteria described.

Homeless Needs Inventory and Gap Analysis data was gathered from the Continuum of Care Housing Inventory County (HIC) and Point in Time Count (PIT). The CoC noted the pandemic prevented an unsheltered PIT Count in 2021. At the time of the 2020 Point in Time Count, there were a total of 1,431 individual persons experiencing homelessness within the FL-501 Tampa/Hillsborough CoC region. Of the 1,431 individuals experiencing homelessness, 840 individuals (53.7%) were residing in a sheltered location and 591 individuals (41.3%) remained unsheltered. Persons identifying as White and Black/African American are represented at similar rates within the crisis response system, as identified during the 2020 PIT Count.

Person fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, as defined by HUD, are also a sector of qualifying population. At the time of the 2020 Point in Time Count, 192 persons experiencing homelessness identified were also victims of domestic violence.

The at-risk of homelessness sector of Qualifying Populations is defined in 24 CFR 91.5. Characteristics attributed to housing instability and increased risk of homelessness include: having a household income between 0-30% AMI, experiencing severe housing cost burden, a person with a disability living along on a fixed income, household members with physical disabilities and other chronic health issues, poor credit and/or no credit history, and households with a family member who has a record of criminal history. The Housing Needs Inventory and Gap Analysis identified 27,620 renter households within the County experiencing one or more severe housing problems with very low income at or below 30% AMI. Households within the 0- 30% AMI income category are most impacted by severe cost burden. Other renter households, Elderly owner households, and Small Related owner households are the household types most impacted by housing severe cost burden. Renters are disproportionately affected by severe cost burden in Hillsborough County. Approximately 73% of Hispanic households and 72% of Black/African American households at the below 30% AMI income level have at least one of the four severe housing problems, which is a rate higher than the jurisdiction as a whole.

Additionally, there are 2,695 renter and 2,158 owner households, totaling 4,853 households, with zero/negative income meaning that they cannot be cost burdened but may still require housing assistance. These households are a qualifying population at-risk of homelessness. The Housing Needs Inventory also identified 18,635 renter households with income between 30-50% AMI

experiencing one or more severe housing problems. There are two racial or ethnic groups at the 30-50% AMI income level with a disproportionate housing need: 100% of Pacific Islander households and 62% of Black/African American households. The households at this income level experiencing severe cost burden also qualify as “other populations”. The 2021 Five-Year Consolidated Plan identified elderly households at greatest risk, as documented by 2017 CHAS data on high and severe levels of cost burden. It is difficult to estimate the number of families with a disabling condition in need of housing assistance. However, data on households that live below the poverty level and households that qualify for other assistance programs may be indicative of the need for housing assistance. 28,427 households in Hillsborough County receive Supplemental Security Income (SSI) benefits.

Veterans and families that include a veteran family member that meet the criteria for one of the qualifying populations described as at Greatest Risk of housing instability are eligible to receive HOME-ARP assistance. At the time of the 2020 PIT Count, 195 persons experiencing homelessness identified were also Veterans and Families that include a Veteran Family Member. The 195 persons in this population meet the additional qualifying population criteria of homelessness and therefore are eligible to receive assistance through HOME-ARP.

Based on the Housing and Homeless Needs Inventory data, the total Qualifying Populations, which is composed of the homeless population, households at risk of homelessness (0-30% AMI), and other populations needing assistance to achieve housing stability such as households with an income between 30-50% AMI who are experiencing one or more severe housing problems, is 47,686 households.

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

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

The unmet housing and service needs of qualifying populations include but are not limited to availability of non-congregate shelter (NCS) units, provision of supportive services, and availability of affordable rental housing units. Supportive services are needed to help transition households into safe and sustainable housing. Supportive services can take the form of housing counseling, financial assistance, financial counseling, Tenant Based Rental Assistance (TBRA) and employment services.

Sheltered and unsheltered homeless populations need access to non-congregate shelter (NCS) units. Overall, 42.1% of persons experiencing homelessness reside in an unsheltered location. Additionally, 308 persons experiencing homelessness disclosed having a Severe Mental Illness (SMI). Of these persons, five persons with SMI were residing at Safe Haven, 145 persons with SMI

were sheltered at Emergency Shelter, 33 in Transitional Housing, and 125 remained unsheltered. There were 162 persons who self-disclosed having substance abuse disorder diagnosis, of whom 108 were located at Emergency Shelter, five in Transitional Housing, 5 residing in Safe Haven, and 25 individuals remained at an unsheltered location. There were 16 individuals experiencing homelessness who self-disclosed being a person with an HIV/AIDS diagnosis and six persons remained in Emergency Shelter, five in Transitional Housing, and five staying in an unsheltered location at the time of the Count. An increase in shelter units would address the unmet need of 42.1% of persons experiencing unsheltered homelessness.

Additionally, there is an unmet need for supportive services. Within the sheltered and unsheltered homeless population, 308 persons disclosed having a Severe Mental Illness (SMI). Additionally, 16 persons experiencing homelessness disclosed being a person with HIV/AIDS diagnosis. Furthermore, 75 persons experiencing homelessness were also Victims of Domestic Violence. Of the 75 Victims of Domestic Violence experiencing homelessness, 48 persons were staying at an Emergency shelter, 8 persons were staying in Transitional Housing, and 19 persons were staying in an unsheltered location. These persons would benefit from both emergency shelter units and supportive services.

The unmet needs for the populations at risk of homelessness include resources for rental or utility deposit assistance and development of affordable rental housing units. The housing problems affecting most renters and homeowners in Hillsborough County are housing cost burden and severe cost burden. Elderly households are at greatest risk of experiencing cost burden. These households living in Hillsborough County require access to financial support to obtain and maintain housing. Additionally, an increased stock of available and affordable housing units would alleviate this unmet need. Other resources such as supportive services for economic development, housing counseling, and workforce development training or employment opportunities that would increase household income could also address the unmet housing needs of the qualifying population.

Other Populations that qualify include those at risk of housing instability or in unstable housing situations. The populations at greater risk of housing instability or in unstable housing situations due to limited income and high service needs to support independent living are elderly, persons with disabilities, persons reporting substance abuse, and victims of domestic violence.

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:

Current resources available to assist the unmet housing and service needs of qualifying populations include but are not limited to affordable housing rental units, supportive services, rent and utility deposit assistance, and employment opportunities.

The Tampa/Hillsborough Continuum of Care (CoC) led by the Tampa Hillsborough Homeless Initiative (THHI), works with Hillsborough County to address the needs of at-risk households and

households experiencing homelessness. The streamlined assessment tool, the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT) offers a consistent way to evaluate each person experiencing a housing crisis, linking them to timely services and completing referrals to housing programs intended to stabilize their living situation. Working in collaboration with various systems of care to identify, assess, and refer persons experiencing homelessness to the CoC, THHI and the network of direct service organizations provide targeted services and supports through the housing crisis response system and employ specific interventions based on the status of homelessness, as defined by HUD.

For persons still housed and at-risk of losing their housing, homeless prevention assistance is available through Hillsborough County Community Resource Centers. There are five Community Resource Centers in Hillsborough County: Lee Davis Community Resource Center, Plant City Community Resource Center, SouthShore Community Resource Center, University Community Resource Center, and West Tampa Community Resource Center. The THHI homeless prevention services aim to prevent people from becoming literally homeless and may include financial assistance for rent, mortgage, or utilities, case management, assistance with budgeting, and financial counseling to prevent homelessness. If the household is evicted, the CoC may divert the individual using best practices, mediation services, financial assistance, budgeting/financial counseling, and identifying other temporary housing resources such as friends or family to prevent entrance into the housing crisis response system.

Households that are fleeing from domestic violence can access shelter and counseling services to support their housing needs, and referrals to CoC-funded permanent housing projects. Survivors of domestic violence are linked to SAMH services, as needed, in addition to counseling services. Households at-risk of homelessness due to limited income, especially those whose income is at or below 30% AMI, may be eligible for time-limited financial assistance. This offers the household an opportunity to stabilize their housing situation through community supports and increasing financial stability to prevent future episodes of homelessness. Households with insufficient resources to attain housing stability, such as lacking resources for rental or utility deposits, may seek resources through their service provider to help with financial assistance.

Support services such as budgeting may also be provided. When a person is transitioning out of an institutional care setting and into community integrated, independent living, discharge planning to Certified Recovery Residences, transitional housing programs, or independent living options with or without housing subsidies that offer community-based supports are integral to obtaining and maintaining housing.

Households participating in THHI's Rapid Rehousing (RRH) programs can receive supports to achieve educational and employment goals to ensure that, upon exit from the time-limited program, the household income is substantial enough to continue supporting the housing expenses. Increased economic independence will prevent future episodes of homelessness, as the household can maintain the lease agreement. While the RRH strategy incorporates support services, the case manager tasked with providing housing stabilization supports, it is also necessary to link the participant to on-going services that will enhance their ability to maintain their housing.

During the upcoming 2021-2025 five-year Consolidated Plan, Hillsborough County aims to

address affordable housing needs that target households comprised of families, elderly, persons with disabilities, homeless persons or persons at-risk of becoming homeless, and persons with special needs.

The Local Housing Assistance Plan (LHAP) outlines the strategy for the State Housing Incentive Partnership (SHIP) program, passing through state HTF dollars to Hillsborough County for rental and homeownership activities aimed at extremely low, very low, low, and sometimes moderate-income residents. Eligible activities through the SHIP program include:

- Owner-occupied rehabilitation
- Purchase assistance
- Special needs owner occupied rehabilitation
- Special needs rental housing
- Disaster relief
- Homeowner disaster repair
- Foreclosure prevention
- Rental disaster direct assistance
- Multifamily Rental Housing Development
- Rehabilitation Single-family owner-occupied, demolition and reconstruction

Detailed in the Hillsborough County LHAP, the jurisdiction aims to serve 210 owner-occupied units under homeownership, 6 units within rental development projects, and 32 residents with rental assistance during 2019-2022.

Additionally, resources are available to the Qualifying Populations through a special allocation to prevent and respond to the spread of COVID-19. Qualifying Populations are disproportionately impacted by COVID-19. Hillsborough County received \$9,914,421 as a Community Development Block Grant CARES Act (CDBG-CV) grantee and \$8,184,556 as an Emergency Solutions Grant CARES Act (ESG-CV) grantee. The funds are used to administer public services including rental and mortgage assistance housing counseling, mental health services, and education services. Additionally, the funds are used for public facilities renovation activities. The ESG-CV funds support resources including emergency shelter operations, homelessness prevention and diversion, and rapid rehousing. These resources are available through partnership with the lead CoC – THHI. The jurisdiction aims to serve 2,050 individuals with 5 public service activities, provide improvements to a public facility, and renovate 28 housing units with these funds. Additionally, rental and mortgage assistance is available for up to 336 households through activities administered by Catholic Charities Diocese of St. Petersburg, REACH, Greater Palm River Point CDC, and Housing and Education Alliance, Inc. The rental and mortgage assistance aim to assist 89 households with an income below 30% AMI, 143 households with an income of

31-50% AMI, and 104 households with an income of 51-80% AMI who may face eviction or homelessness without this resource. The number of households assisted by agency and program are listed below:

- Catholic Charities, Diocese of St. Petersburg - Pathways Hillsborough COVID Financial Assistance (151 households)
- Greater Palm River Point CDC – Short Term Rental/Mortgage Assistance and Related Housing (50 households)
- Real Estate Education and Community Housing, Inc. (REACH) – Rental, Mortgage and Housing Counseling Assistance (135 households)
- Housing and Education Alliance, Inc. – Short Term Rental/Mortgage Assistance (395 households)

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

The current Homeless Needs Inventory and Gap Analysis data gathered from the 2021 Continuum of Care Housing Inventory Count (HIC) shows there is a need to continue to invest in shelter and housing for the homeless population to maintain level of service. Although the pandemic prevented a Point in Time Count in 2021, the HIC identified 589 unsheltered homeless adults without children. Additionally, two family households with children were identified as unsheltered homeless. The current Homeless Needs Inventory Gap Analysis shows a surplus of 675 Family beds in emergency shelter, transitional housing, and other permanent supportive housing compared to homeless population of Family households with at least 1 child. The majority of the beds are the 474 beds in 116 units of emergency shelter, followed by 389 beds in 105 units of permanent supportive housing and 37 beds in 9 units of transitional housing.

However, despite a surplus of 675 beds, the Gap Analysis also noted that there is only a surplus of 5 units for homeless family households with at least 1 child. The Homeless Needs Inventory Gap analysis also shows that there is a surplus of 437 beds and 437 units in emergency shelter, transitional housing, and permanent supportive housing for the adult households without child population. The majority of these beds and units are the 1,138 beds and units of permanent supportive housing, followed by 417 beds and units of emergency shelter and 88 beds and units of transitional housing. As shown by the number of persons experiencing homelessness, the shelter bed inventory could meet the needs of the population in the jurisdiction. However, there are other factors contributing to homelessness beyond shelter bed capacity.

Additionally, there are 1,046 persons in households without children experiencing homelessness and these individuals need either zero- or one-bedroom units to end their homeless episode. However, zero bedrooms account for 3.4% and one-bedrooms account for 22.2% of rental housing units in the jurisdiction. Therefore, the demand surpasses the supply of this housing unit type.

According to the University of Florida Shimberg Center for Housing Studies, within Hillsborough

County there are 167 properties totaling 21,415 assisted units that are funded by Florida Housing Finance Corporation, HUD Multifamily, USDA Rural Development, Local Housing Finance Authority, and HUD Public Housing. CDBG, HOME, and State Housing Initiative Partnership (SHIP) dollars are allocated to activities that improve and increase the housing stock for low to moderate income residents. Hillsborough County needs to expand the housing stock of affordable and available units to households of various income ranges.

Households at or below 50% AMI are most impacted by cost burden and the gap in affordable housing options. The County and its residents will benefit from investment in activities that will create new homes for homeownership and support rental assistance and the creation of rental units for households maintaining lower income. The demand for housing subsidies administered through PHAs exceeds supply, and with the right supports for existing housing participants that enhance the opportunity for economic mobility, PHA voucher holders can transition from housing subsidy programs to market-rate rentals, allowing for new low-income residents the opportunity to receive the benefit. The jurisdiction needs an additional 825 rental units per year to address the current cost burden gap. Homebuyer assistance and housing subsidies remain limited, creating barriers for housing choice among a substantial majority of residents within the jurisdiction who cannot achieve homeownership and rely on the supply of housing affordable to their income.

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

Characteristics shared by the populations at greater risk of housing instability or an increased risk of homeless defined by “other populations” include limited income and high service needs to support independent living. This population includes elderly, persons with disabilities, persons reporting substance abuse, and victims of domestic violence. Characteristics attributed to housing instability and increased risk of homelessness include having a household income between 0-30% AMI, experiencing severe housing cost burden, a person with a disability living alone on a fixed income, household members with physical disabilities and other chronic health issues, poor credit and/or no credit history, and households with a member who have a record of criminal history.

Identify priority needs for qualifying populations:

The priority needs for the qualifying populations are acquisition and development of non-congregate shelters, Tenant Based Rental Assistance (TBRA), and development of affordable rental housing. Community integrated housing opportunities are essential for persons with special needs. Implementation of best practices, specific to that person’s individual needs, is essential to a person’s stability, recovery, and ability to maintain independent living. The most vulnerable community members often overlap between multiple service systems and their needs should be consumer-identified and supported through a multi-disciplinary approach to help a person achieve stability and improve their quality of life.

Non-congregate shelters provide units addresses the need for units for the homeless population. A significant portion of the qualifying population experiencing homeless are single adults without children. While a portion of Therefore, the non-congregate shelter units will address the gap in

individual shelter units and increase homeless shelter options for this population. DCF's 2019-2020 Annual Capital Needs Assessment identifies a need for increased emergency shelter and transitional housing capacity to provide services to persons fleeing domestic violence.

The greatest need for populations at-risk of Homelessness with incomes of 30-50% AMI is rental assistance to relieve severe cost burden. Therefore, the PJ identified Tenant Based Rental Assistance (TBRA) as the greatest need for this population. In HOME-ARP TBRA, the PJ assists a qualifying household with payments to cover the entire or insufficient amounts that the qualifying household cannot pay for housing and housing-related costs, such as rental assistance, security deposits, and utility deposits. HOME-ARP TBRA assisted households may choose to rent a unit in a HOME-ARP rental project or any other eligible rental unit. HOME-ARP TBRA is a form of rental assistance that is attached to the household and not a particular rental unit. Therefore, the HOME-ARP TBRA assisted household may choose to move to another unit with continued HOME-ARP TBRA as long as the new unit meets the applicable property standards of this Notice. If a HOME-ARP TBRA assisted household chooses to move, the rental assistance contract terminates and a new rental assistance contract for the new unit will be executed according to HOME-ARP TBRA requirements. The HOME-ARP TBRA assisted household must notify the PJ before moving in order to receive continued HOME-ARP TBRA. The PJ may operate HOME-ARP TBRA itself or may contract with a PHA or other entity with the capacity to operate a rental assistance program.

The largest gap the Qualifying Populations are facing is access to affordable rental housing units. As shown in the Housing Needs Inventory Gap Analysis Tables, there is a deficit of 29,726 housing units available to the Qualifying Populations. Demand also surpasses the supply of zero- and one-bedroom rental units in the jurisdiction. Development of affordable rental housing of this type is needed to transition many individuals out of assisted and/or temporary housing into permanent market-rate housing affordable at their income level.

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

The level of need and gaps in shelter and housing inventory and service delivery systems were determined through the data presented in the Housing Needs Inventory and Gap Analysis Tables, information available in the Consolidated Plan, and direct consultation with homeless, housing and nonprofit service providers. The nonprofit service providers were asked to provide quantitative and open-response qualitative feedback to estimate level of need and gaps in shelter and housing inventory and service delivery systems. Respondents could identify the level of need for housing and service delivery systems as a "high need", "low need", "no need", or "don't know". Keywords from the open-response feedback were identified and noted. Quantitative feedback strongly indicated a high level of need for affordable housing units, where 87.5% of respondents estimated a high level of need for the gap in housing units. The level of need for housing units was estimated to be slightly higher than the level of need for the service delivery system, where 75% of respondents estimated a high level of need and 12.5% of respondents estimated a low level of need. Overall, respondents estimated a moderate-to-high level of need for addressing gaps in the service

delivery system.

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HOME-ARP Activities

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

To promote equity, effectiveness, and transparency in working with resources providing services for Affordable Housing Services (AHS), be they vendors, non-profit partners or grantees, other County departments, other government agencies, auditors, consultants, contract employees, developers, service providers, subrecipients or other resources tasked to assist in accomplishing the work of the AHS, the County will solicit applications following the Request for Proposal policies, regulations, and procedures of the County’s Procurement department. AHS shall follow procurement regulations as specified for Federal and State programs. The PJ may administer eligible activities directly, if needed.

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

Funds were not provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan. A subrecipient or contractor is not responsible for the administration of the County’s entire HOME-ARP grant.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 4,000,000		
Tenant Based Rental Assistance (TBRA)	\$ 3,000,000		
Development of Affordable Rental Housing	\$ 1,818,351.35		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 1,556,179.65	15 %	15%
Total HOME ARP Allocation	\$ 10,374,531.00		

Additional narrative, if applicable:

The feedback received from nonprofit service providers strongly indicated that the greatest need and largest estimated gap for the Qualifying Populations they serve is availability of affordable rental housing units, followed by rental assistance and development of non-congregate shelter units. Affordable Housing Services utilized this feedback to plan the use of HOME-ARP Funding. The PJ prioritized funding activities that contribute to the priority needs, as the Housing Needs Inventory Gap Analysis Tables also supported these priorities for the qualifying populations.

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:

HOME-ARP funds must be used to primarily benefit the qualifying populations through the four eligible activities: TBRA, development and support of affordable housing, provision of supportive services, and acquisition and development of non-congregate shelter (NCS) units. The characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis demonstrated the greatest needs are TBRA, development of affordable rental housing units, and acquisition and development of non-congregate shelter units. Use of HOME-ARP funds for these activities will close the gap of a deficit of 29,726 affordable rental units needed to serve the Qualifying Populations. The development of affordable rental housing addresses and targets characteristics associated with housing instability and supports households at-risk of homelessness. The TBRA will assist households with incomes below 50% AMI relieve severe cost burden, while attaining permanently affordable housing at their income level. Additionally, acquisition and development of non-congregate shelter units will address the need for units for the adults without children experiencing homelessness. The NCS units are one or more buildings that provide private units or rooms as temporary shelter to individuals and families and does not require occupants to sign a lease or occupancy agreement. The Housing Needs Inventory and Gap Analysis table supports the rationale that the largest portion of the homeless population, both sheltered and unsheltered, are single adult households without children. The NCS units will address the needs of this sector of the qualifying population.

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 PJ estimates it will produce or support the development of 50-100 affordable rental housing units for qualifying populations, with a maximum subsidy per-unit of \$131,814.00. The maximum per-unit subsidy established in NAHA does not apply to HOME-ARP units. No less than 70% of the affordable rental housing units acquired, rehabilitated or constructed with HOME-ARP funds must be occupied by households in the qualifying populations.

Additionally, the PJ estimates it will support 250 families to obtain housing affordable at their income with TBRA. The PJ will establish policies for the allowable maximum subsidy, which may differ from the maximum subsidy requirements at 24 CFR 92.209(h). PJs may provide up to 100 percent subsidy for rent, security deposit payments, and utility bills. The PJ must also establish

policies for determining any household contribution to rent based on a determination of the qualifying household's income.

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

Hillsborough County will provide HOME-ARP funding to address the housing and service needs of the County's most vulnerable populations and achieve the goal of production and preservation of affordable housing and supportive services. The PJ will increase affordable rental housing to the qualifying populations, including very low income households at or below 30% AMI and households at risk of homelessness with incomes of 30-50% AMI. The goal will address the affordable rental housing unit deficit and relieve the cost burden disproportionately felt by the qualifying populations. It will support the provision of decent housing by increasing the availability and accessibility of affordable housing. The County will address the priority need by funding the acquisition, construction, rehabilitation, and new/reconstruction of ownership and rental affordable housing.

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Preferences

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

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

The PJ does not intend to give preference to one or more qualifying populations or subpopulations.

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

Not applicable as a preference was not identified.

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

Not applicable as a preference was not identified.

HOME-ARP Refinancing Guidelines

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

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

Not applicable as the PJ does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing being rehabilitated with 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 as the PJ does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing being rehabilitated with HOME-ARP funds.

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

Not applicable as the PJ does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing being rehabilitated with HOME-ARP funds.

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

Not applicable as the PJ does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing being rehabilitated with HOME-ARP funds.

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

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

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

Not applicable.

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