

**Jefferson County, Alabama’s
HOME-ARP ALLOCATION PLAN**

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I. PURPOSE AND SCOPE OF THIS HOME-ARP ALLOCATION PLAN

The American Rescue Plan (ARP), enacted on March 11, 2021, provides \$5 billion to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability across the country. These grant funds will be administered through HUD's HOME Investment Partnerships Program (HOME).

On April 8, 2021, HUD allocated HOME-ARP funds to 651 grantees using the HOME formula established at 24 CFR 92.50 and 92.60. The HOME-ARP regulatory requirements were released by HUD in CPD Notice 21-10, on September 13, 2021. Jefferson County, Alabama was allocated \$3,597,411 in HOME-ARP grant funding on September 24, 2021.

Jefferson County, Alabama developed this HOME-ARP Allocation Plan (HOME-ARP Allocation Plan) in accordance with The HOME American Rescue Plan and CPD Notice 21-10 to utilize HOME-ARP funds for eligible activities benefiting Qualifying Populations (QPs) in a manner which is most efficient and effective for Jefferson County, Alabama.

This HOME-ARP Allocation Plan applies only to the Jefferson County HOME-ARP funding and does not modify Jefferson County's HOME funding for any prior or subsequent year. To the extent any provision of this HOME-ARP Allocation Plan applies only to a specified period, that provision affects the HOME- ARP Allocation Plan only for the period specified. Except to the extent expressly amended by this HOME-ARP Allocation Plan, all provisions of HOME funding remain in full force effect.

II. SUMMARY OF THE HOME-ARP CONSULTATION PROCESS

The Department of Housing and Urban Development (HUD) requires that each HOME-ARP Participating Jurisdiction consult with agencies and service providers whose clientele include HOME-ARP qualifying populations. In May 2022, Jefferson County, Alabama began the process of seeking input for the development of its draft HOME-ARP Allocation Plan. Jefferson County, Alabama met with representative stakeholders from 16 different organizations in Jefferson County, Alabama serving (QPs) in accordance with CPD Notice 21-10 from the following types of organizations/entities: Continuum of Care (CoC), homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of QPs, and public private organizations that address fair housing, civil rights, and the needs of persons with disabilities. On Thursday, September 1, 2022, Jefferson County, Alabama presented at the

local Continuum of Cares' virtual meeting to collect information from stakeholders as part of the consultation process. The meeting was attended by 16 representative stakeholders consulted. Jefferson County reached out to an additional 3 representative stakeholders that were non-responsive (Fairfield Housing Authority, Tarrant Housing Authority, and Leeds Housing Authority). Jefferson County, Alabama only received comments from the Jefferson County Housing Authority and One Roof.

The stakeholders provided input regarding:

1. The type(s) and location(s) of housing needed for their QPs.

Jefferson County, Alabama staff provided Need forms during the virtual and in-person meetings in addition to requesting information regarding need and other pertinent data from the stakeholders that could further support the stated needs.

Below is a list of the 16 organizations consulted.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation
One Roof	AL-500: Continuum of Care	Phone Consultation, Virtual Meeting, Email, In-Person Meeting
Jefferson County Housing Authority	Public Housing Authority	Phone Consultation, Virtual Meeting, Email
Volunteer Lawyer's Program	Non-Profit Supportive Service	Virtual Meeting
University of Alabama at Birmingham	Public University, Hospital, and Supportive Service Provider	Virtual Meeting
AIDS Alabama	AIDS/HIV and Youth Housing and Supportive Service Provider	Virtual Meeting
YWCA of Central Alabama	Domestic Violence Housing and Supportive Services Provider	Virtual Meeting

Birmingham Veteran's Administration Hospital	Veterans Hospital, Housing, and Supportive Service Provider	Virtual Meeting
Family Connection	Youth Homeless Housing and Supportive Service Provider	Virtual Meeting
Children's Aid Society		Virtual Meeting
Cooperative Downtown Ministries	Homeless Housing and Supportive Service Provider	Virtual Meeting
First Light	Homeless Housing and Supportive Service Provider	Virtual Meeting
Jefferson Blount St Clair Mental Health Authority	Mental Health Housing and Supportive Service Provider	Virtual Meeting
Youth Towers	Youth Homeless Housing and Supportive Service Provider	Virtual Meeting
The Dannon Project	Re-Entry and Youth Homeless Housing and Supportive Service Provider	Virtual Meeting
Offenders Alumni Association	Re-Entry Supportive Service Provider	Virtual Meeting
Community Action Agency of Northeast Alabama	Community Action Agency	Virtual Meeting

III. PUBLIC PARTICIPATION

To ensure broad participation and input into the development of the HOME-ARP Allocation Plan, HUD also requires that each participating jurisdiction provide opportunities for the

public to comment on the proposed HOME -ARP Plan, including the amount of HOME-ARP funds that will be received and the range of activities that the State of Alabama (State) may undertake.

Jefferson County, Alabama will provide a draft of the HOME-ARP Allocation Plan for public comment. Jefferson County, Alabama will begin the process by providing public notice that the HOME-ARP Allocation Plan is available for review at <https://www.jccal.org/Default.asp?ID=2052&pg=HOME+Program>. This public notice will be published in a newspaper of general circulation, a minority newspaper, and a Spanish language newspaper. It will be posted online at <https://www.jccal.org/Default.asp?ID=2052&pg=HOME+Program>. Copies will also be provided to the 34 participating consortium cities: Adamsville, Argo, Brighton, Brookside, Cardiff, Center Point, Clay, County Line, Fairfield, Fultondale, Gardendale, Graysville, Homewood, Hoover, Hueytown, Irondale, Kimberly, Leeds, Lipscomb, Maytown, Midfield, Morris, Mountain Brook, Mulga, North Johns, Pinson, Pleasant Grove, Sylvan Springs, Tarrant, Trafford, Trussville, Vestavia Hills, Warrior, and West Jefferson for review by the public. The date and time of a public hearing at which Jefferson County, Alabama will present a brief description of the draft HOME-ARP Allocation Plan and accept comments from the public, both orally and in writing. Jefferson County, Alabama will provide a limited number of copies of the HOME-ARP Allocation Plan for those in attendance. For a period of 15 days following the public hearing, Jefferson County, Alabama will continue to accept written comments from all interested parties regarding the draft HOME-ARP Allocation Plan. After providing the public notices, conducting the public hearing, completing the 15-day public comment period, and giving due consideration to all comments received, Jefferson County, Alabama will publish the final version of the HOME-ARP Allocation Plan at <https://www.jccal.org/Default.asp?ID=2052&pg=HOME+Program> that will be accompanied by a summary of the Citizen Participation Process and Proposed Changes and all public comments received. To finalize the HOME-ARP Allocation Plan, Jefferson County, Alabama must present the final HOME-ARP Allocation Plan for approval by the applicable state and federal authorities.

IV. NEEDS ASSESSMENT AND GAPS ANALYSIS

In accordance with HUD requirements, Jefferson County, Alabama conducted an evaluation of the size and demographic composition of qualifying populations within the State and an assessment of the unmet needs of those populations. In addition, Jefferson County, Alabama conducted research to identify any gaps within the County's current shelter and housing inventory as well as the service delivery system. Jefferson County, Alabama used current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or

services. Jefferson County, Alabama also used optional tables provided on the following pages.

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Housing Needs Inventory and Gap Analysis Table – Homeless

Project Type	Veteran Beds HH w/ Children	Youth Beds HH w/ Children	Veteran Beds HH w/o Children	Youth Beds HH w/o Children	CH Beds HH w/o Children	Year-Round Beds	PIT Count	Total Beds	Utilization Rate
ES Total	18	0	72	0	0	431	397	431	92%
OPH Total	0	0	0	0	0	64	62	64	97%
PSH Total	9	0	514	0	50	1326	1167	1326	88%
RRH Total	16	9	24	9	0	206	206	206	100%
SH Total	0	0	0	0	0	34	26	34	76%
TH Total	2	3	8	9	0	205	178	205	87%
	Sum : 45	Sum : 12	Sum : 618	Sum : 18	Sum : 50	Sum : 2266	Sum : 2036		
	Veteran Persons HH w/ Children	Youth Persons HH w/ Children	Veteran Persons HH w/o Children	Youth Persons HH w/o Children	CH Persons HH w/o Children	Persons in HH w/o Children	Total Unsheltered Persons		Current Gap
Unsheltered	0	0	27	5	109	223	342		917 Units

Data Sources Used: 2022 One Roof Housing Inventory Count (HIC) and One Roof 2022 Point in Time (PIT) Count.

Housing Needs Inventory and Gap Analysis Table – Non-Homeless

	Current Inventory: # of Units	Need: # of Households	Gap Analysis: # of Households
Total Rental Units	46,855		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	18,304		
Rental Units Affordable to HH at 50% AMI (At-Risk of Homelessness)	10,251		
0%-30% AMI Renter HH w/1 or more severe housing problems (At-Risk of Homelessness)		6,682	
30%-50% AMI Renter HH w/1 or more severe housing problems (At-Risk of Homelessness)		3,521	
Current Gaps			10,203

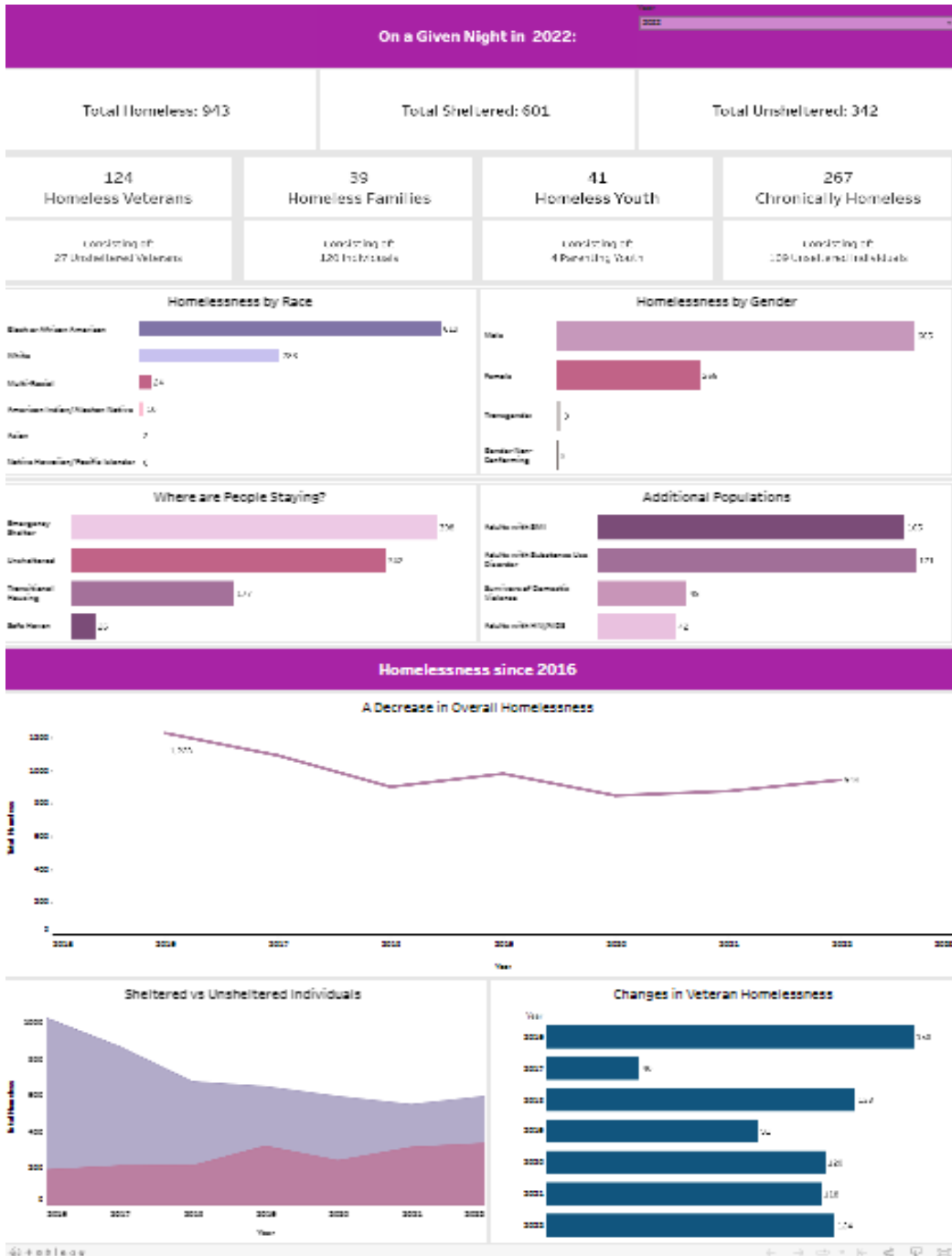
Data Sources Used: 2020 Consolidated Plan (Jefferson County, Alabama)

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Description of the size and demographic composition of qualifying populations within Jefferson County, Alabama boundaries:

1) Homeless:

During the 2022 Point in Time Count conducted by AL-500 On Roof CoC, the following demographics were identified:



2) At risk of Homelessness:

Per the 2020 Consolidated Plan data, approximately over 74.13% of households in the 0-30% Area Median Income (AMI) income category (including renters and owners) had a cost burden of over 30% as compared to 76% in the previous Analysis of Impediments (AI) to Impediment to Fair Housing, with over 60.92% having a cost burden of over 50% as opposed to 64% in the previous AI. A 30% cost burden means that a household is spending more than 30% of their gross income on housing expenses, including utilities. A 50% cost burden means that a household is spending more than 50% of their gross income on housing expenses, including utilities, and is considered a severe cost burden. Approximately 64.45% of households in the 30-50% AMI income category had a 30% cost burden as opposed to 63% in the previous AI, with 34.93% having a cost burden of over 50% as opposed to 32% in the previous AI. Approximately 50.33% of households in the 50-80% AMI category had a 30% cost burden as opposed to 44% on the previous AI, while only 15.39% had a cost burden of 50% as opposed to 12% in the previous AI.

Looking at cost burden and severe cost burden by tenure, approximately 64.47% of renter households earning less than 30% of the area median income (AMI) are paying more than 50% of their gross income on housing expenses. Approximately 45.00% of renter households earning 30-50% of (AMI) are paying more than 50% of their gross income on housing expenses.

Jefferson County, Alabama is the administrator of the Emergency Rental Assistance Program funded by the U.S. Department of Treasury for the Jefferson County (ERAP). As of June 2022, ERAP had helped 2,457 households remain in their current rental households by providing rental and utility assistance and have prevented countless evictions via its partnerships with the Jefferson County District Courts. At some point in the future, the Emergency Rental Assistance Program funds will expire, unless extended, and many of the low-income renter households may once again struggle to maintain occupancy in their rental units.

3) Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking:

According to the YWCA of Central Alabama's (YWCABham.org) 2021 Annual Report, the organization satisfied 196 emergency shelter requests providing 9,715 nights of shelter provided. Additionally, YWCA of Central Alabama's Community Housing program provided housing to 131 adults and 85 children through their seven properties inclusive of transitional and permanent housing.

4) Other Populations:

According to the Point-in-Time (PIT) Count estimates of homeless veterans at a point in time in January 2022 by the Continuum of Care (CoC) in the County, Jefferson County has 124 homeless veterans, with only 97 of those veterans sheltered and 27 veterans are homeless without any shelter.

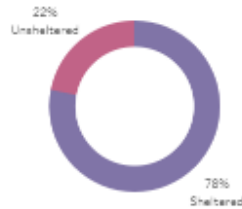
According to the PIT Count estimates of homeless youth at a point in time in January 2022 by the Continuum of Care (CoC) in the County, Jefferson County has 6 homeless youth with all sheltered.

A Detailed Look of the 2022 Veteran PIT Count

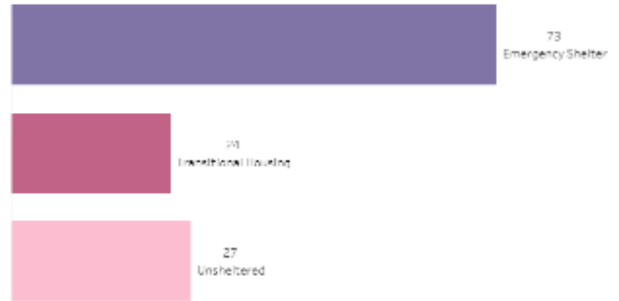
Breakdown of Homelessness by Veteran Household Type

Veteran Household Type
All

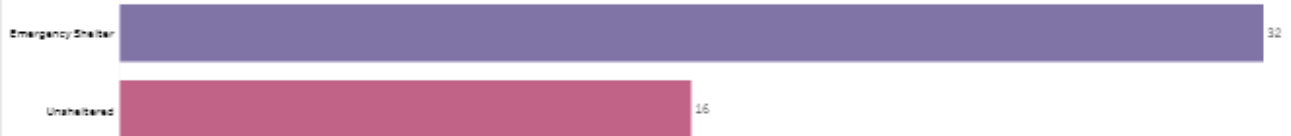
For All households, there were 124 total homeless



Where Veterans are Staying by Household Type: All Households



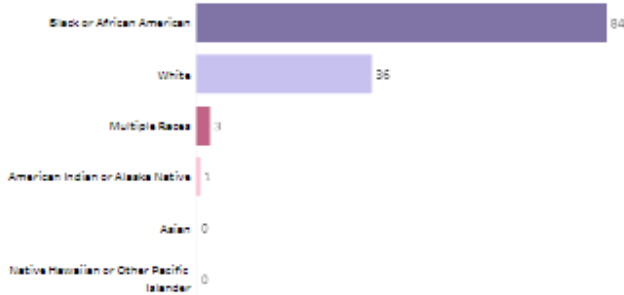
Chronically Homeless Veterans: All Households



Breakdown of Veteran Homelessness by Household Type and Shelter Type

Sheltered Type
All

Race by All Veteran Households: All Population



Gender by All Veteran Households: All Population



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

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

Based on data above, it is estimated that among those who experience sheltered and unsheltered homelessness, 917 households will require a supportive housing intervention to exit homelessness.

Jefferson County, Alabama has identified and considered the following 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:

According to the 2022 HIC and PIT Count Reports, Alabama has 431 emergency shelter, 205 transitional housing beds, and 34 safe haven beds in use. Not including COVID-related increased rental assistance programs, 206 households were in rapid rehousing programs. Additionally, there were 1,326 beds of Permanent Supportive Housing, 29 beds of Single Room Occupancy, and 35 Emergency Housing Vouchers reported in the 2022 Housing Inventory Count.

Utilizing data from 2022 HIC Reports, 35 Emergency Housing Vouchers were in use by Jefferson County PHAs.

According to the 2022 HIC data, the total number of HUD-VASH Voucher beds for Jefferson County was 523.

Identification of gaps within the current shelter and housing inventory as well as the service delivery system:

Jefferson County did not identify gaps within the current shelter inventory but rather a bottleneck that is created by an absence of both permanent supportive housing and affordable housing once a citizen exits homelessness.

Identification of 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:

HUD’s Comprehensive Housing Affordability Strategy (CHAS) reports that 11,579 Jefferson County renter households have at least 1 of 4 severe housing problems. These households lack safe, economically sustainable housing and are at increased risk of housing instability and homelessness. Therefore, households that spend more than 30% of their income and live in substandard housing are unstably housed and at risk of homelessness. A unit is substandard if it:

- a. Is dilapidated. Does not have operable indoor plumbing.
- b. Does not have a usable flush toilet inside the unit for the exclusive use of a family.
- c. Does not have a usable bathtub or shower inside the unit for the exclusive use of a family.
- d. Does not have electricity or has inadequate or unsafe electrical service.
- e. Does not have a safe or adequate source of heat.
- f. Should, but does not, have a kitchen.
- g. Has been declared unfit for habitation by an agency or unit of government.

2) Other definitions-

- a. Dilapidated unit. A housing unit is dilapidated if:
 - i. The unit does not provide safe and adequate shelter, and in its present condition endangers the health, safety, or well-being of a family; or
 - ii. The unit has one or more critical defects, or a combination of intermediate defects in sufficient number or extent to require considerable repair to rebuilding. The defects may involve original construction, or they may result from continued neglect or lack of repair or from severe damage to the structure.

Identification of priority needs for qualifying populations:

The Needs Inventory and Gaps Analysis, and input from the organizations that participated in the consultation process with Jefferson County, Alabama, clearly confirms that there is an undersupply of available affordable housing for qualifying populations. Information collected during the HOME-ARP consultations revealed the following immediate needs for vulnerable populations:

One Roof (CoC) – homeless populations:

1. Affordable Housing Development
 - a. Jefferson County has a severe lack of affordable housing that is available, decent, and safe. Lack of affordable housing remains the largest gap in services for qualifying households in Jefferson County. Developing new affordable housing units aligns with the CoC/County’s long-term housing strategy. On average, it takes qualifying households an average of 44 days to locate and move into appropriate housing units through existing housing programs. This can be reduced with additional affordable housing units in Jefferson County.
 - b. Eligible Housing: manufactured/modular housing, single room occupancy, permanent supportive housing.
 - c. New Construction, acquisition, or Rehab.
 - d. Utilization of Coordinated Entry (CE) to fill units with qualifying households.
 - e. Proposal to develop 10-15 units of new affordable housing.
2. Capacity Building Activities for Nonprofits (5%)
 - a. Capacity Building support and activities are necessary for nonprofit agencies to carry out eligible HOME-ARP activities. Investing in long-term capacity building will strengthen agencies’ ability to competitively apply for HOME-ARP funds and other housing development funds in the future.
 - b. A secondary benefit and outcome of investing in capacity building will be an increase in agencies’ ability to implement other federal supportive housing programs such as those funded through the ESG and CoC grant programs.
3. Supportive Services (only in combination with the above listed strategies)
 - a. With the development of new affordable housing units and NCS, there will be a small need for supportive services, even if just temporary, to stabilize qualifying households who do not otherwise have supportive services through another grant program.
 - b. Highest priorities for supportive services: case management, financial assistance (security/utility deposits, initial move in costs, etc.), outreach, transportation, and mental health services.

Jefferson County Housing Authority – PHA

1. Affordable Housing Development

- a. Jefferson County has a severe lack of affordable housing that is available, decent, and safe. Lack of affordable housing remains the largest gap in services for qualifying households in Jefferson County.
- b. Specifically, rehabilitation of the County’s existing public housing and reconstruction of units that could not be rehabilitated to fill with qualifying households.
- c. Developing new affordable housing units to fill with qualifying households with a particular focus on senior households.

Even when homeless and/or at-risk households have access to resources like rental assistance vouchers, emergency rental assistance, or supportive services, many of them are unable to find an available apartments that they can afford. This has been exacerbated by the consolidation of apartment management companies.

Explanation regarding how the level of need and gaps in shelter and housing inventory and service delivery systems statewide were determined based on the data presented in the plan.

Jefferson County, Alabama utilized data available in the CHAS, the 2022 PIT Count Report, the 2022 Continuum of Care Housing Inventory Count Report, and the American Communities Survey to ascertain the number of individuals experiencing homelessness. Additionally, Jefferson County, Alabama consulted the representative stakeholders and service providers who provided insight into the specific characteristics relative to the production of affordable housing that will best serve the homeless qualifying populations they serve.

V. HOME-ARP ACTIVITIES

The following is a description of the methods used by Jefferson County, Alabama for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether Jefferson County, Alabama will administer eligible activities directly:

Jefferson County, Alabama will utilize HOME-ARP funds to fund competitive applications until all HOME- ARP funds are awarded to the development of new construction of affordable rental housing units and fund Operating and Replacement Reserve Accounts for the benefit of HOME-ARP Qualifying Populations. All new construction rental housing will be required to meet AHFA’s current Design Quality Standards and Construction Manual. Jefferson County, Alabama may consider Housing Credits, HOME, and/or National Housing Trust Fund Allocations in combination with HOME-ARP funds to maximize the number of units produced and strengthen the financial feasibility of affordable rental projects.

Each application must consist of the following primary team members: An owner/developer with extensive construction/development and affordable housing experience; an experienced representative non-profit or other entity representing or advocating for the needs of a specific qualifying population group, and an experienced supportive services entity/provider for the ongoing support of the designated qualifying population group.

In addition, the primary team members must evidence a clearly defined management plan from the initial application submittal throughout the life of the project. Specifically, the primary team must submit a detailed plan which includes/identifies all or key members of the project’s development,

management, and services teams and provide supporting documentation regarding team members' experience, capacity, roles, responsibilities, and other information deemed necessary to successfully execute the development, manage the property, and serve the QP beneficiaries for the duration of the compliance period(s). All members of the HOME-ARP project team must be identified in the application and applicable service agreement(s) and/or Memorandum(s) of Understanding (MOUs) evidenced.

All applications must include the following project amenities:

- Washer/Dryer provided in each unit (3-7 cu. ft. capacity. Washer must be Energy Star rated.)
- Completely furnished Apartment Unit (all Qualifying Population Units). The apartment must include the following:
 - Living Area (sofa, chair or loveseat and side table or coffee table), Kitchen or Dining Area (table and 4 chairs), Bedroom(s) (bed, dresser, and nightstand).

Priority will be given to projects that demonstrate excellence/highest proficiencies in collaborative efforts (joint ventures), cost efficiencies, leveraging, affordable housing experience, and comprehensive, sustainable, and cost-efficient supportive services for QPs. Bonus points will be provided to applications inclusive of Public Housing Authorities. See the scoring details outlined in the Exhibit F-1: Point Scoring.

The instructions will be posted at

<https://www.jccal.org/Default.asp?ID=2052&pg=HOME+Program> prior to the beginning of the application cycle. Jefferson County, Alabama will post these forms as they become available, and applicants should regularly check

<https://www.jccal.org/Default.asp?ID=2052&pg=HOME+Program> to begin work on the required forms as soon as possible. All Jefferson County, Alabama-provided forms should be completed pursuant to instructions, legible and with all applicable spaces fully completed.

Jefferson County, Alabama will not award any portion of Jefferson County, Alabama HOME-ARP administrative funds to a subrecipient or contractor.

	Funding Amount	Percent of the Grant Statutory Limit
Development of Affordable Rental Housing	\$3,057,799.35	85%
Administration and Planning	\$ 539,611.65	15%
Total HOME-ARP Allocation	\$3,597,411.00	100%

Jefferson County, Alabama will allocate 85% of its total grant to the development of affordable rental housing. As noted, service providers indicated to Jefferson County, Alabama the dire need for units to house their clients. Jefferson County, Alabama will use HOME-ARP funds to pay for development hard costs (defined in 24 CFR 92.206(a), related soft cost (defined in 24 CFR 92.206(d) and operating cost assistance (defined in CPD Notice 21-10).

Description of 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 the following eligible activities:

The available data from the 2022 Housing Inventory Count and the 2021 PIT Count in combination with the first-hand knowledge and experiences shared by homeless service providers in Jefferson County make apparent the lack of affordable housing units available to assist populations who are homeless or at risk of homelessness. In Jefferson County, these populations are inclusive of all Qualifying Populations as defined in the HOME-ARP program.

Further, the service providers reported having sufficient funding sources to provide supportive services and to assist with housing of clients. The consistent problem is the lack of appropriate and available housing, which results in utilizing hotel rooms in cases where that is possible, or unsheltered families and individuals. According to service providers, affordable rental units are the preferred type of housing for the QPs they serve.

Jefferson County's HOME-ARP Allocation Plan will focus on incentives to construct affordable rental units in collaborative developments that include experienced affordable housing developers, managers, owners, and service providers.

VI. HOME-ARP PRODUCTION HOUSING GOALS

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

Jefferson County, Alabama estimates producing and supporting between 6 and 15 affordable rental housing units for qualifying populations and will provide available resources toward costs to: a) acquire land and construct housing units, and b) establish operating reserve accounts for each project's 20- year compliance period.

Jefferson County, Alabama will use 85% of the total HOME-ARP funding for the construction and development of new affordable rental housing units. Approximately 70% of that funding will be used for eligible project hard and soft costs. Jefferson County, Alabama will determine the reasonableness of eligible project costs by comparing aggregate cost data based on all applications received, historical cost certification, cost data of completed projects, and current cost data provided by Jefferson County, Alabama internal construction estimates. Any line item costs, square footage costs or total unit costs exceeding a range of reasonableness may be disallowed at the determination of Jefferson County, Alabama. Additional information and documentation (verified by Jefferson County, Alabama and/or an Jefferson County, Alabama third-party consultant) may be required to substantiate the reasonableness of the cost, including without limitation information regarding proposed costs that significantly exceed Jefferson County, Alabama minimum Design Quality Standards and Construction Manual. Any allocation of HOME-ARP funds will be

determined using Jefferson County’s assessment of cost and overall application feasibility. The remaining 30% of that funding will be used to support the affordable rental housing unit for qualifying populations by capitalizing an operating cost assistance reserve. Project operating costs will be established by using historical Jefferson County, Alabama funded projects operating costs.

Description of the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ’s following priority needs:

Jefferson County, Alabama will utilize HOME-ARP funding to produce new construction affordable rental units for the benefit of Qualifying Populations in Alabama. The scoring priorities will incentivize applicants to partner with experienced affordable housing developers and supportive services providers in order to provide quality affordable housing units with amenities and good locations throughout the County.

Preferences

Jefferson County, Alabama will not give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

Additionally, Jefferson County, Alabama will not identify a preference or use a preference or method of prioritization to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ’s needs

Last, Jefferson County, Alabama will not identify a preference(s) to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference.

VII. HOME-ARP REFINANCING GUIDELINES

Jefferson County, Alabama will not provide HOME-ARP refinancing guidelines under its Jefferson County, Alabama HOME-ARP Allocation Plan and will not use the funds for that purpose.

Exhibit F-1

Jefferson County Alabama's HOME-ARP Point Scoring System

WITHOUT LIMITING ANY OTHER PROVISION OF THIS PLAN, ALL DETERMINATIONS, CALCULATIONS, JUDGMENTS, ASSESSMENTS OR OTHER DECISIONS MADE BY JEFFERSON COUNTY, ALABAMA UNDER THIS HOME-ARP ALLOCATION PLAN, INCLUDING WITHOUT LIMITATION RELATED APPLICATION INSTRUCTIONS AND THE HOME-ARP ALLOCATION PLAN ITSELF, SHALL BE MADE IN JEFFERSON COUNTY, ALABAMA'S SOLE AND ABSOLUTE DISCRETION.

The point scoring system described in this Exhibit and related provisions of the HOME-ARP Allocation Plan (collectively, the Point Scoring System) will allow Jefferson County, Alabama to award points to projects that best meet the identified housing priorities for Jefferson County, Alabama. The Point Scoring System will rank each project in two sections (Points Gained and Points Lost). The ranking of each project will be determined by taking the Points Gained section and deducting the Points Lost section to get an overall project score. The Point Scoring System will largely determine which projects should be allocated.

In the event of a tie between two or more applications, the projects will be ranked in the following order to determine which application will receive the following priority:

First, the application serving a QP population that has not been previously recommended for approval. Second, the application with the fewest missing documents and incomplete forms as determined by Jefferson County, Alabama during the completeness review.

Third, the application with the highest amount of subsidy funding per unit from sources other than HOME- ARP funds, excluding other Jefferson County, Alabama funding sources.

Jefferson County, Alabama reserves the right to deny an allocation of HOME-ARP funds to any applicant or project, regardless of that applicant's point ranking if, in Jefferson County, Alabama's determination, the applicant's proposed project is not financially feasible or viable. Additionally, Jefferson County, Alabama may recommend that a HOME-ARP allocation be made irrespective of the ranking order established by the Point Scoring System, based on the amount of HOME-ARP funds needed relative to the amount of HOME-ARP funds available for the project to be financially feasible.

Regardless of strict numerical ranking, the Point Scoring System does not operate to vest in an applicant or project any right to a reservation or allocation of HOME-ARP funds in any amount. Jefferson County, Alabama will in all instances reserve and allocate HOME-ARP funds consistent with sound and reasonable judgment, prudent business practices and the exercise of its inherent discretion.

POINTS GAINED

Project Characteristics (Maximum of 108 Points)

Project Construction (Maximum of 38 Points)

Project Amenities (Maximum of 30 Points)

A maximum of 30 points in aggregate will be given to projects that provide extra unit/project amenities. Refer to the application and its instructions for the distinction between an extra amenity and a required amenity. Only the extra amenities listed below will be eligible for points. If a project receives an allocation of HOME-ARP funds and fails to provide any extra amenity in the manner represented in the Application Package, the project and its Responsible Owners will be subject to point penalties and other sanctions.

5 Points will be given for each of the following extra amenities:

- Project Community Building/Community Room/Tenant Service Center (Must have at minimum a kitchen (with refrigerator/freezer, cabinets, and a sink with counter space), community meeting room (with seating and activity areas commensurate to total number of units) and restrooms.

Note: If project is solely financed by HOME-ARP funds, the Community Building/Community Room/Tenant Service Center must have a Qualifying Population unit attached.

- Exterior Project Security Package Must include, at a minimum, the following:
 - Alarm (sound and/or third-party monitored) system at the clubhouse/ community building, resident manager's office, and laundry.
 - Camera/Video monitoring system to provide visibility of all pedestrian and vehicular traffic of all main Project entry and exit points, parking lot and Project amenities.
 - Lighting of all project amenities, parking lot(s), and all Project entry and exit points.
- Unit Security Package (Each unit must have an alarm on all entry doors and windows)
- Storm Shelter (Must meet the International Code Council National Storm Shelter Association Standard for the Design and Construction of Storm Shelters (ICC-500 August 2008) Standards)
- Outdoor Fitness Activity Area (Must provide 3 separate types of commercial grade outdoor fitness equipment with a minimum of 3 exercise activities. An instructional sign on the usage of fitness equipment must be located by each type of fitness equipment)

4 Points will be given for each of the following extra amenities:

- Covered bus stop shelter (minimum 6' wide by 12' long) with 2 fixed bench seating underneath same cover (Must be separate/independent of the mail kiosk unless location allows for proper access of bus to pick-up and drop off)
- Access Gate (Must be on all entry points of project if more than one)
- Walking Trail with Benches (5 feet wide concrete and minimum of ¼ of mile long) (Must be separate from required sidewalks)
- Playground (Must provide commercial grade playground equipment with a minimum of 3 play activities)

3 Points will be given for each of the following extra amenities:

- Storm doors (Must be aluminum construction)
- Emergency Pull Cord/Call Button (Minimum of 1 in each unit)
- Attached bike rack (1 per building including the community building) (Rack must be permanently installed on concrete in such a way that sidewalk traffic is not impeded)

Type of Construction (Maximum of 8 Points)

4 points will be given for storm windows; thermal break insulated windows or extruded vinyl windows and insulated exterior doors. Windows must be Energy Star Rated.

4 points will be given for full brick/cementitious siding, stucco, cultured stone or concrete masonry unit (CMU) products (No Exterior Insulation Finishing System is acceptable).

Multifamily units (two or more units in a building)

A minimum of 40% of each building, defined as the exterior façade from finished grade elevation to eave line, shall be brick. The remaining 60% can be cementitious siding, stucco, or CMU products. The CMU products must be decorative, textured, patterned, color core, or painted.

All entry areas into the apartment (including covered breezeways, porches, balconies, and patios) must have brick, cementitious siding, stucco, cultured stone, or CMU to be considered full brick.

Single-family units (single unit/detached building)

A minimum of 50% of the building, defined as the exterior façade from finished grade elevation to eave line, shall be brick. Each exterior wall must contain brick up to the bottom of the first-floor windows on a two-story unit or the windowsill of a one-story unit. The remaining 50% can be cementitious siding, stucco, cultured stone, or CMU products. The CMU products must be decorative, textured, patterned, color core, or painted.

Energy/Water Conservation and Healthy Living Environment (Maximum of 10 Points)

3 Points will be given for each of the following:

- HVAC of 15 SEER (HSPF 9.0) or above.
- Energy Star rated “cool roof” shingles or metal roof with a fifty (50) year warranty.

2 Points will be given for each of the following:

- Kitchen range hood ventilation to be vented to the exterior and equipped with a damper.
- EPA’s Partnership Program “WaterSense” labeled water closet, bathroom faucets and showerheads.

1 Point will be given for each of the following:

- Low Volatile Organic Compounds (VOC) wall finishes (maximum VOC levels of 50 grams/liter).
- Low VOC flooring finishes (maximum VOC levels of 100 grams/liter).
- Energy Star rated LED lighting in the kitchen.

Rent Affordability (Maximum of 10 Points)

New Funds. A maximum of 5 points in aggregate will be given to projects which have a commitment for new funds listed below. Regardless of whether the funds are loaned (required repayment) or granted to the project, 100% of the total amount of funds committed for points must be a permanent source of funds. To qualify for these points, the application must include a fully executed firm commitment from the entity that will loan or grant funds to project. Up to 5 points will be given to projects as follows:

- 5 points – \$10,000+ per unit
- 4 points – \$5,000 – 9,999 per unit
- 3 points – \$2,000 - 4,999 per unit

Rental Assistance. A maximum of 5 points will be given to projects that have a commitment for federal, state, or local project-based and/or voucher(s) for rental assistance so that rents are affordable to ELI families.

Location (Maximum of 20 Points)

Points Gained for Site Selection

Tenant Supportive Services Location (6 Points)

6 points will be given to a project that is located within 5 miles of a supportive service provider for the project's Qualifying Populations.

Neighborhood Services (Maximum of 10 Points)

2 points will be given for each of the following neighborhood services located within 3 miles of the site. Distance will be measured by odometer from the automobile entrance of the proposed project site to the closest automobile entrance to the parking lot of the applicable neighborhood service. Duplicate neighborhood services will not be eligible for additional points. Points will only be given for the neighborhood services listed below. If Jefferson County, Alabama cannot locate a service due to incorrect directions, 1 point will be deducted for each service where incorrect directions are provided. Refer to the Application Site/Project Information Form for instructions on providing directions from site, and a general definition of services eligible for points.

1. Grocery Store
2. Pharmacy or Drug Store
3. Convenience Store
4. Bank or Credit Union
5. Hospital or Doctor Office

Census Tract Location (Maximum of 4 points)

A maximum of 4 points will be given to a project located in a Census Tract where the 2020 Estimate Tract Median Family Income from the Federal Financial Institutions Examination Council (FFIEC) Census and Demographic Data is equal to or higher than the following percentages (rounded down) of the county's 2022 (or most current year) Median Family Income published by HUD:

- 1 point – 70% to less than 80%
- 2 points – 80% to less than 90%
- 3 points – 90% to less than 100%
- 4 points – 100% or more

Points Deducted for Site Selection

Negative Neighborhood Services (No Maximum)

There is not a limit on the number of points that can be deducted for negative neighborhood services. The following deductions will be taken:

- 5 points will be deducted for applications involving any other project that is adjacent to any incompatible use listed below. Adjacent is defined as nearby, but not necessarily touching. The following list of incompatible uses is not all inclusive. (Refer to Negative Neighborhood Services as defined in the Application Instructions):

1. Junk yard or dump
2. Pig or chicken farm
3. Salvage yard
4. Processing plant
5. Wastewater treatment facility
6. Industrial
7. Distribution facility
8. Airport
9. Electrical utility Substation
10. Prison or Jail
11. Railroad
12. Solid waste disposal
13. Adult video/theater/live entertainment

*Please note: Points will not be deducted for properties located adjacent to a railroad if the noise levels are acceptable (outside noise level < 65 dB; interior noise level < 45 dB). The applicant must submit a noise level assessment with the application for points not to be deducted automatically.

If a project is not adjacent to one of the above incompatible uses, the following deductions will be taken:

2 points will be deducted for applications involving any other project that is within .3 miles of any incompatible use listed below. The list is not all inclusive:

1. Junk yard or dump
2. Pig or chicken farm
3. Salvage yard
4. Processing plant
5. Wastewater treatment facility
6. Airport

7. Prison or Jail

8. Solid waste disposal

Points will not be deducted for a prison, jail, or detention facility if it is co-located with a police station or similar law enforcement office.

Accessibility (Maximum of 2 points Deducted)

2 points will be deducted if the condition of the streets and sidewalks are unsatisfactory. The width of the streets and the difficulty of access to the proposed site will be taken into consideration.

Applicant Characteristics (Maximum of 35 Points)

Minority or Women Owned Businesses (Maximum of 10 Points)

10 points will be given to applicants with participation by minority or women owned businesses. To qualify for the points for participation of minorities or women, the application must meet one of the following requirements:

- Minorities or women have ownership in the Ownership Entity or any Responsible Owner; or
- Applicant guarantees at least 20% of the total building cost is awarded to minority- or women-owned businesses.

In all cases, the minority or female individual(s) must serve as the general partner, manager or managing member of the Ownership Entity or Responsible Owner, must have at least a 50% ownership interest in the Ownership Entity or Responsible Owner, or must have at least 50% ownership interest in the participating business to qualify for the points. These businesses include, but are not limited to, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services. The name and address of the company and the anticipated contract amount must be listed at the time of application on the form provided by Jefferson County, Alabama in the Application Package to receive the points.

Affordable Rental Housing Owner/Developer (5 Points)

5 points will be given to Ownership Entities with a Responsible Owner that currently owns and has previous successful experience in development in either of the following:

- Active Jefferson County, Alabama Projects that received a HOME Written Agreement in 2000 or later (40+ units or 2+ projects); or
- Active Non-Jefferson County, Alabama Projects that were Placed in Service in 2006 or later. The Ownership Entity must list each Non-Jefferson County, Alabama Project on the Responsible Owner's Jefferson County, Alabama Schedule of Real Estate Owned Responsible Owner may include experience gained as a Responsible Owner in another development included in the application (500+ units or 5+ projects).

All points relating to Applicant Characteristics will be awarded to the Ownership Entity identified in the application based on the characteristics of (a) for a for-profit Ownership Entity, its Responsible Owners who are individuals, and (b) for non-profit Ownership Entities, the Ownership Entity itself.

Qualifying Population Advocate (5 Points)

5 points will be given to an entity that has an established history for advocating for the specific qualifying population group proposed in the application. To qualify for the points the entity must be a Responsible Owner in the Ownership Entity proposed in the application. An affordable rental housing owner/developer may also qualify for these points if they have an established history providing for the proposed qualifying population in the application. An entity can qualify based on the experience of its board members and executive staff.

Supportive Services Provider(s) (5 Points)

5 points will be given for having a Supportive Service Provider (Providers) for which their responsibilities are clearly defined and provides ongoing services to Qualifying Population tenants in a HOME-ARP project evidenced by a Services Agreement or MOU between the Owner and the Provider which is eligible to be renewed annually for the duration of the compliance period of the HOME-ARP project. Providers must serve QP tenants in at least of one the following:

- Child Care
- Family/Independent Living Counselling
- Financial Literacy Counselling
- Food Services
- Job Training/Counselling
- Mental Health Services/Counselling
- Occupational Therapy
- Rehabilitation/Physical Therapy
- Substance Recovery/Counselling
- Transportation Services

Affordable Rental Housing Management (10 points)

10 points will be given to an applicant with an experienced managing agent of HOME funded low-income multifamily housing. This experience is defined by the highest number of units or projects (with at least 20% of the units being considered low-income) currently managed. Only those units in projects that are considered HOME funded low-income units will be counted in this total.

- 10 points = (100+ units or 2+ projects)

BONUS POINTS

10 points will be given to an applicant with an experienced public housing authority included as part of the application.

POINTS LOST (No Maximum)

In addition to the points gained, each application submitted by an Ownership Entity may be subject to point deductions. Point deductions resulting from each existing Jefferson County, Alabama-Project (approved and/or Placed in Service) will be based on Jefferson County, Alabama's HOME-ARP Allocation Plan for the applicable year and will cover all non-compliance with Jefferson County, Alabama documents, executed agreements, audits and inspections that is identified during the period from January 1st through December 31st of the year immediately preceding the current HOME-ARP Allocation Plan year. Point deductions for non-compliance identified between January 1st and December 31st of each year will consider whether the Ownership Entity or other Responsible Owner completes corrective actions, follow up inspections or other verification of compliance within the deadline required by Jefferson County, Alabama, even if the deadline falls after December 31st of such year. Points lost will be assessed based on the following criteria:

Existing Jefferson County, Alabama- Project(s) Approved and/or Placed-In-Service (No Maximum)

- 1) 5 points (for each occurrence) will be deducted from an application if any Responsible Owner of the Ownership Entity altered an approved project in any manner different from the approved project's original application without prior written consent from Jefferson County, Alabama.
- 2) 5 points (for each occurrence) will be deducted from an application if any Responsible Owner of the Ownership Entity or the Management Company identified in the application is not in compliance with and/or has any uncured failure to meet a requirement specifically listed in any Jefferson County, Alabama document(s), the Jefferson County, Alabama HOME Loan or any applicable agreement(s) without prior written consent from Jefferson County, Alabama.
- 3) 2 points (for each occurrence) will be deducted from an application if any Responsible Owner of the Ownership Entity or the Management Company identified in the application for any of the following with respect to Davis Bacon requirements on any Jefferson County, Alabama-Project (approved and/ or Placed in Service):
 - No response on outstanding issues for over 6 months
 - The general contractor is unable to submit payrolls, causing an escrow account to be established
 - Outstanding issues remain over 2 years from the date of the notice to proceed
 - Failure to provide Jefferson County, Alabama the Section 3 report on the required date

- Failure to provide Jefferson County the HUD 2516 report on the required date

Non-Compliance after the Initial On Site Inspection (No Maximum)

Applications are subject to point deductions for failure to comply with previous agreements and regulations as found in monitoring on previous projects.

Applications with Responsible Owners that have non-Jefferson County, Alabama Projects, whether in the State and/or out-of-State, will be subject to the same Jefferson County, Alabama requirements.

**Jefferson County, Alabama's
ADDENDUM #1 to HOME-ARP ALLOCATION PLAN**

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I. ADDENDUM #1: CONSULTATION CLARIFICATION

The Department of Housing and Urban Development (HUD)' Birmingham Field Office note that Jefferson County's new plan still does not address the following Consultations:

1. **Public or Private Organizations that Address the Needs of Persons with Disabilities**
2. **Public or Private Organizations that Address Civil Rights and Fair Housing.**

This portion of Jefferson County's HOME APR plan was crucial for the Birmingham Field Office to move forward with approving or rejecting the plan. As we had not resubmitted the initial HOME ARP Plan dated September 27, 2022, it was indicated that the Birmingham Field Office would reject the plan again and allow the submission of a corrected plan as does not meet the required consultation of the above-mentioned agencies.

In regard to the consultations, Jefferson County provided the following clarification regarding the two types of organizations Jefferson County consulted in order to meet the requirement with the understanding that Civil Rights are personal rights guaranteed and protected by the U.S. Constitution and federal laws enacted by Congress, such as the Civil Rights Act of 1964 and the Americans with Disabilities Act of 1990. Civil rights include protection from unlawful discrimination on the basis of race, color, national origin, disability, age, religion, and sex (including pregnancy, sexual orientation, and gender identity):

For Public or Private Organizations that Address the Needs of Persons with Disabilities:

[AIDS Alabama's](#) mission is dedicated to eliminating new HIV infections and improving the health and well-being of people living with HIV through inclusive and empowering support services and HIV prevention education.

[Jefferson Blount St Clair Mental Health Authority](#) is a regional, public, nonprofit corporation established under Act 310 of the 1967 Alabama Legislature. The region served by the Authority is designated in the State Mental Health Plan as Region M-5, and comprises Jefferson, Blount and St. Clair counties, with a total of more than 800,000 residents. There are three mental health centers which serve the region. It is the responsibility of the Authority to plan, coordinate and develop the system of mental health services for the entire region. The Authority provides consultation regarding program development and funding; coordination of regional programs; delivery of region-wide services; and a consolidated budgeting process to simplify the funding of programs at the local and state level.

The Birmingham VA is an organization with numerous programs that addresses the needs of Jefferson County's veterans who may be living with disability.

The University of Alabama at Birmingham has numerous programs that addresses the needs of Jefferson County's citizens living with a disability.

For Public or Private Organizations that Address Civil Rights and Fair Housing:

AIDS Alabama work includes acting on behalf of the civil rights of the Latinx community through their [Alabama Latino AIDS Coalition](#) and the civil rights of persons living with HIV and the LGBTQ community through their [Advocacy Department](#),

In addition to civil rights, AIDS Alabama works to address fair housing relating to Sex (including gender identity and sexual orientation), Familial Status, and Disability through their advocacy programming.

The [Birmingham Volunteer Lawyers](#) work to address Fair Housing by providing free high-quality attorneys to low-income families through their Safe Housing program.

[YWCA Central Alabama](#) notes their mission is to eliminate racism, empower women and promote peace, justice, freedom and dignity for all. They specifically addressing Civil Rights as it relates to race and Sex.

On Thursday, September 1, 2022, Jefferson County, Alabama presented at the local Continuum of Cares' virtual meeting to collect information from stakeholders as part of the consultation process. The meeting was attended by 6 representative stakeholders consulted regarding one or both of the following required consultations:

1. **Public or Private Organizations that Address the Needs of Persons with Disabilities**
2. **Public or Private Organizations that Address Civil Rights and Fair Housing.**

Below is a list of the 6 organizations referenced:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation
Volunteer Lawyer's Program	Non-Profit Supportive Service	Virtual Meeting
University of Alabama at Birmingham	Public University, Hospital, and Supportive Service Provider	Virtual Meeting
AIDS Alabama	AIDS/HIV and Youth Housing and Supportive Service Provider	Virtual Meeting
YWCA of Central Alabama	Domestic Violence Housing and Supportive Services Provider	Virtual Meeting
Birmingham Veteran's Administration Hospital	Veterans Hospital, Housing, and Supportive Service Provider	Virtual Meeting
Jefferson Blount St Clair Mental Health Authority	Mental Health Housing and Supportive Service Provider	Virtual Meeting

