

## HOME-ARP Allocation Plan Template with Guidance

**Instructions:** All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

### Consultation

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

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

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

### Template:

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

In accordance with the City of Joplin Citizen Participation Plan, the requirements of HOME-ARP as outlined in CPD-21-10, and in consultation with the participants of the Joplin HOME Consortium, the City of Joplin conducted two advertised public meetings, and hearing to pass resolution by City Council. The formal consultation with the Jasper/Newton County Continuum of Care occurred at the first advertised public meeting on the 2<sup>nd</sup> floor conference room of Joplin City Hall to allow the public to participate remotely in the virtual meeting of the Homeless Coalition on May 9<sup>th</sup>, 2022. In total 18 agencies were involved in the consultation for that meeting. The second public meeting was on August 11<sup>th</sup>, 2022 at the advertised meeting of the

Joplin HOME Consortium members, nine jurisdiction in total. Both public meetings were followed by a public comment period of 30 days. Further, regular invitations to inquire on the program and consultation on eligibility and requirements of the program have been offered at the monthly meetings of the Homeless Coalition to develop familiarity of the program prior to any announcement of opportunity to apply for funding, in the interest of providing organizations with limited technical capacity time to familiarize themselves with the program and the ability to apply. Specific consultation with agencies that have expressed interest in potentially applying have been with Souls Harbor, Fuller Center for Housing, Economic Security Corporation and Catholic Charities. Since those initial consultations, Souls Harbor and Fuller Center have expressed they do not intend to apply. These consultations were not necessary on the allocation plan or gap analysis, but to understand the restriction on the operations and construction requirements of HOME-ARP programs. The Community Housing Resource Board is the entity involved with fair housing promotion in the Joplin area. All agencies participating in the board have been involved in the advertised public meetings or individual consultation as described in the table below.

*List the organizations consulted:*

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Economic Security Corporation of the Southwest Area</b>	Nonprofit/Lead Applicant of the Coc/ Homelessness provider/Coordinated Entry QPs served: Homeless, At-risk and other (including veterans). *Member of Community Housing Resource Board (Fair Housing)	CoC public meeting on May 9 <sup>th</sup> , 2022	Concurred that highest need is for rental units to place vouchers. Waitlist of those applying for assistance is substantially larger than past years and currently have approved assistance without a rental in which the household can be placed.
<b>Lafayette House (LH)</b>	Domestic Violence Shelter QPs served: Domestic Violence	CoC public meeting on May 9 <sup>th</sup> , 2022	Concurred with the delivery of the Gap Analysis report. Chair of the Homeless Coalition requested direct feedback from the organization and LH expressed need for clients to be placed in safe rentals
<b>Ozark Center</b>	Behavioral health/Counselling/Therapy QPs served: Homeless, at-risk, *Mental Disability Provider	CoC public meeting on May 9 <sup>th</sup> , 2022	Concurred with the Gap Analysis, no other comments provided
<b>Housing Connect</b>	Coordinated Entry Program QPs served: Homeless, At risk of homeless, (other including veterans, Domestic Violence)	CoC public meeting on May 9 <sup>th</sup> , 2022	Assisted in the Gap Analysis in providing data, no other comments provided
<b>Next Steps</b>	Homeless Outreach, QPs served: Homeless	CoC public meeting on May 9 <sup>th</sup> , 2022	Concurred with the Gap Analysis, no other comments provided
<b>Veterans Administration</b>	Public Agency, QPs served: At-risk and other (including veterans) *Disabled service provider, physical disability	CoC public meeting on May 9 <sup>th</sup> , 2022	Concurred with the Gap Analysis, no other comments provided
<b>ICA</b>	HMIS administrator for CoC	CoC public meeting on May 9 <sup>th</sup> , 2022	Assisted in the Gap Analysis, no other comments provided
<b>Catholic Charities</b>	Nonprofit homeless services and housing provider, QPs served:	CoC public meeting on May 9 <sup>th</sup> , 2022	Concurred with the Gap Analysis/Expressed interest in applying

	Homeless, At-risk and other		
<b>Access Family Care</b>	Affordable Healthcare Provider, QPs served: Homeless, At-risk and other, *vision, hearing impaired & physical disability service provider	CoC public Meeting on May 9 <sup>th</sup> , 2022	Concurred with the Gap Analysis, no other comments provided
<b>Children's haven</b>	Youth Shelter, QPs served: Homeless, At-risk, other, Domestic Violence (children only)	CoC public Meeting on May 9 <sup>th</sup> , 2022	Concurred with Gap Analysis, no other comments provided
<b>Jasper County Public Housing</b>	Public Housing Authority, QPs served: at risk and other, *accessible housing (disabled service provider), *Member of Community Housing Resource Board (Fair Housing)	CoC public Meeting on May 9 <sup>th</sup> , 2022	Concurred with Gap Analysis, no other comments provided
<b>Vita Nova Village</b>	Non-profit developing Tiny Home concept for homeless, QPs served: homeless	CoC public Meeting on May 9 <sup>th</sup> , 2022	Concurred with Gap Analysis/expressed interest in applying
<b>Salvation Army</b>	Homelessness Services Provider, QPs served: Homeless, At-risk	CoC public Meeting on May 9 <sup>th</sup> , 2022	Concurred with Gap Analysis, no other comments provided
<b>Soul's Harbor</b>	Emergency Shelter, QPs served: Homeless	CoC public Meeting on May 9 <sup>th</sup> , 2022	Concurred with Gap Analysis, no other comments provided
<b>Missouri State Defender's Office</b>	Legal services, QPs served: Homeless, At-risk and other	CoC public Meeting on May 9 <sup>th</sup> , 2022	Concurred with Gap Analysis, no other comments provided
<b>Legal Aid</b>	Legal services, QPs served: Homeless, At-risk and other, *Disability Service Provider, Specifically Reasonable Accommodation Legal Services, *Member of Community Housing Resource Board (Fair Housing)	CoC public Meeting on May 9 <sup>th</sup> , 2022	Concurred with Gap Analysis, no other comments provided
<b>Joplin Schools</b>	School District, QPs served: At-risk and Other	CoC public Meeting on May 9 <sup>th</sup> , 2022	Concurred with Gap Analysis, no other comments provided

<b>Joplin Public Housing Authority</b>	PHA*accessible housing (disabled service provider)	Direct email request June 1 <sup>st</sup> , 2022 (email attached). Consultation phone call followed with comments noted by staff.	Concurred with Gap Analysis/expressed interest in referring vouchers and potentially providing project vouchers if possible.
<b>Joplin HOME Consortium</b>	City of Carthage, City of Webb City, City of Carl Junction, City of Carterville, City of Sarcoxie, City of Oronogo, Village of Airport Drive, Village of Duquesne, Neck City, City of Purcell and Unincorporated Jasper County.	Consortium Public Meeting on August 11 <sup>th</sup> , 2022	Commented on Allocation Plan prior to Council. Comments were nearly entirely in approval if HOME-ARP funds were not geographically distributed and instead spent in Joplin since the vast majority of the homeless population is within the Joplin City limits.

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

The majority of feedback was concurrence with the determination that the highest need is for new rental units to be available for qualifying populations. Currently members of the CoC have vouchers and funds expiring due to lack of participating units in which to place them. The majority of Consortium Members comments reflected that Joplin was where the majority of qualifying populations were located and the majority of expenditures being located in Joplin would be consistent with the need and where further services were located. At the May 9<sup>th</sup> Continuum of Care (Homeless Coalition) public meeting, specific comments and feedback was solicited by staff. When none was received, further requests to the entire Homeless Coalition mailing list was sent requesting specific comments to the allocation plan. None were returned and staff has interpreted the lack of comments in disapproval or disagreement as unanimous consent. Request for comment to the mailing list of the Coalition is attached. All agencies with the notation “assisted in the Gap Analysis” provided specific information in order to determine the size of one or more of the qualifying populations due to limited data availability.

**Public Participation**

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must

follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

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

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

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

**Template:**

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

- *Date(s) of public notice: 5/10/2022*
- *Public comment period: start date – 5/10/2022 end date – 6/8/2022*
- *Date(s) of public hearing: 9/18/2022*

In total there have been two 30 day public comment periods. The first was following the May 9<sup>th</sup> public meeting of the Continuum of Care on May 9<sup>th</sup> and closing on June 8<sup>th</sup>, and the second was following the meeting on August 11<sup>th</sup> and ending on September 12<sup>th</sup>.

*Describe the public participation process:*

In accordance with the City of Joplin Citizen Participation Plan, the requirements of HOME-ARP as outlined in CPD-21-10, and in consultation with the participants of the Joplin HOME Consortium, the City of Joplin conducted two advertised public meetings, and hearing to pass resolution by City Council. The formal consultation with the Jasper/Newton County Continuum of Care occurred at the first advertised public meeting on the 2<sup>nd</sup> floor conference room of Joplin City Hall to allow the public to participate remotely in the virtual meeting of the Homeless Coalition on May 9<sup>th</sup>, 2022. The second public meeting was on August 11<sup>th</sup>, 2022 at the advertised meeting of the Joplin HOME Consortium members. Both public meetings were followed by a public comment period of 30 days. Further, regular invitations to inquire on the program and consultation on eligibility and requirements of the program have been offered at the monthly meetings of the Homeless Coalition to develop familiarity of the program prior to any announcement

of opportunity to apply for funding, in the interest of providing organizations with limited technical capacity time to familiarize themselves with the program and the ability to apply. All agendas posted by the city include the following required reasonable accommodation language. “**NOTE:** If you are in need of disability related auxiliary aids or services, contact our Joplin ADA Coordinator at 624-0820, Ext. 210, or the Joplin City Clerk’s Office at 624-0820, Ext. 220. Kindly give us forty-eight (48) hours’ notice to arrange for the aids or services. TTD Number (417) 625-4774. *Interpreter services are also available if requested at least seven calendar days in advance of the meeting. Servicios de interpretación están disponibles si se piden al menos 7 días antes de la reunión.*” Copies of the plan are available upon request through the contact provided on the notice and drafts are located on the Community Development webpage during comment periods.

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

In accordance with City policy all public meetings are held in accessible locations, and if meeting participants are virtual, the City accommodates those without internet access by providing conference space with appropriate equipment to ensure participations. All agendas are posted with contact to be given notice if accommodation will be required to attend. Public meetings and comment periods are above the required minimum for plan adoption in the City of Joplin Citizen Participation Plan. For the past few years, Community Development has been taking the meeting to the partners. As the example for the process of this plan, the HOME-ARP gap analysis and allocation plan were delivered at the meeting of the Homeless Coalition to ensure attendance. Similarly, the second meeting was held at a convened meeting of the HOME Consortium. Public meetings inviting agencies and the public to City Hall where the only agenda item is an action or allocation plan returns little and likely no attendance.

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

Responses from the participants in the public meetings can be summarized as a need to have units available to house qualifying populations. Some organizations expressed interest in coordination with those who would apply. The only responses from individuals from the public not representing a homeless organization were phone contacts made through the newspaper advertisement. The comments varied greatly.

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

The only comments not accepted were phone call responses from individuals from the public in response to notice in the paper, and can be summarized as recommendations to expend the funds on ineligible activities that did not serve homeless populations. Examples include, fund police and fire, repair streetlights in their neighborhood, etc.

## **Needs Assessment and Gaps Analysis**

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



**Template:**

**OPTIONAL Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	54	2	1250	4	15								
Transitional Housing	45	3	45	2	25								
Permanent Supportive Housing	51	5	85	3	98								
Other Permanent Housing	#	76	#	#	#								
Sheltered Homeless						24	98	38	#				
Unsheltered Homeless						#	36	4	#				
<b>Current Gap</b>										25	1	0	0

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

**OPTIONAL Housing Needs Inventory and Gap Analysis Table**

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	8800		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	250		
Rental Units Affordable to HH at 50% AMI (Other Populations)	430		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		920	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		700	
<b>Current Gaps</b>			750

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

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

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

The Point in Time Count (PIT) is an annual attempt to census the homeless populations by the Jasper/Newton County CoC (Homeless Coalition). The count included sheltered and unsheltered homeless persons on a specified day. The emergency shelters of Joplin do not participate in the PIT and estimates based on estimates and interviews conducted with homeless staying in shelters as well as consultation with agencies providing service to the sheltered populations. Outreach is conducted for the unsheltered count. The last PIT had a total of 258 between sheltered and unsheltered. This is a nominal number as homeless camps are regularly discovered in times other than the PIT. The demographics for the last PIT were 70% White, 11% Black, 11% Multiple Races and 7.5% Hispanic. This represents slightly higher minority populations than the general population. Less than 40% of the homeless population is female and 38 persons or 16% of the total were children under the age of 18. None of the children were unsheltered and 7 were in emergency shelters. Among veterans, none are listed as chronically homeless, and of a total of 27 veterans, only 2 were included in the unsheltered count. Most veterans that meet the definition of homeless are located in transitional housing. The racial demographic of veterans more closely resemble the composition of Joplin with 80% being White and the only other race reporting being Black.

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

At risk of homelessness is the largest. There are a thousand inquiries for services relating to housing instability in any given year according to providers, as well as an annually 600 persons assisted in the last year still in unstable conditions due to lack of income. According to the last comprehensive housing analysis there are 8,850 housed residents living below the poverty level. Of that total, 591 or nearly 7% are "no cash renters" and is consistent with the approximate number of no income assisted renters through voucher programs, which helps support the validity of the 8,850 being an accurate estimate. Further, 14% of owner and nearly half of renter households are paying more than 30% of their income in rent among all income groups, also according to the study. Given average household size, that is approximately 11,500 persons. Given that whether or not 30% of income towards housing constitutes housing cost burden is contingent on income and factors such as number of dependents, the 8,850 number is a reasonable estimate.

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

Due to concerns over safety, the principle Domestic Violence Shelter provider, Lafayette House, is prohibited from reporting numbers into HMIS and a more general estimate of persons being assisted at any time is 20. No information is available for an annual number, and no other data is available as the area only has one provider.

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice*** More than 8,000 persons are very-low-income according to the most recent 2021 comprehensive housing analysis <https://www.joplinmo.org/446/Planning-Zoning-Development>. Income is being used as the primary factor to determine populations in need of services or housing to prevent homelessness. This is consistent with consultation with area partners. According to the Director of Housing at Economic Security Corporation they currently have an inquiry list of 1000 housed households needing assistance in remaining housed. Further, populations that have previously been housed continue to remain unstable and at risk as indicated by the return to homelessness chart provided by the CoC.

**Measure 2a and 2b: The extent to which Persons who Exit Homelessness to Permanent Housing Destinations Return to Homelessness within 6 to 12 months (and 24 months in a separate calculation)**

	Total # of Persons who Exited to Permanent Housing Destination (2 Years Prior)	Returns to Homelessness in less than 6 Months (0-180 days)	Returns to Homelessness from 6 to 12 Months (181-365 days)	Returns to Homelessness from 13 to 24 Months (366 – 730 days)
Exit was from SO	4	0	0	0
Exit was from ES	41	4	0	3
Exit was from TH	37	4	0	3
Exit was from PH	230	10	8	4
TOTAL Returns to Homelessness	312	18	8	10

The table above is provided by the HMIS system performance measures report and gives an estimate of the other populations previously defined as homeless needing supportive services to remain housed at approximately 350.

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

The total ESG funds awarded for PY 2020 was approximately \$660,000.00. Of those funds approximately \$130,000.00 are allocated for rapid rehousing, \$315,000.00 allocated to Shelter Care Plus, \$90,000.00 for permanent supportive housing and \$50,000.00 for Chronically Homeless programs. Further TBRA and homelessness prevention funds are applied for and received from MHDC as well as supportive services funds to fully fund Coordinated Entry. HMIS and Coordinated Entry funds is provided through the City of Joplin CDBG Entitlement

Program. However, even those who have received assistance are having trouble finding a unit in which to be housed. Waitlist and those seeking units after receiving housing assistance are approximately three times the size from 2019.

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

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

The most common service need for homeless population is obtaining the necessary documentation for coordinated entry referrals, and other services. Examples include, obtaining identification, social security cards, birth certificates or documentation for currently enrolled benefits. Participation of landlords accepting persons with approved housing assistance is also not enough to meet the population and average waitlists have grown. Pre-pandemic waitlists of approved assistance seeking rentals were consistently around 20 individuals while post-pandemic the number is consistently above 60. The Joplin shelters are high barrier in requiring religious participation, sobriety, and minimum number of days since last incarceration to access services. The emergency shelters do not participate in the HIC, however, based on interviews of persons residing in shelter, even at times of peak demand the shelters have not been filled to capacity due to these limitations on access.

There are 200 available facility-based emergency shelter year-round beds estimated according to the last HIC. There are an additional 278 permeant supportive housing, rapid rehousing and chronically homeless year-round beds through multiple agencies. In the total inventory, 33% are emergency shelter, 20% are transitional housing, 34% are permanent supportive housing and 13% are rapid rehousing. The utilization rate of veteran rapid rehousing and shelter is approximately 50% demonstrating there is sufficient shelter for that sub-population. The programs that continuously have a utilization rate of 100% are the chronic homeless, shelter care plus and rapid rehousing programs through Department of Mental Health, ESC and Catholic Charities. This supports the Coordinated Entry preference for QP1 homeless populations. The emergency shelters do no utilize Federal funding, but the remaining programs utilize CoC funding from Housing and Urban Development in the amount of approximately \$660,000.00.

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

Legal services relating to lease agreements, evictions, or reasonable accommodations are frequently requested by at risk populations and referrals made to Legal Aid of SW Missouri. The SAHFR program administered by MHDC was intended to alleviate this condition but has proven difficult to access to many of the at risk populations. Utility assistance is often needed but is usually limited to heating assistance, with the exception and temporarily, for the last year water assistance has been available. ESC quickly spent the available ESG-CV funds it received to stabilize at rick renters through prevention assistance and utility assistance. Since nearly half of the renter tenure household are under housing cost burden, affordable rental supply also needs to be expanded to alleviate supply shortages for this

population. The Prevention and Diversion Screening Tool has been implemented as part of the Coordinated Entry process for several years due to the growing needs of this qualifying population. In the last year nearly 300 assessments taken were resolved with referral to prevention and supportive services programs to remain housed. However, prevention program funds, in total no more than \$120,000.00 among a couple agencies are not depleted annually prior to each years next round of funding as their high demand is a result of the ever increasing number of renters in housing burdern. Ozark Center as part of the Freeman Hospital Health Network is the agency receiving referrals for substance abuse and mental health, however, numbers of those served who specifically received referral through the prevention tool is not available.

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

Commonly persons feeing domestic violence were not the source of income for the household and obtaining income is a high priority. Often leaving the abusive household means leaving without any access to finances, credit or utility history. Due to Lafayette house being the sole DV provider in the area, the agency is extremely insulated among agencies due to concerns of privacy and security, and not much data is available. Lafayette House reports 30 beds as part of the HIC.

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

Other populations significantly consist of those of extremely low income and previously meeting the definition of homeless tend to need additional case management and wrap around services to remain housed, and those services are extremely limited. Housing condition tends to be poor and no written lease is common among this population making them further vulnerable. Obtaining certifications or high school equivalency is often needed, or consultation in obtaining written leases to help stabilize housing is also often needed. The PHA administers 275 scattered site homes, and 4 apartment complex with an additional 350 units. Vacancy for the PHA is consistently near zero. The PHA also administers approximately 530 vouchers. Area agencies also provide key services such as a free clinic for the uninsured, food banks and donated clothing stores, as well as utility assistance programs such as LIHEAP.

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

Currently the two principle shelters for non-veteran adults do not report their housing inventory to HIC reporting and mental health services are provided by partners to the sheltered but services are limited. All shelters in the area are high barrier requiring religious participation, sobriety, and minimum number of nights since being incarcerated. The two principle shelters provide an estimated 95 beds. Children’s Haven provides 26 units for unaccompanied youth. HOUSE Inc. provides 15 veterans units, and Lafayette House provides 30 units for shelter of those fleeing

domestic violence. The 76 available rapid rehousing units are continuously at a 100 % utilization rate, and the same can be said of the available 120 transitional housing units available across several agencies including those dedicated to veterans. There are an additional 202 permanent supportive housing units for eligible populations such as the chronically homeless. The utilization rate of the PSH units is also consistently at 100%. Based on the utilization rates there is sufficient emergency services and the greater need is for permanent housing. This is further supported by the number of persons who have been approved for housing assistance but cannot locate a participating landlord to receive housing.

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

Housing cost burden is the most prevalent condition. Condition of housing is also an issue, as well as lack of income due to conditions such as disability. The waitlist for the PHA demonstrates how the lack of accessible units is greatly increasing the disabled vulnerability to being homeless, as those with a disability are by far the greatest cohort on the list.

Size	0BR	1BR	2BR	3BR	4BR	5BR	6+BR	Total
Elderly	0	133	6	0	0	0	0	139
Near Elderly	0	2	0	0	0	0	0	2
Handi/Disabled	0	302	27	5	2	0	0	336
Single Fed Disp	0	0	0	0	0	0	0	0
Family	2	151	166	72	28	1	0	420
Hispanic	0	10	9	2	1	0	0	22
White	2	429	158	60	18	1	0	668
Black	0	54	20	11	7	0	0	92
Indian/Alaskan	0	9	4	2	1	0	0	16
Asian	0	2	2	0	0	0	0	4
Pacific Islander	0	0	0	1	0	0	0	1
Mixed	0	8	7	1	2	0	0	18
Other	0	3	4	2	2	0	0	11
	2	588	199	77	30	1	0	

Income Limit Breakdown

High	2
low	78
Very Low	167
ExtLow	507

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

The rental market is currently extremely competitive. All qualifying populations would benefit from greater supply. This is creating further pressures on those experiencing homelessness. Currently, a number of organizations in the Homeless Coalition have approved assistance for housing with no unit for the recipient to be placed.

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

The PIT and HIC is much of the readily available data for gap analysis, however, HMIS performance measure can further elaborate what is otherwise a limited dataset. Return to homelessness remains relatively low in the CoC however, length of homelessness and days on the active list until placed in permanent housing has been growing. The strongest determinant in determining highest level of need is comparing bottleneck in services beginning from the relatively low utilization of emergency shelter, high utilization of transitional and rapid rehousing programs, increasing waitlists at the PHA and those approved for assistance (vouchers) and the inability to locate rentals to accept vouchers. While the lack of low-barrier shelter is a gap, and any new HOME-ARP non-congregate shelter would help address this as required by the HOME-ARP regulations, given the numbers of person and demands on services stack and demand grows as services transition from emergency shelter to permanent housing placement, increase in available rental units for the qualifying populations is apparent. Specifically, in waitlist of those approved for assistance but unable to find a rental to accept them moving from 20 a any given time to consistently over 60 and the extremely long PHA waitlist, over 500, that is overrepresented with person with disabilities clear indicate the need to provide accessible units to qualifying populations. This is confirmed through the 2021 Comprehensive Housing Study that identifies the rental market is extremely competitive, rents are increasing, as specifically, affordable housing stock is not being replaced at the rate at which it is lost.

## **HOME-ARP Activities**

**Template:**

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

The City of Joplin will administer the allocation of HOME-ARP funds and manage HOME-ARP activities through Sub-Recipient agreements, similar to the existing HOME program. The City will issue Notice of Funding Opportunity and provide 30 days for preliminary applications to be submitted. Preliminary applications will be required to determine project eligibility, prioritization for funding based on needs determined within this allocations plan, and preliminary feasibility for all construction project for the 15 year period as required in CPD-21-10. A Rank and Review Committee consisting of organizations serving qualifying populations who do not apply for

funds, similar to the CoC process for allocating funds, will be used to prioritize funding and awards granted on activities serving highest need and awarded based on funds available. Applications will be scored based on criteria published in the NOFA. The rank and review committee will be composed of representatives from homelessness provider agencies not applying for HOME-ARP funds and City Staff. The committee will have a high degree of authority to allocate to high scoring applications, funds that meet the identified needs in the gap analysis. However, funds must be allocated so that the project is feasible, and all applications must include pass/fail responses to ensure eligibility and compliance with the program requirements. No application can be funded unless eligible not matter how high the application scores on the entirety of the NOFA response.

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

Activities, including agreement for construction, will be administered through sub-recipient agreements similar to the existing HOME program.

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

No portion of the administrative funding was distributed prior to HUD's approval of the City's HOME-ARP Allocation Plan

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



**Template:**

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 173,601.70		
Acquisition and Development of Non-Congregate Shelters	\$ 173,601.70		
Tenant Based Rental Assistance (TBRA)	\$ 173,601.70		
Development of Affordable Rental Housing	\$ 868,008.50		
Non-Profit Operating	\$ 86,800.85	5 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 260,402.55	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,736,017.00</b>		

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

Preliminary allocations are determined by first by needs identified in the gap analysis, and the funding thresholds identified in the Citizen Participation Plan that will allow funds to be de-obligated and moved to construction project as a minor amendment, to ensure timely delivery of sub-recipient agreements to City Council. Non-congregate shelter has a limited amount of funding within the threshold of minor amendment for a limited application. Non-congregant shelter would be able to address the lack of family units, as nearly all shelter is open floor dormitory design. However, currently all shelters in the area are not low-barrier, and a low barrier organization would have to provide the shelter using these funds. Additionally, all local shelters have a sex preference in separating sex by dorm. Award for non-congregant shelter would also have to be with an agency with a no sex preference. TBRA is also being included in the allocation as a means to spend any unused funds after construction contracts are awarded. Minor amendments will be used to adjust the allocation to levels requested through applications, with the highest priority being what was identified as the highest need in the gap analysis, affordable rental housing.

***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 waitlist for housing placement for the CoC is long. Shelters are not at high utilization rates and have vacancy. Vacancy is largely due to the shelter being high barrier, and there is a need for low-barrier shelter, however there would first be the need for a low barrier shelter organization to be available, and currently there are not. The availability of affordable rental units continues to become ever more acute. The production of 10 units is insufficient to meet the need, however, of the eligible activities it is the best use.

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

### **Template**

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

Due to the need of reserve funds to ensure 15 years feasibility, funds used for production of rentals is not anticipated to produce more than 10 units. This is due to the funds that will be necessary to be reserved to assist in rents for a population with little or no income, unless project based assistance can be provided by another partner to ensure the viability of the project for the required 15 years upon completion.

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

As part of the new Joplin Development Code, the allowance for a courtyard pattern of development of small units is permitted. Such a development is appropriate for serving qualifying populations of the program. During agency consultation, this change in code has been shared as a means to facilitate discussion. Small individual units around a shared greenspace is efficient and limits the required site costs. The production of 10 affordable rental units is insufficient to meet the need. Hopefully, additional units can be produced if additional sources can be leveraged, however, even with the maximum reasonable estimate of additional sources, the rental production as a result of HOME-ARP will not meet the local need, but funds are allocated to the greatest need in order to minimize the detrimental effect the acute shortage of affordable housing is currently having in the community, and in particular to the HOME-ARP qualifying populations that will occupy the new units.

## Preferences

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

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

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

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

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

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

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

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

**Template:**

***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:***

Coordinated Entry (CE) is required as part of this allocation plan. CE already meets the requirements of the HOME-ARP regulations of an expanded CE service through the use of a Prevention and Diversion Screening Tool to address other and at-risk qualifying populations. Non-homeless or other and at-risk populations are screened with the Prevention and Diversion Screening Tool prior to entry in the homeless service system for referral to appropriate services based on service needs or alternate diversion options with entry into emergency housing when there is no other alternate path. Any assessment of domestic violence is an immediate referral to Lafayette House, the only domestic violence provider. Through these measures, Coordinated Entry already addresses the qualifying populations. Preference of the CoC Coordinated Entry is for QP1 homeless in housing referrals and placement.

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

As mentioned in the prior description of the gap analysis results, the CoC currently has many households with approved assistance without a participating rental unit to sign lease. The availability of HOME-ARP units will greatly assist in addressing the bottleneck of those receiving assistance, the largest gap identified in the analysis. Based on the preference for homeless

qualifying populations, prioritization will be addressed through Coordinated Entry by the evaluation of service needs as part of the VI-SPDAT V.2 screening tool. The prioritization policy and screening tool of the Jasper/Newton County Continuum of Care to prioritize those at highest risk. Summary of the prioritization with respect to HOME-ARP funded units as outlined by the CoC prioritization table is:

1. Chronically Homeless – Individuals or families with severe service needs.
2. Homeless – Individuals or families with disabilities and severe service needs.
3. Homeless – Homeless individuals with disabilities
4. Category 1 – Individual or household with Children
5. Length of time of homelessness

There will be no further prioritization among other qualifying populations other than this screening tool.

## **Referral Methods**

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

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

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

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

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless,

etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ’s HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

**Template:**

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

The CoC Coordinated Entry area is larger than the Consortium and geography will not be a factor for referrals. Jasper/Newton County Coordinated Entry already meets expanded CE requirement for HOME-ARP as other populations are addressed through the use of screening tools prior to homelessness prioritization (Table below). Other populations and qualifying populations will be referred to existing homelessness prevention programs prior to referral to homeless providers. Direct referrals from Coordinated Entry will be used and other referral methods only if the Coordinated Entry list is insufficient to fill vacancy. Other referrals for eligible qualifying populations will be maintained chronologically in order for placement in project specific waitlists.

Screening Tools	Purpose
Prevention and Diversion Screening Tool	Used prior to entry in the homeless service system to determine 1) level of emergent housing and/or service needs, and 2) alternative prevention and diversion options other than entry into an emergency shelter/ emergency housing
Individual and Family VI-SPDAT V.2	Used, no later than 7 days after entry, to determine the best housing intervention

Numeration of the existing expanded Coordinated Entry workflow to ensure other populations as all qualifying populations are included is as follows:

1. Upon seeking assistance, families/individuals are initially asked two pre-screening questions that will determine if they will qualify for services. Questions include:
  - a. Are you currently homeless or do you believe you will become homeless within the next 3 days (or 72 hours)?
  - b. Have you experienced domestic violence?
2. If the family/individual is currently homeless the HRC will complete HMIS data entry
3. If the family/individual is not currently homeless and/or will not be within the next three days, the HRC will not complete HMIS data entry, and:

- a. HRC will refer families/individuals to prevention and diversion resources available within the community.
4. If the family/individual does qualify for homeless services, the HRC will request that the family/individual review, sign, and date the “Housing Connect Release of Information” form and the “Homeless Missourians Information System Network Client Informed Consent to Share and Release of Information form.”
5. If a family/individual answered yes to the domestic violence question, they will be referred to Lafayette House.
6. HRC will use a vulnerability assessment (Joplin Assessment Tool) to determine prioritization, which includes:
  - An assessment score greater than 3
  - Length of homelessness
  - Disability
  - Level of service needs
7. Prioritization for a housing intervention is further illustrated in the Housing Connect Prioritization Matrix.
8. Once assessed, families/individuals driver’s license(s), picture ID(s), social security card(s) and proof of disability, income, and homelessness is scanned into the HMIS. The family is then added to the prioritization list within the HMIS.
9. If the family/individual needs to be picked up by a specific agency that does not have HMIS access (example - VA), HRC will send an email or call the provider with applicable family/individual information. Providers with access to HMIS will be sent a referral within the HMIS system.
10. If a HOME-ARP provider has an opening and the family/individual meets programs guidelines:
  - a. The provider will attempt to contact the family/individual by phone or other alternative contact resource provided, to set up an appointment, or;
  - b. If the provider has attempted and is unable to locate the family/individual after fifteen business days, the provider will notify the HRC. The HRC will attempt to locate family/individual, if unable to contact after 5 days the housing provider will reject the referral within the HMIS and request a new referral.
  - c. Upon successful contact and completed program intake, the provider will accept the referral within the HMIS and make appropriate comments in the HMIS.
  - d. Upon successful “move in,” the provider will inform HRC, at which time the family/individual will be removed from the list and appropriate notations will be made within the HMIS.
  - e. If there has been no contact with the family/individual for at least 30 days and provider has met with the family/individual and HOME-ARP unit or funds have been reserved, then the housing provider will notify the HRC. The HRC will attempt to locate

family/individual for 5 additional days. If there is no contact then housing provider will request a new referral and they will be removed from the list.

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

All qualifying populations are eligible. The only subpopulations that differ in referral is that currently domestic violence populations are exclusively referred to Lafayette House, unless a HOME-ARP applicant proposes serving that population, in which case the HOME-ARP funded activity would accept referrals in the same manner as our existing organization serving domestic violence sub-populations.

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

Housing Type	Homeless Status	Priority Order	Priority Factors
PSH	CH	1	Chronic - Individual or families with long periods of homelessness and severe service needs
		2	Individuals or Families with disability and severe service needs
		3	Individuals or Families with disability
		4	Individuals or Families with a disability - Transitional Housing
RR & TH	HOMELESS	5	Category 1 - Individual or HHLD with children
		6	Category 1 - Individual or HHLD with children
		7	Category 1 - Individual or HHLD with children
		8	Individuals or Families without disability
		9	Category 1 - Individual or HHLD with children
		10	Category 1 or 4 Individual or HHLD with Children



CoC Prioritization table above.

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

The Coordinated Entry Process will be used for HOME-ARP funded projects.

### **Limitations in a HOME-ARP rental housing or NCS project**

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

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

### **Template**

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

There will be no limitation on qualifying population on any HOME-ARP projects whether affordable rental production or non-congregant shelter. The CoC CE prioritizes qualifying populations on risk in accordance to the prioritization matrix included above and therefore the

utilization of CE will also not create any limitations. Fleeing, or attempting to flee domestic violence (QP3) populations will be referred to the domestic violence shelter, and no proceed through the typical Coordinated Entry process, but will not be excluded from being placed in a HOME-ARP unit.

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

HOME-ARP units produced will no have limitations. Accessibility will be required to ensure disabled subpopulations can be served as a need identified in the gap analysis, but no limitation will be placed on any qualifying population.

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

The Coordinated Entry process will not give preference to qualifying populations and therefore no limitations in either affordable rental production or non-congregant shelter.

## HOME-ARP Refinancing Guidelines

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

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

No funds will be used for refinancing.

- ***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.***

Applicant will be required to use a 15 year proforma provided by the PJ to ensure the underwriting standards are met and considerations for feasibility are programed into the development.

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

Investment will be targeted to create new affordable units to be consistent with the gap analysis findings.

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

Compliance period for HOME-APR will be the 15 year minimum.

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

HOME-ARP funds will not be used for any manner of refinance.

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

Participation with Coordinated Entry will be required.