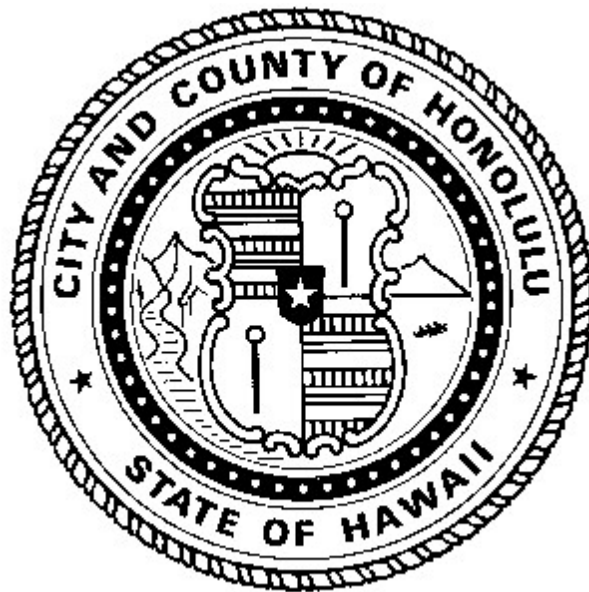


# HOME-ARP ALLOCATION PLAN



Program Year  
2021

Prepared By  
Department of Community Services  
City and County of Honolulu

February 2023

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# HOME-ARP Allocation Plan

**Participating Jurisdiction:** City and County of Honolulu

**Date:** February 21, 2023

## Introduction

The American Rescue Plan Act (ARPA) of 2021 (Public Law No. 117-2) provided over \$1.9 trillion in relief to address the continued impacts of the COVID-19 pandemic on the economy, public health, State and local governments, and individuals and businesses. The American Rescue Plan Act authorized the U.S. Department of Housing and Urban Development (HUD) to allocate HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) funds to States and other participating jurisdictions to support qualifying populations. The City and County of Honolulu (City) is a participating jurisdiction in the HOME-ARP program. The City's geographic jurisdiction includes the island of Oahu.

On September 22, 2021, HUD's Honolulu Field Office transmitted its intent to award the City \$11,120,347 of HOME-ARP funds in Fiscal Year (FY) 2021. Under this Grant Agreement, the City is eligible to incur and expend up to 5% (\$556,017.35) of the total award for administrative and planning costs to develop the City's HOME-ARP Allocation Plan. Up to 15% (\$1,668,052) of the City's total award may support administrative activities.

HOME-ARP must be used to perform activities that primarily benefit qualifying individuals and families who are:

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

Eligible activities for HOME-ARP funds include:

- Development and support of affordable housing;
- Tenant-based rental assistance (TBRA);
- Provision of supportive services; and
- Acquisition and development of non-congregate shelter units.

The City's HOME-ARP Allocation Plan was developed in partnership with the Continuum of Care, public housing agencies, homeless service providers, and other public and private organizations and individuals that serve qualifying populations within the City's jurisdiction. The City's HOME-ARP Allocation Plan must be approved by HUD prior to funds being released.

## Consultation

### ***Summarize the consultation process.***

To seek input on the City's HOME-ARP Allocation Plan, the City consulted with a range of organizations serving qualifying populations on Oahu, including: Partners in Care (PIC), the Continuum of Care for the City and County of Honolulu; homeless service providers and members of the CoC; domestic violence service providers; veterans service providers; public housing agencies (PHA); public agencies serving qualifying populations; and organizations engaged in fair housing, civil rights, and representation of people with disabilities.

An online survey for service providers and public agencies was available from December 6, 2022 through January 27, 2023. The City circulated notifications about the survey with the Honolulu City Council, the City's social media accounts, and the Continuum of Care membership. Respondents were asked to rank, in order of priority from highest to lowest, the following categories:

- Development and support of affordable housing;
- Tenant-based rental assistance (TBRA);
- Provision of supportive services; and
- Acquisition and development of non-congregate shelter units.

Respondents were also asked to provide feedback on any of the eligible categories.

A summary of feedback from these organizations is provided in Table 1 below. Some responses have been edited for clarity.

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

Agency/ Organization Consulted	Type of Agency/ Organization Consulted	Method of Consultation	Feedback
Partners in Care	Continuum of Care	Online survey, virtual meeting	Traditional congregate shelters are not beneficial. Smaller non-congregate shelters using the Housing First model are more desirable for clients. Investing in developer and service provider partnerships during the housing construction and acquisition phase is important to ensuring that new buildings can be opened immediately. Initiatives that help clients sustain permanent housing, including long-term case management and landlord engagement, are also important. Provider capacity is also critical, as most agencies are under-staffed and existing staff are underpaid for the level of work they are expected to perform.

<b>City and County of Honolulu, Department of Community Services, Community Assistance Division</b>	PHA for the City and County of Honolulu	Phone meeting	Assist voucher holders with housing navigation and landlord incentives. Provide services to help voucher holders develop tenancy skills. Increase affordable rental housing units.
<b>Hawaii Public Housing Authority</b>	PHA for the State of Hawaii	Phone meeting	Possible use toward rental assistance. Rehabilitate or create more affordable rental units. Leverage other funds and offer landlord incentives such as maintenance reimbursements.
<b>Catholic Charities Hawaii</b>	Homeless service provider	Online survey	The City needs more permanent supportive housing providers and options. Provide stable and ongoing funding to providers to provide an array of supportive services (e.g., mental health, substance abuse, housing stability). Funding needs to reflect the true cost of services. Research is needed to identify the expiration of affordable units and strategies to preserve affordable rental housing. Funds could be used for project-based developments. People can obtain housing vouchers, but there is limited supply of rental units available or willing to accept those tenants.
<b>Family Promise of Hawaii</b>	Homeless service provider	Online survey	Support providers in acquiring various empty real estate to be turned into non-congregate shelters. We have been successful through our congregational partnerships, but we are always looking for more spaces. Ensure that affordable rental housing is actually affordable for individuals and families making minimum wage and develop a more efficient process for getting people housed. Many subsidy programs, such as child care and TBRA, have too many barriers in place. Families may not have all the documentation needed to qualify. Aftercare programs should also receive more funding.
<b>Project Vision Hawaii</b>	Homeless service provider	Online survey	Tiny home communities could be great transitional housing options. The City could also identify and lease vacant properties at a nominal rate (\$1/year) and work with the State to lease their agricultural land for the same purpose. Former Governor Lingle's reentry housing ideas are a great method. Additional supportive services needed

			include behavioral health with on-site social workers, preventative health services, and employment opportunities and ways offset rent costs.
<b>Institute for Human Services</b>	Homeless service provider	Online survey	Develop more shelters outside of the main urban areas, such as Wahiawa, North Shore/Upper Windward, and Lower Windward. Homeless households in these areas tend to have high identification with the areas where they were born and raised. These areas often have less support service availability and minimal shelter. Preserve affordable housing inventory and incentivize affordable housing production. HOME funds can be used to repair/maintain existing inventory and add units. Inventory needs to be as near to jobs and public transportation as possible. More vouchers for rental assistance at more income levels are needed, as well as services for people who are working to get job training. Strengthening personnel capacity of providers is key. We are losing our best staff to the healthcare industry due to limited careers prospects and low pay. This has been ongoing, but inflation is making it more rapid. Government, non-profits, healthcare systems, community groups, and faith communities all need to work together to address the underlying causes and sustainers of homelessness.
<b>Mental Health Kokua – Punawai Rest Stop</b>	Homeless service provider	Online survey	Elderly homeless with severe/persistent mental health and limited physical mobility and ALICE households should be prioritized for affordable housing. There is a tremendous need for homeless resource centers like Punawai Rest Stop in other communities. When human services non-profits apply for grants, there should be a minimum pay rate so staff do not have to apply for public benefits to make ends meet. Higher compensation attracts and retains the best candidates.
<b>Gregory House Programs</b>	Homeless service provider (HIV/AIDS)	Online survey	Remodel shelters and increase shelter occupancy. Create a better management system for Oahu's transitional housing programs. Repurpose empty buildings to include housing. Create joint outreach

			centers and more services in Leeward Oahu. Expand Rent-to-Work and Hele2Work. Designate more funding for prevention/diversion. Increase partnerships with other agencies.
<b>Residential Youth Services and Empowerment</b>	Homeless service provider (youth)	Online survey	Shared housing and non-congregate shelter are developmentally appropriate and affordable to youth and young adults experiencing homelessness or housing instability. Supportive services such as behavioral health, education, employment, and tenancy skills are taught in the house, similar to how young adults learn these skills in dorms or other shared living. Housing projects must be truly affordable (\$750 or less) to give youth the opportunity to get on their feet because they have not met the education and employment skills yet to make a living wage. Provide housing vouchers/subsidies for service providers, teachers, and healthcare providers, and allow homeowners to offer short-term rentals to these providers. Develop a crisis response triage like CORE for youth who are in crisis and adolescent (ages 14-24) treatment beds. Allow direct cash transfers to youth experiencing homelessness. Emphasize reconnection to education – 50% of homeless youth have not finished their high school education.
<b>Hale Kipa</b>	Homeless service provider (youth)	Online survey	There is a statewide lack of affordable housing and very limited emergency and transitional housing. There are also very limited resources for those who are still housed by threatened with homelessness. Open more buildings like Winston Hale (studios with full bathrooms) with a priority for houseless people. Rents should be truly affordable, even for those with no income. Support legislation and policies that prohibit building luxury homes while there are still people without housing and establish rent control. Provide long-term case management, behavioral health services, and rental assistance for people threatened with homelessness. Expand long-term transitional shelters without time limits and DV shelter space. A government agency should oversee supportive service provides

			to ensure they are meeting expectations. Some providers still use COVID-19 as an excuse not to provide in-person services.
<b>Waikiki Health – Keauhou Shelter</b>	Homeless service provider	Online survey	Add more Section 8 and EHV-type vouchers. Provide substance abuse treatment and money management services. Increase shelter space and affordable housing.
<b>Oahu Lived Experience Council</b>	Homeless service provider	Online survey	We do not need more shelters. They are a band-aid solution that keep people stuck in a cycle of homelessness, especially when there are no long-term housing solutions to place people into. More long-term, truly affordable housing is needed with the proper supportive wraparound services, such as Housing First. Support systems are not always in place once people get housed, so they may end up back on the streets. Work with people who are either severely struggling or have fallen behind making rent payments and continue helping them until they are caught up and are able to comfortably continue paying their rent on their own. Provide financial supports, education, and training to help them improve their lives and budget better, even during a crisis.
<b>Hawaiian Humane Society</b>	Community based non-profit	Online survey	Non-congregate, pet-friendly shelters are needed so people fleeing DV can stay with their pets. Nearly 30% of unsheltered people on Oahu report owning at least one pet and they will not abandon their pets for shelter or housing. Provide wraparound supportive services to help pet owners and their pets once they move into shelter or housing. There is currently no City funding to support pet owners moving into temporary or permanent housing with services like wellness checks, vaccines, and spay/neuter. Pets are often the most functional and loving relationships for people experiencing homelessness.



<b>Hawaii Youth Services Network</b>	Community based non-profit	Online survey	Add more rental housing for those in the lowest income categories (<60% AMI) and use mini homes to create transitional housing for young adults ages 18-24. Shallow but long-term/permanent subsidies are also needed for people on fixed incomes (e.g., elderly, persons with disabilities) and working ALICE families. Expand outreach services to youth and flexible housing options for those aging out of foster care and parenting youth.
<b>Hui O Hauula</b>	Community based non-profit	Online survey	Koolauloa needs both a non-congregate shelter and affordable housing because the nearest shelters are over 28 miles in either direction. The price of rentals in the area has skyrocketed while wages have remained the same. The unmet housing/shelter needs are in-language resources and navigators who are native speakers and who understand cultural nuances and hierarchies when helping families. Most people who live in Koolauloa would rather live on the beach than enter a homeless shelter outside the area. We need social services to help community members navigate through Med-QUEST, SNAP, housing placement, rental assistance, affordable broadband assistance, SSDI, transportation, etc. A care coordinator should be assigned to each household seeking assistance. Other resources needed are soup kitchens, food pantries, community gardens, and career development centers. Koolauloa has been invisible for too long – it's time to change.
<b>YMCA of Honolulu</b>	Community based non-profit	Online survey	Increase the stock of housing by paying for renovations and refurbishing units at lower prices than new construction. Families need wraparound services, such as child care to enable parents to work and early childhood education programs. We are ready to support increasing housing inventory through renovations and wraparound supportive services.
<b>United States Veterans Initiative</b>	Homeless service provider (veterans)	Online survey	The City should prioritize more public housing/Section 8 and help shelters expand or renovate existing areas. The City should also support more rent-to-work programs and provide assistance with security

			deposits and utility deposits. Care homes and medical respite beds are also needed. Mental illness is one of the factors that causes housing instability.
<b>Women in Need</b>	Homeless service provider (DV)	Online survey	Help homeless communities already established. More rental units should accept pets. The City could provide monetary incentives to landlords who accept pets. Give clients access to remote support services and provide transportation vouchers for appointments. People who are living paycheck to paycheck cannot establish savings for unexpected emergencies. There are many resources that exist, such as Rent to Work and Hele2Work, but people do not always know about these programs or are afraid to seek services. When people do take advantage of these resources, there is sometimes little to no follow-up support, which leaves them back where they started.
<b>Domestic Violence Action Center</b>	Homeless service provider (DV)	Online survey	The City should acquire small properties with supportive services attached for survivors to access. There are no affordable places for survivors to flee to that understand their needs and can provide the supportive services and safety that are necessary. Survivors need legal services, advocacy, crisis support, skills training, and child care.
<b>The Queen's Medical Center – Queen's Care Coalition</b>	Health care organization	Online survey	Build more affordable housing instead of market rate housing, including mini-home communities. Recruit more landlords by offering them incentives and support. Expand outreach on a permanent basis by going to the people who need help and asking how you can help. Focus on helping communities through community health workers, mental health, and substance abuse outreach.
<b>Department of Human Services – Benefit, Employment, and Social Services Division</b>	Government agency – Human Services	Online survey, phone call	HOME-ARP funds could be used for purchase of existing properties and conversion to residential use. There is an unmet need for additional shelter capacity for single adults and adult-only families, particularly those age 55+ and those with special needs that make it difficult to be served in a congregate setting. There is also a need to expand rental

			subsidies to those experiencing homelessness or at-risk of homelessness, such as expanding the Rent-to-Work TBRA program. Interim case management and transportation assistance are also important. Funding streams for non-congregate shelter and supportive services can be scarce, as most funding sources for acquisition are for housing. Because HOME-ARP is a one-time allocation, these funds are probably best used for one-time costs, such as acquisition of buildings for shelter or housing.
<b>Department of Health – East Honolulu Public Health Nursing</b>	Government agency – Health Services	Online survey	More people would be willing to get off the streets if there were non-congregate shelter rooms available immediately. Build or buy apartments, dormitories, or tiny homes for shelters. Additional supportive services are necessary for those who have mental health and substance use barriers, as they may not recognize that they have these needs. To prevent people from falling into homelessness, rent prices should be capped to prevent landlords from increasing rents whenever they want. Outreach providers struggle with high turnover, difficulty locating clients who move around to different parts of the island, etc.
<b>Department of Education – Education for Homeless Children and Youth</b>	Government agency – Education	Online survey	There should be one shelter in every outreach region. The City should partner to buy units to rent to low-income tenants. Wait lists are very long which is discouraging for those in need. There are hardly any resources for families who couch surf. Support homelessness prevention, high wage job training, and savings match program for deposits. You can't have Housing First without housing, first.
<b>Diversity Activities National Association</b>	Community based non-profit	Online survey	Provide more affordable rental housing by giving landlords funds. Supportive services needed include job training, mental health, financial literacy, life skills, and day care programs. Provide more support to the current organizations that are providing these services.

<b>Mediation Center of the Pacific</b>	Community based non-profit	Online survey	Many shelters have barriers and funding should be directed to no-barrier shelters that are designed to transition people into permanent housing. There is a lack of housing that is truly affordable for most people, especially in areas where they want to live and have connections with family, jobs, etc. People living paycheck to paycheck have no cushion in a crisis and are susceptible to homelessness. Short-term rental assistance (6-12 months) combined with mediation and supportive services can help these households remain stably housed. For those who are recently housed, programs that foster community and help them feel comfortable with the transition are necessary to prevent returns to homelessness. There are examples of shelter, housing, and supportive service programs that exist, but they are not as robust as they need to be due to a lack of funding, usually to pay enough staff and cover the cost of materials.
<b>Hawaii Tax Help</b>	Community based non-profit	Online survey	Increasing affordable rental housing inventory through acquisition and renovation of existing multi-family buildings, rather than new construction, should be a priority. This will also help to alleviate some of the issues with high rents in the private market, though the City should carefully consider the structure of rental assistance programs to disincentivize misuse of resources. Existing shelters should prioritize offering more storage space for guests' belongings. Among the qualifying populations, the City should focus on those who are about to become homeless, as this will prevent the population of people experiencing literal homelessness from increasing. As a group, the at-risk population is more motivated to take the steps necessary to avoid homelessness and get back on their feet. Rent-stable housing for seniors on fixed incomes should also be a priority because they lack the ability to keep up with market rents and increasing costs of living. The City should consider rent-to-own housing programs for people who have enough income to afford a rent or mortgage payment but lack the resources for a down

			payment.
<b>University of Hawaii – Center on Disability Studies</b>	Public agency (people with disabilities)	Online survey	Prioritize (1) TBRA, (2) affordable rentals, (3) supportive services, (4) non-congregate shelter.
<b>Ahe Group</b>	Housing developer	Online survey	Acquisitions should be avoided. It erodes the City’s tax base and the support of housing for others. There is no net benefit in terms of housing stock. There is significant unmet need across the full spectrum of rental housing. HOME-ARP funds should be used to leverage other funding sources such as federal and State LIHTC. However, these commitments would need to be made by the end of January 2023 to meet HHFDC’s application processing deadline of February 2023.
<b>Hawaii Civil Rights Commission</b>	Government agency – Civil Rights and Fair Housing	Email, virtual meeting	The Hawaii Civil Rights Commission regularly interacts with numerous housing providers and housing consumers around the state regarding a variety of housing discrimination issues. The most consistent and overwhelming concern we have found across the board is the need for more affordable rental housing. We also have found that there is an urgent need for additional supportive services, particularly services to assist persons with disabilities and survivors of domestic violence.
<b>Legal Aid Society of Hawaii</b>	Community-based non-profit – Civil Rights and Fair Housing	Email, virtual meeting	The Legal Aid Society of Hawaii offers comments on service animals and emotional support animals that assist people with disabilities. In addition to not accepting pets, shelters often do not accept assistance animals (service dogs and emotional support animals), which likely speaks to the lack of knowledge or education that shelters and service providers have as to the distinction between pets and assistance animals.

**Table 1 – Agencies Consulted**

## Public Participation

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

- **15-day Public comment period:** March 3 – March 18, 2023
- **Public hearings:** September 20, 2022 (virtual), September 22, 2022 (in-person)

The City partnered with the Hawaii Housing Finance and Development Corporation (HHFDC) to conduct a virtual and in-person public hearing regarding updates to the Annual Action Plan. On September 6, 2022, HHFDC published a Notice of Public Hearing (Notice) inviting the public to comment on the City's Annual Action Plan (Appendix A). HHFDC published the Notice in the Honolulu Star-Advertiser, Hawaii Tribune Herald, West Hawaii Today, The Garden Island, and The Maui News. The Notice was also posted to the HHFDC website at [www.hawaii.gov/dbedt/hhfdc](http://www.hawaii.gov/dbedt/hhfdc).

Following submission to the Honolulu City Council, the City's HOME-ARP Allocation Plan draft was published for a public comment period from March 3, 2023 through March 18, 2023. The Notice was published in the Honolulu Star-Advertiser (see Appendix B).

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

In order to make information readily available to the public, the City uses its website to facilitate providing information to the public. The current Action Plan, as well as Action Plans for prior years, and the Consolidated Plan for Project Year 2021-2025 are available at <http://www.honolulu.gov/cms-bfs-menu/site-bfs-sitearticles/408-federal-grants.html>.

To broaden public participation and input, the City employed the use of social media and online survey tools to make the participation process more accessible, especially during the COVID-19 pandemic. The City's joint public hearing process with HHFDC also offered a virtual option for participants who were unable to attend an in-person hearing due to COVID-19 concerns, transportation challenges, or time constraints. City staff regularly participated in virtual meetings with interested stakeholders and parties, including the Oahu Continuum of Care and subcommittees, Homeless Funders Hui, and the Hawaii Interagency Council on Homelessness, for the purposes of sharing information and soliciting input on funding priorities. In addition, the City routinely compiles feedback from constituents, Councilmembers and other elected officials, and providers to better inform decision-making related to homelessness and affordable housing strategies.

Members of the public were afforded additional opportunities to submit written or verbal testimony on the City's Draft HOME-ARP Allocation Plan during the Honolulu City Council hearing process. The formalized process to obtain Honolulu City Council approval provides an additional layer of transparency for decision-makers and constituents.

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

During the public participation process, respondents generally agreed that affordable permanent housing options for people experiencing homelessness were the most urgent need.

Respondents suggested various types of affordable housing, including traditional apartment rentals and tiny homes. Supportive services to help people acquire and sustain housing were also highly rated. Housing vouchers were not prioritized as highly due to already low housing inventory on Oahu and the challenges faced by prospective renters in the private market. While some respondents suggested that specialized non-congregate emergency shelters (e.g., pet-friendly, accommodating to older adults, located in rural or underserved areas, etc.) were necessary to help reduce unsheltered homelessness, others felt that no new funding should be directed to temporary housing options. Several homeless service providers shared the capacity challenges faced by non-profit agencies, including staffing shortages, burnout, and attrition.

The City received one public comment on the proposed HOME-ARP Allocation Plan during the public comment period (Table 2).

Individual/ Organization	Type of Organization	Method of Public Comment	Feedback
Individual	N/A	Email	To whom it may concern,  I would like to suggest more funds for veterans services and non-profit operating costs.  Thank you for your consideration.  [Name Redacted]

Table 2 – Public Comments Received

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

The City accepted written and verbal comments from service providers, government partners, and other required collaborators in the development of the HOME-ARP Allocation Plan. The City also accepted public comments on the draft HOME-ARP Allocation Plan during the public comment period from March 3, 2023 through March 18, 2023.

While all comments and recommendations were considered during the development process, the City based its final HOME-ARP funding allocations on a variety of factors, including overall system need, availability of complementary funding, and goals of the HOME-ARP program. Support was received for all eligible categories of the HOME-ARP program, though the need for affordable, permanent housing inventory was nearly universally supported by respondents.

A summary of the City’s final HOME-ARP funding allocations and justifications is provided in the “HOME-ARP Activities” section.

## Needs Assessment and Gaps Analysis

To estimate the unmet needs of qualifying populations, the City compared existing data with input from key stakeholders. Data sources used to inform the Needs Assessment and Gap Analysis include the 2022 Point-in-Time (PIT) Count data tables and reports, the 2022 Housing Inventory Count (HIC), the 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data, and the 2019 Hawaii Housing Planning Study. The City recognizes that these existing data sources may not accurately capture the true scope of community need, especially as economic conditions and the availability of resources continues to shift.

Needs Assessment and Gap Analysis – Homeless									
	Current Inventory			Homeless Population				Gap Analysis	
	Family Adults and their child(ren)	Individuals Without child(ren)	Veterans* and Persons in Veteran Families	Family HH Individuals Adults and their child(ren)	Individuals Without Child(ren)	Veterans* and Persons in Veteran Families	Victims* of Domestic Violence	Family	Individuals
	Number of Beds	Number of Beds	Number of Beds	Number of Family HH Individuals	Number of Individuals			Number of beds needed	Number of beds needed
Emergency Shelter	740	760	93						
Transitional Hsg.	598	211	48						
Permanent Supp. Housing	766	1,278	826						
Other Permanent Housing	160	525	0						
Sheltered Homeless				785	811	145	227		
Unsheltered Homeless				148	1,836	78	155		
Current Gap								750	2,442

\*These columns are subpopulations within the family and individual columns

**Table 3 – Homeless Needs Inventory and Gap Analysis Table**

Data Sources: 1. 2022 PIT Count Report; 2. 2022 Housing Inventory Count, 3. 2019 Hawaii Housing Planning Study

Table 3 reflects the most recent counts of shelter and housing beds for people experiencing homelessness on Oahu and the most recent PIT Count estimates from 2022. The 1,596 individuals in the sheltered count are occupying emergency shelter, transitional housing, and safe haven beds that are included in the HIC.

The gap analysis of beds needed for individuals and families experiencing homelessness was estimated using data from the 2019 Hawaii Housing Planning Study (HHPs), which found that approximately 19% of homeless households can be permanently housed with existing resources each year. The remaining 81% of households require additional resources outside of the current inventory or may cycle through multiple housing options before stabilizing. The gap analysis approximates needs based on the number of people experiencing literal homelessness during the PIT Count, which is not wholly inclusive of all homeless households.

Table 4 reflects the approximate housing needs for renters at the 30% and 50% AMI levels using



data from the 2015-2019 Comprehensive Housing Affordability Strategy (CHAS). The estimated gap of 42,350 households is calculated based on the difference between the numbers of rental units occupied by households at 30% and 50% AMI levels and the numbers of rental units considered affordable to households at those AMI levels. Households living in affordable units are not considered cost-burdened, meaning that they are not paying more than 30% of their household income toward housing costs. The estimated gap does not include prospective renter households who are living in shared housing due to economic hardship or other circumstances.

<b>Needs Assessment and Gap Analysis – Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	<b># of Units</b>	<b># of Households</b>	<b># of Households</b>
Total Rental Units	137,045		
Rental Units Occupied by HH at or below 30% AMI	30,325		
Rental Units Occupied by HH between 30 – 50% AMI	24,550		
Rental Units Affordable* to HH at or below 30% AMI	8,020		
Rental Units Affordable* to HH at 50% AMI	11,315		
0% to 30% AMI Renter HH w/ 1 or more housing problems		23,210	
30% to 50% AMI Renter HH w/ 1 or more housing problems		21,220	
Current Gap (0% to 50% AMI)			42,350

\*To be considered affordable, housing costs must not exceed 30% of a household's income.

**Table 4 – Housing Needs Inventory and Gap Analysis Table**

Data Sources: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

### *Size and Demographic Composition of Qualifying Populations*

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

HOME-ARP funds will be used to benefit individuals and families in the City and County of Honolulu who meet HUD's defined criteria of one of the four subpopulations:

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) ("McKinney-Vento");
- At risk of homelessness, as defined in section 401 of McKinney-Vento;
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or
- Part of other populations where providing supportive services or assistance would prevent a family's homelessness or would serve those with the greatest risk of housing instability.

## Qualifying Population #1 – Homeless Populations

For HOME-ARP, “homelessness” is defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) (“McKinney-Vento”). The McKinney-Vento definition of homelessness includes households living in places not meant for human habitation, shelters, and households exiting public institutions after 90 days or less who were living in places not meant for human habitation or shelters prior to entry. The McKinney-Vento definition also includes households who are imminently losing housing within the next 14 days and lack the resources or support networks to obtain other permanent housing, and unaccompanied youth under age 25 or families with children and youth who meet the definition of “homeless” under other federal Acts specified in the definition.

The annual Point-in-Time (PIT) Count is mandated by HUD as a condition of federal funding. The PIT Count is a method of identifying individuals and families experiencing sheltered and unsheltered homelessness during the last week of January at least every other year. In accordance with HUD Continuum of Care requirements in 24 CFR 578, the PIT Count does not reflect households at-risk of homelessness, such as households facing eviction within 14 days, households living in doubled-up or overcrowded conditions, or households residing in public institutions.

The 2022 PIT Count was conducted on March 10, 2022, as a result of an extension granted by HUD due to COVID-19 concerns. A total of 3,945 individuals experiencing homelessness were counted and surveyed, including 1,596 individuals in shelters and 2,349 individuals living in places not meant for human habitation (Table 5.) While the total number of individuals counted in 2022 reflects a decrease of approximately 11% (a decrease of 503 individuals) since 2020, the percentage of unsheltered individuals increased from 47% in 2020 to 60% in 2022. Details of sheltered and unsheltered populations are provided in Table 6.

Homeless – City and County of Honolulu						
Sheltered Homeless			Unsheltered Homeless			Total Sheltered and Unsheltered Individuals
Family HH Individuals Adults and their Child(ren)	Individuals Without child(ren)	Total Sheltered Homeless	Family HH Individuals Adults and their Child(ren)	Individuals Without child(ren)	Total Unsheltered Homeless	
785	811	1,596	142	2,205	2,349	3,945

**Table 5 – Sheltered and Unsheltered Homeless Populations**

Data Source: HUD 2022 PIT Count

<b>Homeless Subpopulations – City and County of Honolulu</b>		
	<b>Sheltered Homeless</b> Emergency Shelter, Transitional Housing, and Safe Haven	<b>Unsheltered Homeless</b> Places not meant for human habitation
<b>Chronically Homeless persons</b>	311	497
<b>Persons in Veteran households</b>	127	71
<b>Survivors of Domestic Violence</b>	227	155
<b>Adults with Serious Mental Illness</b>	418	322
<b>Adults with Substance Use Disorder</b>	330	280
<b>Adults with HIV/AIDS</b>	26	11
<b>Adults with Physical, Developmental, or Other Disability</b>	453	296

**Table 6 – Sheltered and Unsheltered Homeless Subpopulations**

Data Source: 1. HUD 2022 PIT Count, Honolulu City and County CoC; 2. 2022 PIT Count Report, Partners in Care

**Sheltered** individuals are persons residing in emergency shelters, transitional housing, and safe havens. Of the 1,596 sheltered individuals, 963 (60%) resided in emergency shelters and 633 (40%) resided in transitional housing and safe haven programs. A total of 811 (51%) sheltered individuals were members of adult-only households or unaccompanied minors. A total of 785 (49%) sheltered individuals were members of family households with minor children. Within the sheltered population, 311 individuals were chronically homeless, 127 individuals were veterans or veteran family members, and 227 individuals were survivors of domestic violence. Among sheltered adults, 418 were diagnosed with a serious mental illness, 330 were diagnosed with substance use disorder, and 26 were diagnosed with HIV/AIDS. A total of 453 individuals reported being diagnosed with a physical, developmental, or other disability.

While the definition of “homeless” in 24 CFR 91.5 and HUD CPD Notice: CPD-21-10 includes households who will lose their primary nighttime residence within 14 days and lack the resources or support networks needed to find other permanent housing, the PIT Count does not reflect these households in the sheltered count.

**Unsheltered** individuals are persons residing in places not meant for human habitation. Of the 2,349 unsheltered individuals, 2,207 (94%) were members of adult-only households or unaccompanied minors. The remaining 142 (6%) were members of family households with minor children. Within the unsheltered population, 497 individuals were chronically homeless, 71 individuals were veterans or veteran family members, and 155 individuals were survivors of domestic violence. Among unsheltered adults, 322 were diagnosed with a serious mental illness, 280 were diagnosed with substance use disorder, and 11 were diagnosed with HIV/AIDS. A total of 296 individuals reported being diagnosed with a physical, developmental, or other disability.

Unsheltered individuals were counted and surveyed in all regions of the City and County of Honolulu. Regions with the highest concentrations of unsheltered individuals are the Urban Honolulu (622 individuals) and East Honolulu (575 individuals) regions, followed closely by the

Leeward (424 individuals) and Ewa (318 individuals) regions. A total of 166 individuals were counted in the Central Oahu and North Shore region, 152 individuals in the Lower Windward region, and 98 individuals in the Upper Windward region.

The PIT Count methodology for the unsheltered survey included two options: (1) PIT survey with self-reported answers or (2) observation tool for individuals who were sleeping or unable or unwilling to answer the survey questions. The 2022 PIT Count Report published by PIC reflects some “unknown” responses for individuals who were counted using the observation tool. PIC and its membership continue to evaluate and modify the PIT Count methodology with input from key stakeholders.

Of the total population of people experiencing homelessness in the City and County of Honolulu, 3,192 (81%) are adults aged 25 and older. 208 individuals (5%) were young adults between the ages of 18 and 24, and the remaining 545 individuals (14%) were children under the age of 18. Of the population of young adults between the ages of 18 and 24, 29 were parenting youth. Of the population of children under the age of 18, 33 were children of parenting youth, and 6 were unaccompanied minors.

A total of 3,475 individuals (88%) identified as Non-Hispanic/Non-Latino and the remaining 470 (12%) as Hispanic/Latino. A total of 1,623 individuals (41%) identified as Native Hawaiian or Other Pacific Islander, 960 (24%) identified as being One or More Races, 748 (19%) identified as White, 419 (11%) identified as Asian, 168 (4%) identified as Black or African American, and 27 (1%) identified as American Indian or Alaskan Native.

### **Qualifying Population #2 – At-Risk of Homelessness**

Persons at-risk of homelessness are defined in 24 CFR 91.5 as: (1) an individual or family: with an annual income below 30% AMI, does not have sufficient resources or support networks, immediately available to prevent them from becoming homeless, and meets one of seven conditions listed in section (iii) of the definition; (2) a child or youth who does not qualify as “homeless” under 24 CFR 91.5 but qualifies as “homeless” under sections of other Acts listed in the HUD CPD Notice: CPD-21-10; and (3) a child or youth who does not qualify as “homeless” under 24 CFR 91.5 but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

According to the Hawaii Housing Planning Study (HHPs) Housing Demand Survey, households with income levels at or below 30% AMI (extremely low-income) represent approximately 17% of all households on Oahu. Within the City and County of Honolulu, the concentration of extremely low-income households is higher in West Oahu, parts of urban Honolulu, and parts of upper Windward Oahu.

To meet the definition of “at-risk of homelessness” as defined in 24 CFR 91.5, extremely low-income households must also lack the resources to prevent them from becoming homeless and meet additional criteria. The City and County of Honolulu estimates the approximate need for this subpopulation using the following indicators:

➤ **Extremely Low-Income Renter Households Receiving Homelessness Prevention Assistance (Emergency Solutions Grant)**

<b>At-Risk of Homelessness</b>			
<b>Extremely Low-Income Households Receiving Homelessness Prevention Assistance (Emergency Solutions Grant)</b>			
<b>Number of Households at or Below 30% AMI Receiving Homelessness Prevention Assistance</b>	<b>PY 2019 (7/1/19-6/30/20)</b>	<b>PY 2020 (7/1/20-6/30/21)</b>	<b>PY 2021 (7/1/21-6/30/22)</b>
	312	195	213

**Table 7 – At-Risk of Homelessness: ELI Households Receiving Homelessness Prevention Assistance (ESG)**

Data Source: CAPER PY2019, CAPER PY2020, CAPER PY2021

Homelessness Prevention programs offered through the Emergency Solutions Grant (ESG) program are limited to households who meet the definition of “at-risk of homelessness” in 24 CFR 576.2 and have an annual income below 30% AMI. To qualify for Homelessness Prevention assistance, extremely low-income households must demonstrate an upcoming loss of housing or other indicator of housing instability.

Table 7 depicts the number of extremely low-income households receiving ESG Homelessness Prevention assistance. In PY 2019, ESG Homelessness Prevention programs assisted 312 Oahu households at-risk of homelessness. The statewide eviction moratorium and availability of other federal rental assistance programs during the COVID-19 pandemic impacted the utilization of Homelessness Prevention programs in PY 2020 and 2021, resulting in fewer households applying for and receiving assistance.

The number of extremely low-income households receiving ESG Homelessness Prevention assistance represents a low estimate of the total need due to program limitations and funding restrictions. Extremely low-income households may lack the proper documentation to successfully apply for ESG Homelessness Prevention funds. In other circumstances, landlords may refuse payment from third-party vendors on behalf of tenants. Finally, households above the 30% AMI limit are not considered “at-risk of homelessness” for the ESG program, but may meet the eligibility requirements for other types of eviction prevention assistance programs.

➤ **Extremely Low-Income Renter Households Unable to Afford Rent and Utilities**

The eviction moratorium and federal rental assistance programs in place during the COVID-19 pandemic created a temporary reprieve for many renters facing economic hardship. The City and County of Honolulu’s Rent and Utility Relief Program (RURP) was nationally recognized for the ability to quickly disburse funds to households in need. The RURP disbursed approximately \$224 million in rent and utility payments through December 2022, assisting over 16,000 households.

NHPI households represented 37.2% of households receiving RURP assistance, followed closely by Asian households at 33.7%. Households identifying as White represented 16.5% of the total, while Black or African American households accounted for 4.5% and Native American or Alaskan Native households accounted for 1.1%. Data were not available for 7.1% of households assisted.

While eligibility for the RURP was eventually offered to households earning up to 80% AMI at the time of application, approximately 61% of all rental and utility assistance payments were made to households earning less than 30% AMI at the time of application. Although specific demographic data for extremely low-income households is not yet available, the overrepresentation of NHPI households in the total number of households receiving RURP assistance is likely present in the extremely low-income subpopulation.

➤ **Extremely Low-Income Renter Households Facing Eviction**

Hawaii’s eviction moratorium during the COVID-19 pandemic expired on August 6, 2021. Act 57 (SLH 2021) provided additional protections for tenants and funded free, mandatory mediation services for all tenants facing eviction through August 6, 2022. On Oahu, mediation services were provided by the Mediation Center of the Pacific. Referrals to mediation came directly from landlords and tenants, the courts, and legal advocacy groups, such as the Legal Aid Society of Hawaii.

<b>City and County of Honolulu – Eviction Mediation Cases August 2021 – August 2022</b>		
	<b>Eviction Mediation Cases Referred/Opened</b>	<b>Households At or Below 30% AMI During Mediation</b>
<b>Number of Households</b>	1,395*	906

\*May include duplicated households who received multiple mediation referrals during the one-year data collection period.

**Table 8 – At-Risk of Homelessness: ELI Households Facing Eviction**  
Data Source: Mediation Center of the Pacific

During the one-year period covered by Act 57, the Mediation Center of the Pacific opened nearly 1,400 eviction mediation cases for tenants facing eviction within the jurisdiction of the City and County of Honolulu (see Table 8). Based on self-reported household income during the mediation intake process, approximately 900 households (65%) were considered extremely low-income. Among extremely low-income households who chose to self-report the head of household’s ethnicity, a majority identified as a race other than White. Native Hawaiians and other Pacific Islanders (NHPI) were overrepresented in the number of extremely low-income households referred for eviction mediation services. In many months, the NHPI households represented over 75% of all extremely low-income households receiving eviction mediation services. Although the available data is limited by self-reporting, the overrepresentation of extremely low-income NHPI households facing eviction is consistent with overrepresentation in other areas of need, such as households experiencing homelessness.

Notably, all households receiving eviction mediation assistance were asked to self-report whether the loss of their current rental housing would put them at-risk of homelessness (e.g. living in a shelter, vehicle, etc.) or housing instability (e.g. temporarily living with family, downsizing to an overcrowded unit, etc.). All 906 extremely low-income households receiving eviction mediation services self-reported being at-risk of homelessness or housing instability if they were to be evicted.

The indicators for the population of households meeting the “at-risk of homelessness” definition provide a snapshot of this qualifying population. While the indicators do not provide a comprehensive census of all households meeting this definition, the following trends have been observed:

- NHPI households are likely overrepresented in the population of households at-risk of homelessness.
- Extremely low-income households represent a majority of households facing eviction. Over a one-year period following the ending of the statewide eviction moratorium, a total of 906 extremely low-income households facing eviction were identified in the mandatory mediation referral process.
- The total number of extremely low-income households at-risk of homelessness as defined in 24 CFR 91.5 is greater than the data indicators available to the City and County of Honolulu. Many extremely low-income households facing a loss of housing may be reluctant to seek assistance, or may struggle to meet the eligibility criteria for programs that may be available.

The City and County of Honolulu expects that the number of households at-risk of homelessness may increase as the cost of living continues to rise and COVID-19 financial assistance programs cease.

### **Qualifying Population #3 – Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**

For HOME-ARP, this qualifying population includes individuals or families fleeing or attempting to flee domestic violence (as defined in 24 CFR 5.2003), dating violence (as defined in 24 CFR 5.2003), sexual assault (as defined in 24 CFR 5.2003), stalking (as defined in 24 CFR 5.2003), and human trafficking (as defined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102)).

#### **➤ Domestic Violence, Including Intimate Partner Violence, Dating Violence, and Stalking**

In 2021, the Honolulu Police Department reported more than 2,600 cases of intimate partner violence, which includes both domestic violence among partners sharing a household and dating violence. This number represents an undercount of the actual prevalence of intimate partner violence, as many victims are unwilling or unable to come forward. Consultation with local organizations engaged in domestic violence services reveals a high demand for these resources. The Hawaii State Coalition Against Domestic Violence (HSCADV) estimates that approximately 12% of Oahu residents have experienced domestic violence in their lifetime. In a single day, domestic violence programs may serve upwards of 950 survivors and their dependents and receive over 80 hotline calls. Between October 2020 and September 2021, domestic violence shelters provided safe places to go for over 1,000 adults and children statewide. While specific shelter referral data for the City and County of Honolulu was not available, it is estimated that a majority of shelter referrals were made within the jurisdiction due to population estimates and shelter inventory.

The 2022 PIT Count for the City and County of Honolulu identified 103 adults who reported actively fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking. In addition, 382 adults reported experiencing domestic violence in the past. Households fleeing domestic violence may be assessed for homeless housing resources through CES. Identifying household information is kept confidential and the CES process is managed by Child and Family Service, a recognized provider of domestic violence and family services. Since January 2021, the DV CES has referred 165 survivor households to housing resources. 81 households have been housed.

PIT Count demographic data for the City and County of Honolulu does not distinguish between different subpopulations within this qualifying population. The City and County of Honolulu consulted with established non-profit organizations serving this qualifying population to better understand the demographic representation of households meeting this criteria. Persons seeking services for domestic violence, including intimate partner violence and dating violence:

- Are usually females between the ages of 25 to 34;
- May have young children;
- Are more likely to be Asian or NHPI, or an immigrant to Hawaii;
- Are likely to have been homeless at least once;
- Have a high school education or less; and
- Do not earn enough income to minimize their risk of homelessness or achieve financial self-sufficiency.

#### ➤ **Sexual Assault**

Longitudinal data from the Sex Abuse Treatment Center yields additional demographic data about individuals who have been victims of sexual assault within the City and County of Honolulu. Over a ten-year period, approximately 5,095 sexual assault survivors received treatment and services. Ninety percent of sexual assault survivors were female, and the average age at the time of sexual assault was 18 years. Nearly 30% of survivors were of Native Hawaiian ancestry, and 26.3% were White. Approximately 18% of survivors were Asian, and 17.4% identified as two or more races. Survivors were more likely to be assaulted by an acquaintance or intimate partner, compared to a stranger.

#### ➤ **Trafficking**

Due to the nature and stigma of human trafficking, including sex trafficking, the size of this subpopulation is difficult to estimate. According to the 2020 Sex Trafficking in Hawaii report, over 100 survivors of sex trafficking were identified in Hawaii. More than half of survivors in the study also identified as being survivors of labor trafficking. Within this total, 64% identified as Native Hawaiian, and nearly 70% reported being homeless. A total of 44 survivors of sex trafficking were living on Oahu. Thirty survivors identified as female, and 25 identified as Native Hawaiian. LGBTQ+ survivors represented 34% of survivors on Oahu.

The City recognizes that domestic violence, dating violence, sexual assault, stalking, and human



trafficking are highly underreported, as many victims are unable or unwilling to seek assistance due to fear and stigma. However, the overrepresentation of Native Hawaiian individuals in this qualifying population is consistent with overrepresentation in other qualifying populations. The City expects that the total number of households in this qualifying population exceeds any official data sets and estimates due to the complex nature of domestic violence, dating violence, sexual assault, stalking, and human trafficking crimes.

#### **Qualifying Population #4 – Other Populations**

HOME-ARP allows assistance to be provided to qualifying populations who do not meet any of the other eligibility criteria, but are: (1) households who have previously qualified as “homeless” under 24 CFR 91.5, are currently housed due to temporary financial assistance, and require additional financial assistance or supportive services to remain housed; or (2) are households at the greatest risk of housing instability because (a) their household income is less than 30% AMI and they are experiencing severe cost burden or (b) their household income is less than 50% AMI and they meet at least one condition of “at-risk of homelessness” in 24 CFR 91.5.

The qualifying population considered at greatest risk of housing instability is comprised of a diverse range of household characteristics. The City and County of Honolulu estimates the approximate need for this subpopulation using the following indicators:

##### **➤ Extremely Low-Income Households Experiencing Severe Cost Burden**

The 2015-2019 CHAS data shows that approximately 25,650 households on Oahu have a total household income of 30% AMI or less and are paying more than 50% of their income toward housing costs (Table 9.) This data set is used to estimate the number of extremely low-income renters who are at the greatest risk of housing instability due to severe cost burden. For renters, housing costs include gross rent and utilities. For owners, housing costs include mortgage payments, utilities, association fees, insurance, and property taxes. Of these households, over 70% are renters.

<b>Other Populations – Greatest Risk of Housing Instability</b>		
<b>Households with Income from 0% to 30% AMI and Experiencing Severe Cost Burden</b>		
	<b>Number of Households</b>	<b>% of All Households</b>
<b>Renters</b>	18,690	14%
<b>Owners</b>	6,960	4%
<b>Total</b>	25,650	8%

**Table 9 – Greatest Risk of Housing Instability – Household Income from 0% to 30% AMI and Experiencing Severe Cost Burden**  
Data Source: 2015 – 2019 CHAS data

##### **➤ Low-Income Households Meeting at Least One Condition of “At-Risk of Homelessness” in 24 CFR 91.5**

Data from the State Homeless Emergency Grants (SHEG) Program is used to estimate the number of households at or below 50% AMI who meet at least one condition of “at-

risk of homelessness” in 24 CFR 91.5. This program provides services similar to the ESG Homelessness Prevention programs, but eligibility is open to households earning up to 50% AMI. In 2022, 118 individuals and 90 families on Oahu received financial assistance from the SHEG Program. During this time, the City’s RURP was also available, which likely affected the overall utilization of the SHEG Program. While specific demographic data for these households is not available, the City infers that the demographic composition of these households is similar to households seeking RURP assistance.

➤ **Formerly Homeless Households Who Are Currently Housed with Temporary Support and Who Require Ongoing Support to Remain Housed**

The number of formerly homeless households who are receiving temporary financial assistance and require ongoing assistance to avoid returning to homelessness is difficult to estimate due to a number of factors. Within the City and County of Honolulu, the Rapid Rehousing (RRH) program is a common form of temporary financial and case management assistance for people experiencing homelessness. By the end of the period of assistance, households are expected to be financially self-sufficient and capable of sustaining housing with little to no ongoing support.

NHPI individuals account for approximately 47% of individuals enrolled in Oahu RRH programs, while 27% identify as two or more races, 11% identify as White, 9% identify as Black or African American, and 5% identify as Asian. Approximately two-thirds of households enrolled in Oahu RRH programs are families that include adults and minor children. While chronic homelessness is not an eligibility requirement for RRH programs, approximately 53% of adults reported being diagnosed with a chronic health condition, 51% reported being diagnosed with a mental illness, 37% reported being diagnosed with a physical disability, 20% reported being diagnosed with a substance use disorder, and 14% reported being diagnosed with a developmental disability.

<b>Other Populations – Greatest Risk of Housing Instability</b>						
<b>Formerly Homeless, Housed with Temporary Support, and Require Ongoing Support to Remain Housed</b>						
	<b>2020</b>		<b>2021</b>		<b>2022</b> <i>(Jan. – Sep.)</i>	
	<b>Total Number of Exits</b>	<b>% of All RRH Exits</b>	<b>Total Number of Exits</b>	<b>% of All RRH Exits</b>	<b>Total Number of Exits</b>	<b>% of All RRH Exits</b>
<b>Number of Individuals Exiting RRH Programs</b>	<b>1,410</b>	<b>100%</b>	<b>1,071</b>	<b>100%</b>	<b>775</b>	<b>100%</b>
Number of Individuals Exiting RRH Programs to Other Subsidized Housing	570	40.4%	401	37.4%	323	41.6%
Number of Individuals Exiting RRH Programs to Homelessness	140	9.9%	126	11.7%	47	6%
Number of Individuals Exiting RRH Programs to Other Temporary Situations	66	4.6%	94	8.7%	N/A	N/A

**Table 10 – Greatest Risk of Housing Instability – Formerly Homeless, Housed with Temporary Support, and Require Ongoing Support to Remain Housed**

Data Source: Partners in Care HMIS Exit Data

Table 10 depicts the total number of individuals exiting RRH programs within the City and County of Honolulu in 2020, 2021, and 2022 (partial year). While a majority of individuals are considered permanently housed at the time of their exit from RRH, a significant percentage of individuals receiving RRH assistance exit the program to another subsidized housing program, such as Section 8, HUD-VASH, public housing, or Emergency Housing Vouchers. Between 2020 and 2022, the percentage of individuals exiting RRH to other subsidized housing destinations averaged approximately 40%.

A percentage of individuals exit RRH programs to homelessness or other temporary destinations, such as hotels or overcrowded housing. In 2020, individuals exiting RRH to homelessness or other temporary situations represented 14.6% of all exits (206 individuals). In 2021, the percentage increased to 20.5% of all exits (220 individuals). Complete data for 2022 is not yet available. However, approximately 6% of all exits (47 individuals) were to homelessness. Among households exiting RRH programs to homelessness, families with adults and minor children are more likely to exit to emergency shelters, while single adults and adult-only households are more likely to exit to unsheltered destinations. The City and County of Honolulu infers that a majority of the individuals exiting RRH to homelessness or other temporary situations required ongoing support in order to remain housed, and likely could have continued to remain housed if a comparable resource were available.

Between 2020 and 2021, the average number of individuals who exited RRH programs to other subsidized housing programs, homelessness, or other temporary situations was approximately 700. The City and County of Honolulu recognizes that the estimated 700 formerly homeless individuals who require ongoing support to remain housed is an undercount of this subpopulation. RRH program exit data is captured at a single point in time, and future follow-ups with formerly homeless households may yield additional data about ongoing financial and supportive service needs. However, future follow-ups are not always consistent or possible due to provider capacity issues, loss of contact with assisted households, and reliability of self-reported data. Furthermore, the availability of new housing programs available under the American Rescue Plan Act, such as the Emergency Housing Voucher program, may have offset the number of individuals who would have exited RRH programs to homelessness or other temporary situations. The City and County of Honolulu expects that the number of formerly homeless individuals who require ongoing support to remain housed may rise as overall housing prices increase.

### *Unmet Housing and Service Needs of Qualifying Populations*

***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***
- ***Those fleeing domestic violence, dating violence, sexual assault, stalking and human trafficking***

- ***Other families requiring services or housing assistance or to prevent homelessness; and those at greatest risk of housing instability or in unstable housing situations.***

### **Qualifying Population #1 – Homeless Populations**

Table 2 reflects the numbers of people experiencing homelessness during the 2022 PIT Count and the numbers of shelter and housing beds in the 2022 HIC. Gap need was estimated based on several factors: (1) difference between the number of HIC units and individuals in the PIT Count, (2) approximate occupancy rate of HIC units, and (3) community input from CoC membership and key stakeholders. It is important to note that the availability of shelter and housing units fluctuates, and the inventory of shelter and housing units does not accurately reflect the number of beds that are filled at any given time.

The greatest unmet need for people experiencing homelessness is affordable permanent housing, especially permanent housing with supportive services for those with higher needs. Permanent housing may be scattered-site (e.g., tenant-based vouchers) or site-based (e.g., set-aside units, project-based vouchers, etc.). In recent years, the limited availability of housing inventory has created challenges for scattered-site permanent housing programs, as homeless individuals with housing vouchers must compete with other renters seeking affordable housing. Stigma and other housing barriers often complicate the housing search process, resulting in some households spending months searching for a rental unit.

The lack of affordable permanent housing creates additional pressure on other resources, as individuals seeking permanent housing may spend more time in emergency shelters. Low-barrier emergency shelters serve as critical access points for unsheltered individuals seeking safety and supportive services as they navigate to permanent housing. The lack of outflow from shelters to housing reduces the availability of shelter beds for unsheltered individuals. The unmet need for shelter beds is further impacted by the needs and preferences of individuals, such as geographic region, congregate vs. non-congregate arrangements, and household composition requirements. The COVID-19 pandemic created an additional demand for non-congregate shelter options, a departure from the traditional model of fully shared facilities. Shelter availability in Central Oahu, the North Shore, and the Windward Coast is extremely limited or non-existent, presenting a challenge for unsheltered individuals residing in those regions who do not want to relocate to another part of the island.

A small but significant subset of the population of people experiencing homelessness requires a higher level of care than permanent supportive housing. These individuals require specialized housing due to acute medical or behavioral health needs. These needs can include skilled nursing care, 24-hour supervision, or other services that cannot be met in a traditional independent housing environment. Related to this group are formerly homeless individuals who have been housed but are struggling to live independently due to age or deteriorating health.

Supportive services tailored to the needs of the individual are essential. While long-term supportive services are generally available in permanent supportive housing, other permanent housing options, such as rapid rehousing or private rental housing, do not include long-term supportive services. These resources are often paired with short-term housing case management, which may be discontinued after a period of time. Furthermore, households who

have “graduated” from intensive case management services may still require temporary assistance in the future in order to remain stably housed. This is especially important for households who have transitioned from permanent supportive housing to programs such as Section 8 or the Emergency Housing Voucher program, which only provide rental subsidies.

### **Qualifying Population #2 – At-Risk of Homelessness**

Households considered at-risk of homelessness are income-constrained (earning 30% AMI or less) and lack the resources and support networks to prevent them from becoming literally homeless. Households earning less than 30% AMI struggle to identify affordable rental housing units, especially unsubsidized units, and are often forced to double up with other family members to remain housed. For those who are able to rent or own their own homes, over half will be severely cost burdened (paying more than 50% of their income toward housing costs).

The National Low Income Housing Coalition (NLIHC) estimates that an Oahu household earning 30% AMI would be able to afford a rent of \$850 per month. In contrast, the Fair Market Rent (FMR) for a 1-bedroom unit is over \$1,700 per month. For households on fixed incomes, such as Supplemental Security Income (SSI), the affordable rent price is \$252 per month. The NLIHC estimates that there is a statewide shortage of over 23,000 rental units at prices affordable to extremely low-income renters.

Addressing the needs of households at-risk of homelessness requires expanding the inventory of housing units affordable to this population. Most respondents concurred that increasing the available housing inventory through acquisition, development, or renovations was the highest priority, while TBRA and homelessness prevention were additional options. At this time, COVID-19 eviction prevention resources through the City’s Rent and Utility Relief Program are beginning to wind down, and funding for these short-term rental assistance programs will need to come from other sources.

### **Qualifying Population #3 – Fleeing or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking**

Several respondents identified the need for additional domestic violence shelters, especially shelters that accept pets. The lack of shelters that accept pets may force victims to continue to remain in unsafe situations. Since shelters are the most immediate solution to help victims find safety, these resources should not be discounted. In addition to the shelter and housing resources needed, survivors of domestic violence, dating violence, sexual assault, stalking, and human trafficking require additional supportive services and legal advocacy. These resources must be paired with shelter and housing to ensure survivors remain safely housed. Many survivors lack the financial resources to live independently right away and will require wraparound support with employment, education, child care, immigration, and counseling.

### **Qualifying Population #4 – Other Populations**

Other qualifying populations include formerly homeless households who would be homeless if not for ongoing financial assistance and low- and extremely low-income households who are severely cost burdened or meet one of the other at-risk criteria. To remain stably housed, formerly homeless households must be paired with housing resources that are best suited to

their needs, with enough flexibility if unexpected emergencies arise. For households who receive temporary financial assistance, appropriate wraparound services are necessary to ensure they have access to the earning potential needed to sustain market rate housing. Households with acute needs, including those with long-term disabilities that prevent them from increasing their income, will require indefinite rental assistance and supportive services. These households are at-risk of homelessness if funding for their rental assistance or supportive services is discontinued.

***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, tenant-based rental assistance, and affordable and permanent supportive rental housing:***

The City and County of Honolulu receives annual allocations of federal funding through the Community Development Block Grant (CDBG) program, the HOME Investment Partnerships (HOME) program, the Emergency Solutions Grant (ESG) program, and the Housing Opportunities for Persons with AIDS (HOWPA) program. The City also receives an allocation of 50% of the State's share of the Housing Trust Fund (HTF) through the Hawaii Housing Finance and Development Corporation (HHFDC). Funds are allocated and contracted in accordance with the priority needs identified in the City's Consolidated Plan, including affordable housing, homelessness, public facilities and improvements, public services, and community/economic development. HUD Continuum of Care (CoC) funds for people experiencing homelessness are administered by Partners in Care, the Continuum of Care for the City and County of Honolulu.

The City administers several housing assistance programs for low-income households, including the Housing Choice Voucher (HCV) program, Rent-to-Work (RTW) program, HUD-Veterans Affairs Supportive Housing (HUD-VASH) program, Family Unification Program (FUP), Mod Rehab program, Mainstream vouchers, and Emergency Housing Voucher (EHV) program. The City also maintains a portfolio of 64 Special Needs Housing projects for people experiencing homelessness, people with disabilities, older adults, and low- and moderate-income households. The City's Office of Economic Revitalization also administers the Rent and Utility Relief Program (RURP), designed to prevent eviction due to the economic impacts of COVID-19. The program has assisted over 15,000 households with more than \$210 million in rent and utility payments. The program is on track to expend all allocated funds.

The City appropriates approximately \$13.9 million annually in General Funds for various homeless services, including Housing First, Hale Mauiola navigation center, Punawai Rest Stop and clinic, Landlord Engagement Program (LEP), Outreach Navigation Program (ONP), and transportation assistance. The City also provides approximately \$700,000 in matching funds for the ESG program, which supports shelter services and operations, street outreach, rapid rehousing, homelessness prevention, and HMIS. The City partners with the State to administer the Homeless Outreach and Navigation to the Unsheltered (HONU) program, a mobile shelter and triage center designed to provide safe places for people to stay while seeking traditional shelter. The State provides additional Housing First funding for specialty projects, including elderly, domestic violence, LGBTQ+ chronically homeless, young adults, and tiny homes.

Since May 2020, the City has also activated an additional \$25.6 million in Emergency Solutions Grant – Coronavirus (ESG-CV), \$14.4 million in Community Development Block Grant – Coronavirus (CDBG-CV), and \$95,000 in Housing Opportunities for Persons with AIDS –

Coronavirus (HOPWA-CV). The City was awarded Congressionally Directed Spending for several projects in the FY22 and FY23 budgets, including \$2.3 million to acquire an apartment building for domestic violence survivors, \$2.5 million for the Crisis Outreach Response and Engagement (CORE) program, \$3.9 million for behavioral health observation and stabilization beds, and \$13 million for tiny home villages.

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

Based on the number of people experiencing homelessness during the 2022 PIT Count, the number of units in the HIC, and data from the HHPS, an additional 2,442 individual and 750 family units are needed to address the current levels of unsheltered homelessness (Table 2.) This calculation factors in the estimated rate of inflow through existing CES resources, which was identified as approximately 19% in the HHPS. Within the additional units needed, the characteristics of the units must also be aligned with community needs. Input from homeless service providers stressed the importance of non-congregate shelter options, as well as shelters that accommodate people with pets, adult-only families, older adults, and people with higher level of care needs. Furthermore, providers noted that many people experiencing homelessness prefer to remain in their communities and will not seek shelter or housing in other parts of Oahu.

While CES provides a centralized access point for thousands of housing resources, the system is limited by available inventory and capacity. Individuals and families are assessed for housing resources based on their vulnerability, but the system cannot guarantee that a housing resource will immediately be available. Furthermore, CES is unable to accommodate all preferences and may refer households to a housing resource that they do not want. Finally, many individuals with acute needs require a level of support that cannot be met by existing housing options within CES.

Households at-risk of homelessness face challenges when seeking resources in the homeless service system. Most resources are prioritized for people experiencing literal homelessness, limiting the options available for people facing housing instability. The City is also concerned that the ending of the RURP will result in an unmet need for eviction prevention assistance, as service providers who previously administered these types of programs experienced low demand while the RURP and the eviction moratorium were active.

Across all qualifying populations, the need for truly affordable housing was cited. The lack of affordable housing inventory affects both the unsheltered and sheltered homeless populations, as well as the population of households at-risk of homelessness. Increasing the availability of housing will create additional pathways out of homelessness for households with the ability to pay affordable rent prices and will offset some of the inflow into homelessness for at-risk households struggling with housing costs.

Additionally, non-profit agencies continue to struggle with staffing shortages and capacity limitations caused by workforce constraints and economic challenges. Many homeless service providers reported losing staff to other sectors with more competitive pay, resulting in a loss of institutional knowledge and client rapport. In some cases, staffing shortages may contribute to timeliness and compliance issues with funders.

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

The City will not further identify “other populations” within the qualifying populations already outlined.

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

The City understands that the primary focus of HOME-ARP is to meet the needs of households who are currently homeless or at-risk of homelessness. The City will reflect this priority in its solicitation(s) for HOME-ARP projects.

Increasing affordable housing inventory is a priority need across all four qualifying populations. For people experiencing literal homelessness and those fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking, additional non-congregate sheltering is also critical. Importantly, all households in shelters or other temporary living arrangements must have pathways to safe and sustainable permanent housing.

TBRA and supportive services may support permanent housing pathways and increase retention of housing. It is important that the City and providers recognize the system-level capacity limitations that impact the effectiveness of TBRA and supportive services, including low rental housing inventory and provider staffing challenges.

Additional comments on the proposed HOME-ARP funding allocations for each eligible category are provided below:

#### ***Administration and Planning***

The City intends to allocate the allowable 15% of its total HOME-ARP award toward Administration and Planning activities necessary to administer and monitor the HOME-ARP program.

#### ***Acquisition, Production, or Rehabilitation of Affordable Rental Housing***

The City intends to allocate \$8,202,295 to the acquisition, production, or rehabilitation of affordable rental housing. This allocation will help address some of the urgent needs for additional housing inventory across all eligible HOME-ARP populations, especially the preferred subpopulations of households meeting the McKinney-Vento definition of homelessness, including homeless households comprised of elderly household members and households fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking. The creation of additional housing units may also benefit other HOME-ARP eligible populations who are not identified in the City’s preferences. Furthermore, construction or rehabilitation efforts are suited to non-recurring funding streams, such as HOME-ARP.

#### ***Supportive Services***

The City intends to allocate \$1,250,000 toward supportive services that will assist eligible HOME-ARP populations with obtaining and maintaining permanent housing. This allocation will help address existing service gaps for eligible HOME-ARP populations, including households



who need case management or housing navigation services outside of existing resources. The City will work with the provider(s) selected to perform these supportive services to ensure that there is sufficient transition planning for the eventual ending of the HOME-ARP program.

### *Tenant-Based Rental Assistance*

The City does not intend to allocate any HOME-ARP funds toward TBRA. The City seeks to accomplish housing assistance efforts through other HOME-ARP eligible activities, including the acquisition, production, or rehabilitation of affordable rental housing and supportive services. At this time, the City continues to use other funds, including State and Local Fiscal Recovery Funds, to provide temporary rental assistance to households at risk of eviction. The City also allocates regular HOME funds to the provision of TBRA to certain qualifying populations. Homelessness prevention activities, such as short-term eviction prevention assistance, are eligible for funding under other programs, such as the Emergency Solutions Grant program. The City is concerned that the lack of housing inventory may continue to create barriers for people using TBRA vouchers, and the non-recurring nature of HOME-ARP funding may present challenges for households who continue to require financial assistance at the end of the program.

### *Acquisition and Development of Non-Congregate Shelters*

The City does not intend to allocate any HOME-ARP funds toward the acquisition and development of non-congregate shelters. While shelters are an important component of the homeless service system, many providers encouraged the City to support additional permanent housing initiatives instead of short-term interventions. The City believes that the creation of additional affordable housing units will relieve some of the pressure on existing shelters, and will allow for better outcomes for people currently in shelters. Furthermore, HOME-ARP funds may not be used for the operational costs of non-congregate shelters.

### *Non-Profit Operating and Capacity Building*

The City does not intend to allocate any HOME-ARP funds toward non-profit operating and capacity building programs. Assistance to non-profits was mentioned by several respondents, including a public commenter, and the City recognizes the importance of non-profit organizations in the delivery of affordable housing, homelessness, and social service programs. The HOME-ARP program regulations state that PJs may use up to 5% of funds to pay for the operating expenses of non-profit organizations that are expected to carry out HOME-ARP activities, and another 5% of funds to pay for capacity building activities to support non-profit organizations that are expected to carry out HOME-ARP activities. At this time, the City has not selected any non-profit organizations to carry out HOME-ARP activities. To help address this need for non-profit organizations, the City has allocated \$30 million in State and Local Fiscal Recovery Funds to provide direct cash assistance to non-profit organizations impacted by the COVID-19 pandemic. This assistance is not limited to non-profit organizations who are reasonably expected to carry out HOME-ARP activities.

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

The City and County of Honolulu used a combination of data from the PIT Count, HIC, and

provider input to determine the level of need and gaps in shelter and housing inventory. Additional data was also extrapolated from the Hawaii Housing Planning Study and the Comprehensive Housing Affordability Strategy. The gaps in homeless shelter and housing resources were estimated by identifying the number of individuals currently unsheltered and estimating the outflow rate of CES using data from the HHPS. The gaps in affordable housing for households at the extremely low- and low-income AMI ranges was estimated by calculating the difference between the numbers of households with one or more housing needs and the number of units affordable to those households. The number of affordable units was derived from the number of households at the 30% and 50% AMI ranges who were not considered cost burdened. A summary of the gaps in shelter and housing inventory are provided in Tables 3 and 4.

## HOME-ARP Activities

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

The City intends to issue a Request for Proposals to distribute its funds through a competitive process. Prior to the application deadline, the City will host at least one informational session for interested applicants and will answer questions regarding the application process. Projects will be ranked and rated to assess eligibility, applicability to the City's Action Plan goals, applicant experience and capacity, etc.

Developers and housing agencies seeking to apply for HOME-ARP funds to support the acquisition, production, or rehabilitation of affordable rental housing will be encouraged to consult with organizations serving the HOME-ARP qualifying populations. Applicants may propose to pair HOME-ARP funds with other funding sources to produce affordable rental housing for a HOME-ARP qualifying population, as long as the appropriate subsidy layering and cost allocations are provided at the time of application. Affordable housing projects assisted with HOME-ARP funds must remain compliant with the HOME-ARP program for the minimum 15-year period stipulated by HUD. In addition, applicants must demonstrate that their proposed HOME-ARP rental housing projects will be completed within four years of funding commitment.

Applicants proposing to offer supportive services for HOME-ARP qualifying populations should demonstrate a deep understanding of the proposed population for their supportive service project. Applicants may propose a supportive service project that pairs with a HOME-ARP affordable housing project or a standalone supportive service project for a HOME-ARP qualifying population. Applicants must certify that the households to be served with HOME-ARP funds are not already receiving the proposed services through another program.

The City intends to solicit applications for qualifying HOME-ARP activities in accordance with the proposed funding allocations in Table 11. The City shall reserve the discretion to seek alternate HOME-ARP qualifying projects in the event of a shortfall of qualified applicants. However, the City does not intend to administer eligible activities directly.

***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:***

No portion of the City's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

***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.***

<b>Proposed Use of HOME-ARP Funding</b>		
<b>Eligible Category</b>	<b>HOME-ARP Allocation</b>	<b>Allocation Percentage</b>
Administration and Planning	\$1,668,052	15%
Acquisition, Production, or Rehabilitation of Affordable Rental Housing	\$8,202,295	74%
Supportive Services	\$1,250,000	11%
Tenant-Based Rental Assistance	\$0	
Acquisition and Development of Non-Congregate Shelters	\$0	
Non-Profit Operating and Capacity Building	\$0	
<b>Total</b>	<b>\$11,120,347</b>	

**Table 11 – Use of HOME-ARP Funding**

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

N/A

***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 City's HOME-ARP Allocation Plan was developed through consultation with a wide range of providers, community groups, and other public agencies serving HOME-ARP qualifying populations on Oahu. The City utilized a combination of data gathered by local and federal agencies to capture the approximate need across qualifying populations. In addition, the City consulted with other funders of homeless and social services to maximize the impact of HOME-ARP funding. Table 11 describes the City's proposed allocation of HOME-ARP funds across eligible categories.

The HOME-ARP consultation process identified a substantial need for affordable housing units

across all qualifying populations. Respondents generally agreed that truly affordable housing for low- and extremely low-income households was necessary to achieve long-term, sustainable progress toward preventing and ending homelessness. Increasing the available inventory of truly affordable housing will positively impact other domains, including shelters, homelessness prevention activities, and housing vouchers. Several respondents noted that the lack of rental housing inventory creates challenges for households who have housing vouchers, many of whom may be occupying shelter beds as they search for housing.

Many service providers and other groups consulted stressed the importance of wraparound supportive services to help people access and maintain permanent housing. The importance of wraparound supportive services is evidenced by the success of the City's four increments of Housing First, which provide over 300 scattered-site and project-based permanent supportive housing vouchers to chronically homeless households. Housing First is a key program for households who meet the definition of "chronically homeless" and qualify for permanent supportive housing prioritization in CES, specifically because these programs provide long-term rental subsidies and case management services. However, providers have shared that households with less acute needs may be able to be served in other permanent housing projects if wraparound supportive services were made available as needed. These services may include help with annual income recertifications, navigating landlord-tenant issues, assistance in a crisis, or infrequent check-ins. HOME-ARP funds may be able to address this system gap and improve housing access and retention for homeless households across the CoC, including households who receive housing through HOME-ARP assisted units.

The City intends to allocate approximately 90% of HOME-ARP funds, excluding administrative costs, to the acquisition, production, or rehabilitation of affordable rental housing for qualifying populations. The remaining funds will be allocated toward supportive services.

The City does not intend to allocate any HOME-ARP funds toward non-congregate shelters, TBRA, or non-profit operations or capacity building. Additionally, the City does not intend to identify preferred qualifying populations or subpopulations. The City may support non-congregate shelters, TBRA, and non-profit assistance activities with other funding sources, including Congressional earmarks, State and Local Fiscal Recovery Funds (SLFRF), and City General Funds.

## **HOME-ARP Housing Production Goals**

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

The City estimates that HOME-ARP funds will support the production of up to 29 affordable rental housing units for qualifying populations. The projected number of new units is calculated based on an estimated production cost of \$250,000 - \$300,000 per unit. For comparison, the average cost of new unit construction on Oahu is approximately \$600,000 per unit. The City expects that qualifying projects will demonstrate cost effectiveness through several methods:

- Leveraging other federal and local funds to support housing construction and infrastructure development.

- Soliciting private sector and philanthropic contributions.
- Exploring opportunities to acquire or renovate existing housing units at a lower cost than new construction.

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

The City intends to competitively solicit proposals for affordable rental housing projects meeting HOME-ARP criteria. Because the City intends to prioritize affordable rental housing projects for people exiting homelessness, this use of HOME-ARP funds will directly address the City's Project Year 2020 – 2025 Consolidated Plan priority needs of both Affordable Housing and Homelessness. The City seeks to incentivize projects that deliver rental housing units at below-market construction costs by leveraging other sources of funding wherever possible. By leveraging other funding sources, the City anticipates that the final number of affordable rental housing units supported with HOME-ARP can be increased.

Increasing the inventory of affordable rental housing for qualifying populations will directly benefit the City, the CoC, and other stakeholders serving qualifying populations. The production of set-aside units will offer additional permanent housing opportunities for the City's most vulnerable community members, while ensuring that people already living in shelters or other temporary housing options have permanent pathways out of homelessness.

## 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 and County of Honolulu does not intend to give preference to any qualifying populations or subpopulations.

***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:***

- ***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.***

N/A

## 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 HOMEARP 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.***
- ***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.***
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
- ***State that 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.***

This section is not applicable to the City and County of Honolulu. The City does not propose to use HOME-ARP to refinance existing debt.

## **APPENDIX A**

City and County of Honolulu

Notice of Public Hearing  
Posted September 6, 2022

**NOTICE OF PUBLIC HEARINGS**  
(for consultation on housing needs)

Pursuant to 24 Code of Federal Regulations Part 91, notice is hereby given that the State of Hawaii (State); Department of Business, Economic Development and Tourism; Hawaii Housing Finance and Development Corporation (HHFDC), will prepare an Annual Action Plan (AAP) for Program Year 2023-2024 (PY2023), as part of the Consolidated Plan (CP) process. In preparation for this AAP, HHFDC will consult with local governments and residents at public hearings to be held in each county. In the City & County of Honolulu (City), HHFDC will conduct virtual and in-person hearings with the City's Department of Budget and Fiscal Services and Department of Community Services as follows:

**Virtual Public Hearing:**

Tuesday, September 20, 2022 at 1:00 p.m.

Connectivity information on attending the virtual public hearing can be accessed as follows:

**Join on your computer or mobile app:** [Click here to join the meeting](#)

**Or call in (audio only):** [+1 808-829-4853, Phone Conference ID: 881610447](#)

**In-Person Public Hearing:**

Thursday, September 22, 2022 at 1:00 p.m. at HHFDC's Board Room, 677 Queen Street, Suite 300, Honolulu, Oahu

The CP's purpose is to ensure that jurisdictions receiving federal assistance plan for the housing and related needs of low- and moderate-income families in a way that improves the availability and affordability of decent, safe, and sanitary housing in suitable living environments. To receive funding under certain U.S. Department of Housing and Urban Development (HUD) programs, the State must have a housing strategy that has been approved by HUD.

The State and City's AAP will describe funding plans for the coming program year and certifies program compliance with the CP, HOME Investment Partnerships (HOME), National Housing Trust Fund (HTF), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA) programs. The City's AAP will also include its Community Development Block Grant (CDBG) program.

In addition to the PY2023 AAP, the City will cover its Consolidated Annual Performance and Evaluation Report (CAPER) for Program Year 2021-2022 (PY2021), which describes its accomplishments during PY2021. A copy of the draft CAPER will be posted to the City's website, on or before September 9, 2022, at <http://www.honolulu.gov/cdbg>. A hard copy of the draft CAPER will be made available upon request by emailing [bfscdbgmil@honolulu.gov](mailto:bfscdbgmil@honolulu.gov). Interested parties may submit written comments on the City's draft CAPER by September 26, 2022 to the City and County of Honolulu, Department of Budget and Fiscal Services, Federal Grants Unit, 925 Dillingham Boulevard, Room 240, Honolulu, Hawaii, 96817 or by email to [bfscdbgmil@honolulu.gov](mailto:bfscdbgmil@honolulu.gov). The final CAPER will be submitted to HUD on or before September 30, 2022.



For PY2023, the State anticipates receiving approximately \$3,000,000 in HOME funds, \$450,000 in ESG funds, and \$250,000 in HOPWA funds, for use primarily in the counties of Hawaii, Kauai, and Maui. Approximately \$3,000,000 is anticipated under the HTF program, which may be used in the counties of Hawaii, Kauai, Maui, and the City and County of Honolulu. These HUD programs provide funding to expand the supply of affordable housing for low- and moderate-income families, reduce homelessness, and provide preventative programs and activities for homeless families and individuals in the State. Information on the City's programs can be found on its website at <http://www.honolulu.gov/cdbg>.

An Informational Packet describing the HOME, HTF, ESG and HOPWA programs is posted on HHFDC's website at <http://hawaii.gov/dbedt/hhfdc> and are available for public viewing at the following public libraries: Hilo, Island of Hawaii; Lihue, Island of Kauai; Kahului, Island of Maui; Kaimuki, Kaneohe, Pearl City, Hawaii State Library's Documents Center, and UH Library's Serials Receiving, Island of Oahu. A copy may also be picked up at the agencies listed below between the hours of 7:45 a.m. and 4:30 p.m. from Monday through Friday (except for weekends and State holidays).

**AGENCIES:**

HHFDC, 677 Queen Street, Suite 300, Honolulu, Oahu

City and County of Honolulu  
Department of Budget and Fiscal Services, Federal Grants Unit  
925 Dillingham Boulevard, Room 240, Honolulu, Oahu

Department of Community Services  
925 Dillingham Boulevard, Room 200, Honolulu, Oahu

To receive a copy by mail, interested persons may call (808) 587-0634; neighbor island county residents may call toll free, extension 70634:

From Kauai: (808) 274-3141

From Maui: (808) 984-2400

From Molokai/Lanai: 1-800-468-4644

From Hawaii: (808) 974-4000

Interested persons are invited to attend the hearings and state their views, orally or in writing, related to the housing and homeless needs to be considered in developing the State's and/or the City's AAPs, and on the City's CAPER.

Please make five copies of written testimony available to the presiding officer at the hearing. Written testimony may also be submitted via email to [hhfdc consolidated plan@hawaii.gov](mailto:hhfdc consolidated plan@hawaii.gov), by U.S. mail to HHFDC, 677 Queen Street, Suite 300, Honolulu, Hawaii, 96813, or by fax to (808) 587-0600 by 4:30 p.m. on or before the day of the hearing. Written testimony on the City's AAP or CAPER may be sent to the City and County of Honolulu, Department of Budget and Fiscal Services, Federal Grants Unit, 925 Dillingham Boulevard, Room 240, Honolulu, Hawaii, 96817 or by email to [bfsedbmail@honolulu.gov](mailto:bfsedbmail@honolulu.gov). Comments and testimony received will be considered in preparing the State's and City's final AAPs and the City's final CAPER. Written testimony and comments on the City's draft CAPER must be received by September 24, 2022.

If access or communication assistance and/or services (e.g., large print, taped materials, sign language interpreter, or translator) are required to participate in this public hearing, please contact the HHFDC's Human Resources Office at (808) 587-0501, by email at [hhfdchr@hawaii.gov](mailto:hhfdchr@hawaii.gov), by fax at (808) 587-0600, or by written request at least ten business days before the hearing. Requests for access or communication assistance may also be made by contacting the City's Department of Budget and Fiscal Services by email at [bfscdbgmail@honolulu.gov](mailto:bfscdbgmail@honolulu.gov). Prompt requests help to ensure the availability of appropriate accommodations.

HHFDC and the City do not discriminate against any person because of race, color, religion, sex, including gender identity or expression, sexual orientation, disability, familial status, ancestry, age, marital status, or HIV infection.

Denise Iscri-Matsubara, HHFDC Executive Director

September 6, 2022



**Public  
Hearings****Public  
Hearings****Public  
Hearings**

**NOTICE OF VIRTUAL PUBLIC HEARING  
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG),  
HOME INVESTMENT PARTNERSHIPS (HOME),  
EMERGENCY SOLUTIONS GRANTS (ESG),  
HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA),  
AND HOUSING TRUST FUND (HTF) PROGRAMS**

NOTICE IS HEREBY GIVEN that the City and County of Honolulu (City) will prepare an Annual Action Plan (AAP) for Fiscal Year (FY) 2024 as part of the Consolidated Plan (CP) process. Joint public hearings will be held by the City and the State of Hawaii Housing Finance and Development Corporation (HHFDC) for the CDBG, HOME, ESG, HOPWA and HTF programs. The City also anticipates additional HOME funds under the American Rescue Plan Act (HOME-ARP). The hearings will provide interested persons an opportunity to submit statements and testimony on the housing and community needs to be considered in the development of the City's AAP for FY 2024.

The purpose of the AAP is to ensure that jurisdictions receiving federal assistance plan for the housing and related needs of low- and moderate-income families in a way that improves the availability and affordability of decent, safe, and sanitary housing in suitable living environments.

Information regarding the City's programs can be found on its website at <http://www.honolulu.gov/cdbg>.

Information regarding the State's programs can be found on its website at <http://hawaii.gov/dbedt/hhfdc>.

The hearings will also provide interested persons an opportunity to submit statements and testimony on the City's draft Consolidated Annual Performance and Evaluation Report (CAPER), a review of the City's accomplishments for the most recently completed fiscal year. The CAPER for the FY ending June 30, 2022, will be submitted to HUD on or before September 30, 2022. The City's draft CAPER will be available for public review on the City's website at <http://www.honolulu.gov/cdbg> on or before September 9, 2021. A hardcopy will be made available upon request by emailing [bfscdbgm@honolulu.gov](mailto:bfscdbgm@honolulu.gov).

Interested persons are invited to attend the hearings and state their views, orally or in writing. Testimony covering the AAP and CAPER will be taken separately.

Persons unable to attend the hearings may submit their statements and testimonies by email to [bfscdbgm@honolulu.gov](mailto:bfscdbgm@honolulu.gov) or by mail to: City and County of Honolulu, Department of Budget and Fiscal Services, Federal Grants Unit, 925 Dillingham Boulevard, Room 240, Honolulu, Hawaii 96817.

The deadline to submit testimony and comments regarding the City's draft CAPER is September 26, 2022.

Information on attending the public hearings are as follows:

**Virtual Public Hearing :**

Date : September 20, 2022 (Tuesday) at 1:00 p.m.

Join on your computer or mobile app : See Notice of Public Hearing on HHFDC's website at <http://www.dbedt.hawaii.gov/hhfdc>

Or join by phone (audio only) : +1 808-829-4853,  
Phone Conference ID: 881 610 44#

**In-Person Public Hearing :**

Date : September 22, 2022 (Thursday) at 1:00 p.m.

Location : HHFDC's Board Room  
677 Queen Street, Suite 300, Honolulu, Hawaii 96813

The services of interpreters for non-English speaking persons or signers for the hearing-impaired will be made available upon request. Requests for these or other special services must be made to the Department of Budget and Fiscal Services no later than the close of business (4:30 p.m.) on September 9, 2022, by emailing [bfscdbgm@honolulu.gov](mailto:bfscdbgm@honolulu.gov).

All interested persons are invited to attend the public hearings.

Andrew T. Kawano, Director  
Department of Budget and Fiscal Services

By Order of RICK BLANGIARDI, MAYOR  
City and County of Honolulu  
(SA1385486 9/7/22)

## **APPENDIX B**

City and County of Honolulu

Notice of Public Comment  
Posted March 3, 2023

AFFIDAVIT OF PUBLICATION

IN THE MATTER OF  
PUBLIC NOTICE - HOME-ARP

STATE OF HAWAII

} SS.

City and County of Honolulu

**Doc. Date:** MAR 03 2023 **# Pages:** 1

**Notary Name:** COLLEEN E. SORANAKA **First Judicial Circuit**

**Doc. Description:** Affidavit of  
Publication

**Notary Signature:** [Signature] **Date:** MAR 03 2023

**NOTARY PUBLIC**  
**COLLEEN E. SORANAKA**  
**No. 90-263**  
**STATE OF HAWAII**

Channel Ravenna being duly sworn, deposes and says that she is a clerk, duly authorized to execute this affidavit of Oahu Publications, Inc. publisher of The Honolulu Star-Advertiser, MidWeek, The Garden Island, West Hawaii Today, and Hawaii Tribune-Herald, that said newspapers are newspapers of general circulation in the State of Hawaii, and that the attached notice is true notice as was published in the

Honolulu Star-Advertiser 1 times on:  
03/03/2023

MidWeek 0 times on:

The Garden Island 0 times on:

Hawaii Tribune-Herald 0 times on:

West Hawaii Today 0 times on:

Other Publications: 0 times on:

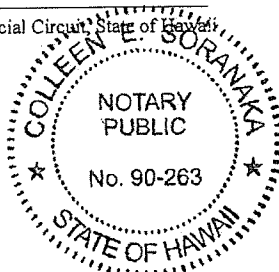
And that affiant is not a party to or in any way interested in the above entitled matter.

Channel Ravenna

Subscribed to and sworn before me this 3 day of March A.D. 2023

Colleen E. Soranaka, Notary Public of the First Judicial Circuit, State of Hawaii  
My commission expires: Jan 06 2024

Ad # 0001407291



PUBLIC NOTICE

HOME INVESTMENT PARTNERSHIPS AMERICAN RESCUE PLAN  
(HOME-ARP) PROGRAM  
HOME-ARP ALLOCATION PLAN

NOTICE IS HEREBY GIVEN that the City and County of Honolulu's (City) Draft HOME-ARP Allocation Plan is available to the public for a fifteen (15) day public comment period. The City was allocated \$11,120,347 in HOME-ARP funds in a one-time funding special allocation from the U.S. Department of Housing and Urban Development (HUD). The purpose of the HOME-ARP Allocation Plan is to describe how the City proposes to use HOME-ARP funding to assist individuals or households who are experiencing homelessness, at risk of homelessness, and other vulnerable populations, by providing affordable housing, rental assistance, supportive services, and/or non-congregate shelter, to reduce homelessness and increase housing stability.

Comments on the Draft HOME-ARP Allocation Plan must be received by the City at the following address on or before March 18, 2023: City and County of Honolulu, Department of Community Services, 925 Dillingham Boulevard, Room 200, Honolulu, Hawaii 96817. Attention: Community-Based Development Division. Comments may also be submitted via email at [descbdc@honolulu.gov](mailto:descbdc@honolulu.gov). Copies of the Draft HOME-ARP Allocation Plan are available for public review on the City's website at <https://hnlidoc.hawaii.gov/hnlidoc/document-download?id=16540>. Hard copies will be made available for public review upon request by emailing [descbdc@honolulu.gov](mailto:descbdc@honolulu.gov). All comments received by the deadline will be considered in preparing the Final HOME-ARP Allocation Plan.

Upon approval of the City's HOME-ARP Allocation Plan by the City Council, the Allocation Plan will be submitted to HUD as a substantial amendment to the Fiscal Year 2021 Annual Action Plan for review and acceptance.

By Order of RICK BLANGIARDI, MAYOR  
City and County of Honolulu

Anton C. Krucky, Director  
Department of Community Services  
(SA1407291 3/3/23)

ICSP NO.: \_\_\_\_\_

## **APPENDIX C**

City and County of Honolulu

Certifications

## HOME-ARP CERTIFICATIONS

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

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

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

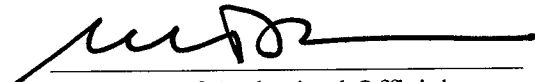
**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

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

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

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

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

  
\_\_\_\_\_  
Signature of Authorized Official

3/28/23  
\_\_\_\_\_  
Date

\_\_\_\_\_  
Managing Director

\_\_\_\_\_  
Title



## **APPENDIX D**

City and County of Honolulu

Application for Federal Assistance

Application for Federal Assistance SF-424		
<b>* 1. Type of Submission:</b> <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		
<b>* 2. Type of Application:</b> <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision		
<b>* If Revision, select appropriate letter(s):</b> <input type="text"/> <b>* Other (Specify):</b> <input type="text"/>		
<b>* 3. Date Received:</b> <input type="text"/>		<b>4. Applicant Identifier:</b> <input type="text"/>
<b>5a. Federal Entity Identifier:</b> <input type="text"/>		<b>5b. Federal Award Identifier:</b> <input type="text"/>
<b>State Use Only:</b>		
<b>6. Date Received by State:</b> <input type="text"/>		<b>7. State Application Identifier:</b> <input type="text"/>
<b>8. APPLICANT INFORMATION:</b>		
<b>* a. Legal Name:</b> <input type="text" value="City and County of Honolulu"/>		
<b>* b. Employer/Taxpayer Identification Number (EIN/TIN):</b> <input type="text" value="99-6001257"/>		<b>* c. UEI:</b> <input type="text" value="D4W7SB9CF8G4"/>
<b>d. Address:</b>		
<b>* Street1:</b> <input type="text" value="530 South King Street"/>		
<b>Street2:</b> <input type="text"/>		
<b>* City:</b> <input type="text" value="Honolulu"/>		
<b>County/Parish:</b> <input type="text"/>		
<b>* State:</b> <input type="text" value="HI: Hawaii"/>		
<b>Province:</b> <input type="text"/>		
<b>* Country:</b> <input type="text" value="USA: UNITED STATES"/>		
<b>* Zip / Postal Code:</b> <input type="text" value="96813-3099"/>		
<b>e. Organizational Unit:</b>		
<b>Department Name:</b> <input type="text" value="Budget and Fiscal Services"/>		<b>Division Name:</b> <input type="text" value="Fiscal/CIP Administration"/>
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
<b>Prefix:</b> <input type="text" value="Mr."/>	<b>* First Name:</b> <input type="text" value="Andrew"/>	
<b>Middle Name:</b> <input type="text" value="T."/>		
<b>* Last Name:</b> <input type="text" value="Kawano"/>		
<b>Suffix:</b> <input type="text"/>		
<b>Title:</b> <input type="text" value="Director of Budget and Fiscal Services"/>		
<b>Organizational Affiliation:</b> <input type="text"/>		
<b>* Telephone Number:</b> <input type="text" value="(808) 768-3901"/>		<b>Fax Number:</b> <input type="text" value="(808) 768-3179"/>
<b>* Email:</b> <input type="text" value="andy.kawano@honolulu.gov"/>		

## Application for Federal Assistance SF-424

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

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

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

U.S. Department of Housing and Urban Development

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

14-239

CFDA Title:

HOME Investment Partnerships - American Rescue Plan (HOME-ARP) Program

### \* 12. Funding Opportunity Number:

\* Title:

### 13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

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

Twenty-Seventh (27th) Year Action Plan - HOME-ARP Allocation Plan

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

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

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

Add Attachment

Delete Attachment

View Attachment

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

* a. Federal	<input type="text" value="11,120,347.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="11,120,347.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ \*\* I AGREE

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

**Authorized Representative:**Prefix: \* First Name: Middle Name: \* Last Name: Suffix: \* Title: \* Telephone Number: Fax Number: \* Email: 

\* Signature of Authorized Representative:



\* Date Signed:

## **APPENDIX E**

City and County of Honolulu

Assurances – Non-Construction Programs

# HOME Investment Partnerships - American Rescue Plan (HOME-ARP) Program

OMB Number: 4040-0007

Expiration Date: 02/28/2025

## ASSURANCES - NON-CONSTRUCTION PROGRAMS

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


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

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

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

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Managing Director
APPLICANT ORGANIZATION City and County of Honolulu	DATE SUBMITTED 3/28/23

## **APPENDIX F**

City and County of Honolulu

Assurances – Construction Programs



## ASSURANCES - CONSTRUCTION PROGRAMS

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

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

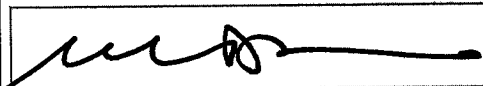
**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

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

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

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

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

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Managing Director
APPLICANT ORGANIZATION City and County of Honolulu	DATE SUBMITTED 3/28/03