

## 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:***

King County consulted with nine organizations/agencies across all the required stakeholders. These consultations occurred between November 2021 and February 2022 and were conducted via remote Video Teams meetings.

*List the organizations consulted:*

| Agency/Org Consulted                                       | Type of Agency/Org  | Method of Consultation           | Feedback  |
|--|---|----------------------------------|---|
| <b>King County Regional Homelessness Authority (KCRHA)</b> | Continuum of Care/homeless; newly established regional (King County and Seattle) body to address homelessness holistically.                         | Remote video meeting<br>11/29/21 | Allocating HOME-ARP funds for capital purposes, to support development of new PSH housing and new non-congregate shelters makes sense. There is significant need for PSH and shelter units throughout the County to serve homeless populations that have been under resourced from a capital perspective. Proposed approach makes sense and will advance the construction pipeline and provide shelter and permanent supportive housing for homeless. |
| <b>King County Housing Authority (KCHA)</b>                | Housing Authority, serves homeless, those at risk of homelessness, people with housing instability (Other QP), those with disabilities, and seniors | Remote video meeting<br>12/22/21 | Supports funding the proposed PSH and shelter projects. Asked County to consider allocating some resources for housing stability services or for capital for another PSH development project.   |
| <b>Renton Housing Authority (RHA)</b>                      | Housing Authority, serves homeless, those at risk of homelessness, people with housing instability (Other QP), those with disabilities, and seniors | Remote video meeting<br>2/4/2022 | Development of new units, operations, and services are all priority needs. Development and ongoing operating costs, specifically insurance and staffing, are rising. Supports prioritizing these funds for capital purposes and continuing to balance needs for capital and operating/services resources.   |
| <b>Coalition Ending Gender Based Violence</b>              | Nonprofit organization supporting domestic violence victims, including those who are homeless or at risk of homelessness, or                        | Remote video meeting 2/7/22      | Coalition of more than 40 diverse member organizations in King County working to end gender-based violence. Housing and shelter for survivors of domestic violence is a critical need. Highly supports allocating funds to both the DV shelter on the Eastside as   |

|   |   |                             |   |
|---|---|-----------------------------|---|
|   | have high housing instability.  |                             | well as the proposed non-congregate shelter in South King County, where shelter is much needed. Notes that shelters not specifically focused on serving DV survivors do serve high percentage of DV survivors. Cited one shelter that, while not prioritized as DV, 50% of their residents are DV survivors. And another shelter reports that 30%-40% of their callers are fleeing DV. Glad to see these funds supporting DV shelter and shelters more broadly.         |
| <b>King County Adult Services Division (ASD)</b>                  | Local government agency managing the majority of King County's Veteran services, including services for homeless veterans, those at risk of homelessness, and those with high housing instability.  | Remote video meeting 2/7/22 | Meeting included King County teams focused on homeless Veterans, including Veteran Operations Leadership Team (VOLT) and Veteran's Initiative team.<br>HOME-ARP funds are a good match for homeless Veterans. Support allocating funds for PSH serving some homeless Veterans. Consider the service level PSH projects provide for Veterans, make sure they are providing appropriate services. Look at pairing funds with HUD VASH vouchers to ensure case management. |
| <b>King County Behavioral Health and Recovery Division (BHRD)</b> | Local government agency addressing needs of qualifying populations, including those at high risk of housing instability, including those with mental and behavioral health conditions and substance use issues, homeless and those at risk of homelessness. | Remote video meeting 2/9/22 | Encourages HOME-ARP allocation serving homeless housing (PSH), shelters, and new non-PSH units serving those unstably housed. Raised concern about coordinated entry system (CEA) not prioritizing clients they serve, those stepping down from behavioral health or health care facilities. Encouraged funding for non-PSH affordable housing serving those with behavioral health conditions, and potentially connecting with PACT (Program                           |

|  |  |                              |  |
|--|--|------------------------------|--|
|  |  |                              | for Assertive Community Treatment) which provides wrap-around services.  |
| <b>Fair Housing Center of Washington</b> | Nonprofit agency providing fair housing education, outreach, and enforcement services.                                 | Remote video meeting 2/11/22 | <p>Supports use of HOME-ARP funds for capital purposes – development of shelters and affordable housing. There is high need for non-congregate shelters throughout King County and the State.</p> <p>Ensure that affordable housing developers using these funds create and implement affirmative marketing plans. Any opportunity to provide developers with fair housing training?</p> <p>Also, ensure that new developments are located near amenities (businesses, parks, hospitals) that will help residents thrive.</p>  |
| <b>The Arc of King County</b>            | Nonprofit agency serving people with disabilities, specifically people with intellectual and development disabilities. | Remote meeting 2/23/22       | <p>Housing system is not serving people with Intellectual and Development disabilities (IDD) the way it needs to. Where can we improve? Homeless housing and CEA are focused on behavioral health and substance use conditions. And people with I/DD are not prioritized if not homeless. Current model typically supports small I/DD group homes. We need to scale up and integrate needs and housing to accommodate people with full range of disabilities, including I/DD.</p> <p>Support the proposed HOME-ARP allocation plan, three identified projects will support people with disabilities. 64% of the unhoused have at least one form of disability.</p> <p>And encourage County to support housing that serves a broader spectrum of disabilities, not just behavioral health disabilities.</p> |

|   |   |                        |   |
|---|---|------------------------|---|
| <b>Alliance of People with Disabilities</b> | Nonprofit agency serving people with disabilities | Remote meeting 2/23/22 | The Alliance of People with Disabilities is the Independent Living Center for King County, providing a variety of services to people across a range of disabilities.<br>Joint meeting with The Arc of King County; feedback captured above. |
|---|---|------------------------|---|

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

Please see specific agency feedback above.

All stakeholders support allocating HOME-ARP funds to the three King County recommended projects. All noted significant need for non-congregate shelter serving homeless and people fleeing domestic violence, and permanent supportive housing serving homeless populations. Agencies support housing resources serving these limited populations at the three different projects and requested that broader populations be served in a fourth, to be selected, project.

Some agency representatives asked whether King County could allocate some HOME-ARP funds for supportive services. King County responded that it has allocated \$16 million in other COVID relief funds for supportive services and that any projects receiving HOME-ARP capital funds will receive services funds from other sources to ensure residents have the support they need.

Stakeholders supported funding a domestic violence shelter in East King County and housing some homeless Veterans within a permanent supportive housing (PSH) project in South King County.

Most agencies support using coordinated entry for all (CEA) for prioritization at the PSH project, but one noted that CEA does not sufficiently serve people with behavioral health issues. They asked if the remaining HOME-ARP balance could be considered for broader affordable housing that better serves people stepping down from behavioral health or health care facilities. This population is part of both the At Risk of Homelessness and Other qualifying populations, who will be eligible to access a fourth HOME-ARP funded project.

Another agency noted that people with Intellectual and Developmental Disabilities are not served well by the current housing system and requested that remaining HOME-ARP funds be available for this population. As a result of this request, King County is adding those experiencing “intellectual and developmental disabilities” to the characteristics included in the “Other” qualifying population.

One agency requested using the balance of HOME-ARP funds for a second PSH project because the need for permanent supportive homeless housing is so great. King County cannot fund another PSH project because its overall HOME-ARP program would not be accessible to all four qualifying populations. King County's PSH projects are limited to homeless. Instead, King County will fund a fourth project that is accessible to all four qualifying populations to ensure its overall HOME-ARP program provides access to all four QPs.

## **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: 3/18/2022***
- ***Public comment period: start date – 4/4/2022 end date - 4/18/2022***
- ***Date(s) of public hearing: 4/15/2022***

***Describe the public participation process:***

King County's Housing, Homelessness and Community Development Division (HHCDD) conducted outreach to key stakeholders from November 2021 through February 2022. Stakeholders included the CoC, homeless and domestic violence providers, public housing authorities, public agencies addressing the needs of Veterans and other qualifying populations, and nonprofits addressing fair housing and the needs of people with disabilities. In these

meetings King County asked stakeholders what the most pressing housing needs are for homeless people, those at risk of homelessness, those fleeing domestic violence, and those unstably housed. King County shared a draft HOME-ARP Allocation Plan, which identified three capital projects proposed for funding and a HOME-ARP balance that would be offered in the 2022 housing capital funding round. We asked stakeholders whether this funding plan aligns with the needs they are seeing, or where there may be gaps.

In addition, King County gave notice of the HOME-ARP public participation process through the Seattle Times, published on 3/18/22 and through an email King County sent to stakeholders on 3/22/22. Materials were published on the King County website on 4/4/2022. The public comment period started on 4/4/22 and ended on 4/18/22, and King County held a remote public hearing via Zoom on 4/15/22.

King County provided the amount of HOME-ARP funds allocated to it by HUD, a DRAFT HOME-ARP Allocation Plan reflecting the range of eligible HOME-ARP activities, the qualifying populations, and King County's proposed HOME-ARP activities and allocations for each.

The Affidavit of Publication of King County's HOME-ARP public comment period and public hearing in the Seattle Times is included below as Attachment A.

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

To broaden public participation and reach organizations who may not see the public notice in the Seattle Times or on King County's website, King County sent an email notice on 3/22/22 to more than 180 organizations/agencies, including affordable housing developers and homeless service providers, inviting them to participate in the 15-day public comment period and/or the public hearing on 4/15/22.

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

No comments were submitted through the public comment process.

Representatives from four homeless or affordable housing providers or developers attended the public hearing on 4/15/22: United Indians of All Tribes, Valley Cities Behavioral Health, Multiservice Center, and Compass Housing Alliance.

Participants asked questions about who the three recommended projects would serve, as well as why King County was not using any HOME-ARP funds for supportive services. King County responded that it was using \$16 million in other COVID relief funds for supportive services and that any capital projects funded with HOME-ARP will have paired services funds from other sources.

Participants appreciated hearing more about King County's approach to pairing capital and services funds to ensure residents in all affordable housing sites have the supports they need. Participants expressed support for the three proposed projects and two people specifically noted that the shelter and permanent supportive housing planned in South King County are much needed.

One other question was asked regarding how King County would select a project for the remaining HOME-ARP fund balance. King County replied that the balance remaining for Development of Affordable Rental Housing would be offered in its 2022 Affordable Housing Capital Request for Proposals (RFP) in August 2022. King County will select a project that all four QPs will be eligible to apply for.

No accommodations were requested for the public hearing.

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

No comments were not accepted. King County is not using HOME-ARP funds for supportive services because it has other sources to fund services and needs HOME-ARP funds for capital activities. Agencies appreciated hearing King County's approach and commitment to funding services with other sources.

## **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            | 1,696             | 436        | 3,119       | #          | 75        |                              |                      |      |               |              |            |             |            |
| Transitional Housing         | 1,522             | 430        | 577         | #          | 107       |                              |                      |      |               |              |            |             |            |
| Permanent Supportive Housing | 1,280             | 425        | 4,969       | #          | 1,540     |                              |                      |      |               |              |            |             |            |
| Other Permanent Housing      | 1,328             | 335        | 403         | #          | 21        |                              |                      |      |               |              |            |             |            |
| Sheltered Homeless           |                   |            |             |            |           | 873                          | 3,397                | 414  | 376           |              |            |             |            |
| Unsheltered Homeless         |                   |            |             |            |           | 317                          | 3,825                | 399  | 835           |              |            |             |            |
| <b>Current Gap</b>           |                   |            |             |            |           |                              |                      |      |               | 1900         | 600        | 6300        | #          |

**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  | 382,770           |                 |                 |
| Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)                  | 36,780            |                 |                 |
| Rental Units Affordable to HH at 50% AMI (Other Populations)                        | 56,145            |                 |                 |
| 0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness) |                   | 51,700          |                 |
| 30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)      |                   | 23,575          |                 |
| <b>Current Gaps</b>   |                   |                 | 75,275          |

**Suggested Data Sources:** 1. American Community Survey (ACS); 2. 2014-2018 Comprehensive Housing Affordability Strategy (CHAS)

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

All data include Seattle and King County because the homeless data is collected that way and cannot be disaggregated. For consistency the housing data also includes Seattle and King County. King County will only spend HOME-ARP funds in King County outside of Seattle.

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

On the night of the 2020 Point in Time Count (PIT), 11,751 individuals were experiencing homelessness in Seattle/King County.<sup>1</sup> Among them, 53% were sheltered while 47% were unsheltered. King County is citing 2020 PIT data because it provides the most recent complete data for the needs and gap analysis. There was no count in 2021 due to COVID. The King County Regional Homelessness Authority (KCRHA) has not released full 2022 PIT data at this time. KCRHA has released the total PIT count of 13,368 homeless in 2022 but has not yet provided demographic data breakdowns by race, age, gender, chronically homeless, Veterans, and those fleeing domestic violence. The 2020 PIT data is the most complete data available.

**Racial Demographics**

Compared to the overall population of Seattle/King County, homelessness disproportionately impacts people of color. This is particularly prominent for individuals who identify as Black/African American (25% of those experiencing homelessness vs 7% of the Seattle/King County population), American Indian/Alaska Native (15% of those experiencing homelessness vs 1% of the Seattle/King County population), and Native Hawaiian/Pacific Islander (4% of those experiencing homelessness vs 1% of the Seattle/King County population). In addition, 15% of those experiencing homelessness identified as Hispanic, relative to 10% of the Seattle/King County population.

**Additional Demographics**

The following additional demographics of the homeless population include:

- 56% male, 41% female, 1% transgender, 2% gender non-conforming
- 29% chronically homeless
- 19% below the age of 18, 9% between 18-24, 72% over 25
- 32% families with children (adults and children)
- 7% veterans
- 10% individuals fleeing from domestic violence

**HMIS Data**

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<sup>1</sup> 786 of these individuals are youth and therefore not included in the data tables. Homeless adult count was 10,965.

The PIT is limited in capturing full homelessness data since it's a one-night snapshot of people experiencing homelessness. To more fully understand the state of homelessness in the community, King County's Department of Community and Human Services (DCHS) regularly analyzes and uses data from the Seattle-King County Homeless Management Information System (HMIS). Analysis of 2020 HMIS data shows that approximately 40,800 people—3.5 times the number in the PIT Count—experienced homelessness in Seattle/King County at some point over the course of 2020. Among them were roughly 8,900 households who were experiencing chronic homelessness.

As noted above, the 2020 PIT identified a subpopulation of 813 homeless Veterans or 7% of the homeless population. Of the veteran homeless population, about 80% were male, 57% white, 97% non-Hispanic, and 92% were 25 or older. King County does not have Veteran data for the other qualifying populations.

Both the PIT and HMIS numbers count people who are “literally homeless,” and do not capture those who meet the broader HOME-ARP definition of homeless. King County does not have data to capture all those meeting the HOME-ARP definition of homeless, but it would be higher than the 40,800 HMIS figure.

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

King County does not have data that perfectly align with HOME-ARP's “at risk of homelessness” definition. The closest data available is the most recent (2014-2018) Comprehensive Housing Affordability Strategy (CHAS) data produced by HUD which identifies 51,700 currently housed renter households in Seattle/King County at or below 30% AMI who have one or more severe housing problems.

Severe housing problems include:

- 1) housing unit lacks complete kitchen facilities;
- 2) housing unit lacks complete plumbing facilities;
- 3) household is overcrowded; and
- 4) household is severely cost burdened (Monthly housing costs including utilities exceeding 50% of monthly income).

This population is at high risk of homelessness, especially as rents increase, because they are extremely low income and vulnerable to losing their housing if they experience reduced work hours, unemployment, health issues, or the loss of access to health care and other services.

King County does not have information on how many of these households also 1) do not have sufficient resources to prevent them from moving to emergency shelter, and 2) meet one of the additional seven criteria in the HOME-ARP “at risk of homelessness” definition. Those “at risk of homelessness” for HOME-ARP purposes could be a subset of the 51,700 households in King County with incomes at or below 30% AMI having one or more severe housing problems, or it

could be larger than this figure based on the seven other criteria that are not captured by the CHAS data.

The racial demographics of this population include:

- 51.8% White, non-Hispanic
- 18.1% Black or African American, non-Hispanic
- 14.7% Asian, non-Hispanic
- 12.8% Hispanic, any race
- 1.4% Pacific Islander, non-Hispanic
- 1.2% American Indian or Alaska Native, non-Hispanic

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

The 2020 PIT Count identified 1,211 or 10% of individuals experiencing homelessness who were fleeing domestic violence. Of these, 70% were women and 25% identified as LGBTQIA+. Racially, this group is 36% American Indian, 40% White, and 20% Black or African American.

Domestic violence survivor counts are typically under-reports as peoples' safety is dependent on anonymity. During the stakeholder outreach process the Coalition Ending Gender-Based Violence shared anecdotal evidence about two different homeless shelters in South King County. One family shelter reported to the Coalition that 50% of its residents are fleeing domestic violence, and another reported that 30% to 40% of their intake line callers are fleeing domestic violence. This anecdotal evidence supports the assumption that official domestic violence counts among the homeless population (10%) are undercounts.

Other Data Limitations:

- PIT Count data does not capture people in the other HOME-ARP qualifying populations who are fleeing domestic violence.
- PIT homeless domestic violence data does not include people fleeing labor trafficking, as HUD's HOME-ARP DV qualifying population definition does.

Due to these data constraints, King County's count of 1,211 individuals fleeing domestic violence is an undercount of the broader qualifying population defined by HOME-ARP.

***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***

King County does not have data that fully captures HOME-ARP's "Other Population." King County is using a population category from HUD's CHAS data as a proxy for this population, understanding that it may not align fully with the HOME-ARP definition.

The most recent CHAS data identified 23,575 currently housed renter households in Seattle/King County between 30%-50% AMI who have one or more severe housing problems. Severe housing problems include:

- 1) housing unit lacks complete kitchen facilities;
- 2) housing unit lacks complete plumbing facilities;
- 3) household is overcrowded; and
- 4) household is severely cost burdened (Monthly housing costs including utilities exceeding 50% of monthly income).

The racial demographics of this “Other” population include:

- 59.2% White, non-Hispanic
- 14.9% Hispanic, any race
- 12.2% Asian, non-Hispanic
- 11.3% Black or African American, non-Hispanic
- 1.4% American Indian or Alaska Native, non-Hispanic
- 1% Pacific Islander, non-Hispanic

***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):***

As of the 2020 HIC, King County including the City of Seattle, has 4,815 emergency shelter beds, 2,099 transitional housing beds, and 964 rapid-rehousing beds. There are 5,394 units of permanent supportive housing and 739 units of other permanent housing.

King County’s Health Through Housing (HTH) program will have both emergency housing and permanent supportive housing of 1,600 units coming online that will include services.

The three Public Housing Authorities serving Seattle and King County have 1,314 emergency housing vouchers, combined, to assist people who are homeless, at risk of homelessness, or feeling domestic violence including labor trafficking.

King County has approximately \$25.8 million from several sources available in its 2022 Affordable Housing Capital RFP for the development and preservation of affordable housing. Funds included can serve all four HOME-ARP qualifying populations. The County also has approximately \$15 million available annually for Operating support, Rental assistance, and Supportive services (ORS). Most of these funds support continuing operations and services for projects already operating. Some funds are available to pair with new projects seeking capital funds. The King County Housing Authority has made 50 Project-based Housing Choice Vouchers available for PSH projects seeking King County capital funds in 2022 that will serve low-income households experiencing homelessness.

King County has allocated approximately \$16 million of CDBG-CV and ESG-CV for supportive services.

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

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

Given the snapshot limitation of the PIT count, King County uses HMIS data to more accurately count the annual homeless population. During 2020, King County's HMIS reported 40,800 people who experienced homelessness. At some time during that year, 40,800 people did not have housing, reflecting an unmet housing need.

The top three services most used by individuals experiencing homelessness in the 2020 PIT count were free meals (58%), bus passes (41%), and hygiene services (40%). Sheltered homeless used more services than unsheltered; almost 100% of sheltered individuals reported using at least one service compared to 86% of unsheltered individuals. Ten percent of the overall homeless population in the PIT said they do not use any services. Their top reasons for not using services include feeling unsafe (14%), over-crowdedness/bugs/germs (11%/11%/10%), and not feeling culturally accepted (6%). For the PIT, 10% of homeless individuals are not using any services, and the unsheltered who do use services are not using them as frequently as sheltered homeless.

Of those experiencing homelessness in 2020, approximately 8,900 households were chronically homeless. These individuals need the deep services provided by permanent supportive housing (PSH) and represent an unmet PSH need of 8,900 units and the services needed to support them.

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

According to most recent CHAS data, there are at least 51,700 extremely low-income renter households (under 30% AMI) with one or more severe housing problems. This population has housing but is at high risk of becoming homeless especially as rents are increasing and eviction moratoria have been lifted. Any challenges, from a reduction in work hours or unemployment, to health issues or loss of services are significant risks to these individuals and households becoming homeless.

This population needs more affordable housing to reduce rent burden and be more stably housed, as well as a range of programs and services to prevent them from becoming homeless.

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

As discussed above, 1,211 or 10% of homeless people in the 2020 PIT were also fleeing domestic violence, and this is very likely a significant undercount. Of these, 835, or 69%, were unsheltered, indicating an unmet need for DV shelter. Given the undercount and rising rates of

domestic violence driven by COVID isolation, the unmet need for shelter and services is likely much higher than 835 shelter beds/units serving people fleeing domestic violence.<sup>2, 3</sup>

As noted earlier, the data does not include people fleeing labor trafficking. That data would also likely drive a higher need.

***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***

The most recent CHAS data report 23,575 very low-income renter households (between 30%-50% AMI) who also have one or more severe housing problems. While these households are currently housed and are not at greatest risk of homelessness since their incomes are a little higher than extremely low-income households, they face high housing instability in a rising rent environment. They are vulnerable to losing their housing if they encounter employment or health problems and do not have social networks that can provide them help.

The CHAS data does not include information on whether this under 50% AMI population meets one of the seven criteria in the “at risk of homelessness” criteria, also required by in the “Other Populations” definition who are at 50% AMI.

These households need more affordable housing and access to ongoing health and other services to reduce their rent burden and increase their housing stability.

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

Approximately 47% of people experiencing homelessness are unsheltered at any given time, indicating a gap and need for more shelter space throughout the County. As noted above, approximately 10% of homeless in the 2020 PIT count did not access any services.

The 2020 Point in Time Count for Seattle/King County showed 11,751 individuals experiencing homelessness. Subtracting those who were in transitional or rapid rehousing leaves a gap of 6,900 (600 family sized units needed and 6,300 individual units needed) units needed to house the 8,200 individuals who needed housing on that night.

The real system housing gap is larger than those 6,900 units. As noted above, 2020 HMIS data report that 40,800 individuals experienced homelessness at some time in that year. Of those, 8,900 households were chronically homeless, indicating a system gap in 2020 of 8,900 units of permanent supportive housing.

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<sup>2</sup> Domestic Violence Patterns in King County, WA; March-September 2020 [{Link}](#)

<sup>3</sup> “Supporting Survivors of Domestic Violence During COVID-19,” Public Health Insider, Seattle-King County Public Health [{Link}](#)

In 2018, King County’s Regional Affordable Housing Task Force (RAHTF) set a goal for the region to build or preserve 44,000 affordable homes to serve people earning less than 50% AMI by 2024.<sup>4</sup> King County’s Department of Community and Human Services has estimated a cost of \$20 billion to build, preserve, and operate these homes.

***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:***

Based on stakeholder input King County is adding people with disabilities, including but not limited to Intellectual and Developmental Disabilities (IDD) to the “Other Populations” category. We heard from service providers that the housing system does not provide enough housing and services at scale that are appropriate for people living with IDD. Most often, this population is dependent on family or small group homes for housing and care, and are at greater risk of homelessness if family is not able to care for them.

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

The priority needs among the qualifying populations are for shelter space for homeless populations, including shelter specifically for those fleeing domestic violence, and for permanent supportive housing that follows Housing First principles, to move homeless households into permanent housing with the comprehensive services they need to ensure their housing stability. Another priority is for permanent affordable housing serving those with housing instability, and those with a range of disabilities including behavioral health and Intellectual and Developmental Disabilities (IDD), to improve their housing security and decrease their risk of becoming homeless.

***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:***

King County determined the level of need and gaps from the 2020 Point in Time Count, HIC data, 2020 CoC HMIS data, and King County’s 2018 RAHTF analysis. As noted, the needs and gaps indicated by the PIT is limited to one night, so King County has relied on HMIS data for an entire year, as well as CHAS and RAHTF data to determine the fuller level of need and gaps in the system.

In addition, King County received through its stakeholder consultation and public hearing input concerning significant gaps and needs for homeless shelters, domestic violence shelters, and PSH to permanently house and provide deep services to vulnerable, homeless households. Stakeholders expressed support for prioritizing HOME-ARP funds for capital activities to acquire and develop non-congregate shelter and develop affordable rental housing. Stakeholders

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<sup>4</sup> Regional Affordable Housing Task Force [{Link}](#)



expressed the need for a range of permanent housing, from permanent supportive housing to housing for those with disabilities who are not previously homeless.

## **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:***

King County recommends three projects for HOME-ARP funding to date, contingent on HUD approval of the HOME-ARP Allocation Plan. King County anticipates selecting a fourth project through its 2022 Affordable Housing Capital RFP, published on 8/8/22.

Two projects were selected in King County's 2021 Affordable Housing Capital RFP. This annual RFP combines a variety of fund sources that can be used to develop several types of affordable housing and housing serving a range of populations including homeless, Veterans, and people fleeing domestic violence. The HOME-ARP funds were not available when this RFP was initially published but became available and were added during the procurement process and King County selected two projects that aligned with two HOME-ARP Qualifying Populations: 1) Homeless and 2) Fleeing Domestic Violence. These projects are 1) DESC Burien Permanent Supportive Housing and 2) LifeWire Domestic Violence shelter.

King County also had an opportunity to acquire the Federal Way Red Lion hotel in South King County to convert it to non-congregate homeless shelter. The City of Federal Way was very supportive of this purchase and use. King County recommends using HOME-ARP funds to rehabilitate this hotel into much needed shelter in South King County.

King County has offered the remaining HOME-ARP balance, contingent on approval of the Allocation Plan, in its 2022 Affordable Housing Capital RFP. Since the three identified projects all have limitations or preferences, King County has specified in the RFP that any project awarded HOME-ARP funds in 2022 have to be accessible to all four HOME-ARP Qualifying Populations. The RFP includes the link to the HOME-ARP Notice for Qualifying Populations definitions and requires applicants to indicate which QPs can apply to, or be referred for application to, its project.

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

The only project that King County will administer directly is the Federal Way Red Lion. The County has purchased the site and intends at this time to contract directly for the rehabilitation work to prepare the site for use as a shelter. The shelter operations will be carried out by Catholic Community Services. All other HOME-ARP projects will be administered by sub-recipients.

***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:***

N/A

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                                    | \$ 0                  |                             |                        |
| Acquisition and Development of Non-Congregate Shelters | \$ 6,200,000          |                             |                        |
| Tenant Based Rental Assistance (TBRA)                  | \$                    |                             |                        |
| Development of Affordable Rental Housing               | \$ 6,121,525          |                             |                        |
| Non-Profit Operating                                   | \$ 0                  | 0 %                         | 5%                     |
| Non-Profit Capacity Building                           | \$ 0                  | 0 %                         | 5%                     |
| Administration and Planning                            | \$ 1,480,170          | 10.7 %                      | 15%                    |
| <b>Total HOME ARP Allocation</b>                       | <b>\$ 13,801,695</b>  |                             |                        |

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

In alignment with the priority needs identified in the needs and gap assessment, King County will allocate \$6,200,000 (45%) of HOME-ARP funds for the acquisition and development of non-congregate shelters and \$6,121,525 (44%) for the development of affordable rental housing including permanent supportive housing.

King County will allocate \$1,480,170 (10.7%) for administration and planning.

King County decided not to allocate any HOME-ARP funds for supportive services because at least \$16 million has been allocated to services from CDBG-CV and ESG-CV sources. In addition, King County pairs services with capital allocations and will continue to balance these needs as it makes capital funding awards.

***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:***

King County reviewed the needs and gap data for shelter and affordable rental housing, the available resources and investments from other sources for all eligible activities, and the input received from stakeholders working with people experiencing homelessness, domestic violence, and housing insecurity. The data and stakeholder input demonstrate significant resource gaps across all HOME-ARP eligible activities, and a particular need for shelter and permanent supportive housing (PSH) investments in South King County which has very limited shelter as well as limited PSH. Stakeholders also expressed gaps in East King County where there is some recent investment in shelter and PSH but more is needed.

HOME-ARP investments in non-congregate shelter will help address the needs for shelter and services of the 47% of homeless people who are unsheltered, including people fleeing domestic violence and human trafficking. As COVID has shown, non-congregate shelter is critical for

ensuring the health of homeless populations. Additional shelter units are needed throughout the County but more critically in South King County.

HOME-ARP investment in affordable rental housing and permanent supportive housing will address the needs of some of the 40,700 individuals who experienced homelessness throughout 2020. High quality permanent supportive housing can help address the needs of people who are homeless and provide the deep and comprehensive services needed for those experiencing behavioral health and substance use conditions found at higher rates among the chronically homeless (8,900 households in 2020 HMIS data). King County has invested other resources through its Health through Housing program to purchase non-congregate hotel and motel sites for emergency housing and PSH. This investment will provide capital and operating funds for 1,600 units of emergency housing and PSH. This significant investment will only address approximately 18% of the 8,900 units of PSH needed throughout the County. HOME-ARP and other future investments are needed to continue addressing the PSH gaps.

HOME-ARP investments in non-PSH permanent housing will provide much needed units to stably house those at or below 50% AMI with one or more housing problems, including severe rent burden. The King County RAHTF set a goal of building or preserving 44,000 affordable units between 2019 and 2024 to meaningfully address this need.

## **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:***

King County estimates its HOME-ARP recommended allocation plan will produce approximately 200 units of affordable rental housing in two separate projects. One project will provide permanent supportive housing with deep services to homeless populations, and the other project will provide units eligible to all four qualifying populations.

***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:***

King County estimates its HOME-ARP funds will create 200 affordable rental housing units. These units will address King County's priority needs by:

- 1) Creating 95 new units of permanent supportive housing (PSH) in South King County. King County will also contribute operating, rental, and services (ORS) funding to pair needed services dollars and provide comprehensive services to support chronically homeless populations and increase their housing security. The project will also leverage CoC funds, Federal 9% tax credits, King County Housing Authority Vouchers, and State

Housing Trust funds dollars. These units will provide some of the County's identified need for 8,900 units serving chronically homeless populations.

- 2) Another 100 units will be created in a yet to be identified affordable rental project whose units are accessible to all four qualifying populations. These units will help address King County's identified need for affordable housing for at least 75,000 renter households at or below 50% AMI with one or more severe housing problems. These populations include those at risk of homelessness and other populations who are at risk of housing instability. These units will also be accessible to people experiencing homelessness and fleeing domestic violence. These units can serve both homeless (40,800 households in need) and those who are housed but in need of housing that is more affordable or services to remain stably housed (75,000 need).

## 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:***

King County's HOME-ARP overall program will not exclude any of the four Qualifying Populations from eligibility to apply and be served. Three projects proposed for HOME-ARP funds have limitations as they will serve homeless or domestic violence populations (see Limitation questions below). All four QPs will be eligible to apply for, or be referred for application to, a fourth HOME-ARP project, yet to be identified. King County is soliciting this fourth project in its 2022 Affordable Housing Capital RFP, published 8/8/22.

HOME-ARP may consider the two homeless projects as having preferences:

- 1) DESC's Burien PSH project is limited to chronically homeless (described in Limitation section below) as required by its CoC funding. HOME-ARP may also consider this a preference since it will utilize the CE system, also required by its CoC funding. Of this project's 95 total units:
  - All 95 units are limited to chronically homeless
  - 70 of 95 units will serve people with disabilities under age 62
  - 25 units will serve chronically homeless Veterans
- 2) Federal Way Red Lion shelter is also limited (described in Limitation section below) to serving the most vulnerable homeless. Other QPs are not eligible to apply. HOME-ARP may also consider it a preference. While it does not use CE, selection of applicants/referrals will prioritize the most vulnerable homeless for shelter and services.

***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:***

The preference for serving chronically homeless in the DESC Burien PSH project will start to address the need for 8,900 units that serve chronically homeless households. Other homeless households who do not need the deep services provided by PSH may be able to access other affordable housing units.

Prioritizing the most vulnerable homeless for units in the Federal Way Red Lion Shelter will help triage and provide critical shelter services for those with the greatest needs. These 84 units will add to the inventory available and reduce the 47% of homeless who are unsheltered.

## **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):***

King County will use multiple referral processes for its HOME-ARP program depending on the specific type of project.

- 1) DESC Burien PSH project will use the CoC's CE system, Coordinated Entry for All (CEA), as required by its CoC funding. This is the only HOME-ARP project that will use CEA. All units in this project are limited to chronically homeless.
- 2) Domestic Violence Shelter will use the Domestic Violence Housing Access Point (DVCHAP) system. It is a coordinated referral system built by DV providers that exists separately from CEA and is acknowledged by the CoC as the coordinated DV referral process. DVCHAP takes referrals from DV and anti-trafficking providers for assessment and housing placements. DVCHAP is aligned with HOME-ARP's definition of those fleeing domestic violence and human trafficking as it includes referral organizations who work with people fleeing labor trafficking. The Domestic Violence Shelter will be accessible by those fleeing labor trafficking.
- 3) Federal Way Red Lion Shelter will select residents through homeless system referrals including from outreach and the Federal Way homeless day center. The day center serves and refers any homeless households of any configuration who present. Nobody is turned away. Referrals to the Federal Way Red Lion will prioritize the most vulnerable homeless for placement at the shelter.
- 4) A fourth project, to be selected, will be accessible for application/referrals from all four HOME-ARP qualifying populations.

***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):***

King County will use CEA for one of the four projects in its HOME-ARP program.

The DESC Burien PSH project will use CEA and will only serve chronically homeless populations, as required by its CoC funding. Only one qualifying population—homeless—will be

eligible to access this project and individuals must be chronically homeless. The project will serve a subpopulation of 25 chronically homeless Veterans.

The other three HOME-ARP qualifying populations will be able to access other King County HOME-ARP funded projects.

***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):***

King County's CEA serves all people (single adults, young adults, families, and veterans) experiencing homelessness and ensures that the highest need, most vulnerable households in the community are prioritized for housing and supportive services. Prior to 2019, households were prioritized for housing resources based on a formula that weighted a household's VI-SPADT score, how long they reported experiencing homelessness, and the length of time since the VI-SPADT had been entered into HMIS. Using the VI-SPADT score as the primary prioritization factor produced significant racial disparities.

To address these disparities and to quickly house people experiencing homelessness who are at high risk for developing serious and life-threatening health complications from COVID-19, on October 12, 2020, CEA began prioritizing households for each Priority Pool who were most disproportionately impacted by COVID-19. This process prioritizes households based on COVID-19 guidance issued by HUD and the Washington State Department of Commerce, and using factors determined by Seattle King County Public Health.

Case Conferencing is CEA's process for managing the group of currently prioritized households known as the Priority Pool. Case Conferencing is facilitated by Coordinated Entry for All staff and attended by service providers across the region who assist prioritized households with service matching, documentation preparation, connection to housing programs post-referral, and other supportive activities. In addition, housing providers who are receiving Coordinated Entry referrals are encouraged to attend weekly Case Conferencing meetings to inform, coordinate, and collaborate with the Coordinated Entry System's Case Conferencing attendees and CEA staff. Each week, as households are referred to housing resources, newly prioritized households will be brought into the Priority Pool based on the Coordinated Entry System Prioritization Methodology.

***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):***

N/A

In the one project that is using CEA, CEA is the only referral method.

**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:***

Yes, King County will limit eligibility for three HOME-ARP projects—two shelters and one permanent supportive housing project, as follows:

### **Non-congregate shelters**

- 1) King County recommends allocating HOME-ARP funds to a non-congregate Domestic Violence Shelter in East King County which will provide 25 shelter units for people fleeing domestic violence and human trafficking, including labor trafficking. The 2020 PIT data indicate that 1,211 homeless households were fleeing domestic violence. As discussed above this is likely a significant undercount. **The proposed project will limit admission to those fleeing domestic violence and human trafficking in order to provide the specific support and DV related services that are critical for this population's health and healing.** This deeper level of focused support is not typically

available in shelters serving homeless populations more broadly. By limiting access to those fleeing domestic violence and human trafficking, this project will provide the safe and trusting environment along with the range of health and counseling services this population needs for its safety and long-term health.

The shelter will not be open to any members of the other QPs who are not also fleeing domestic violence and human trafficking. A very high percentage of those fleeing domestic violence are also homeless.

This shelter will use a coordinated referral system. It is not CE and does include referrals for people fleeing human trafficking including those fleeing labor trafficking. See referral section for more details about this process.

- 2) King County proposes allocating HOME-ARP funds to a non-congregate homeless shelter in South King County (Federal Way Red Lion Shelter) because there are limited shelters operating in South King County. As 2020 HMIS data reported, 40,800 people experienced homelessness throughout the year. Typically, 47% of homeless are unsheltered and in need of shelter. This shelter will be limited to serving homeless and will prioritize the most vulnerable homeless for placement and services.

The Federal Way Red Lion was a hotel that will be rehabilitated to provide 84 units of shelter for homeless households. Its purpose is to shelter and provide services to those who are currently unsheltered. It will be limited to serving the homeless population including those fleeing domestic violence or human trafficking. It will not be open to people currently housed (At risk of homelessness QP or Other QP).

#### Affordable Rental Housing

- 3) King County proposes allocating HOME-ARP funds to a permanent supportive housing project in South King County (DESC Burien PSH project) that will provide 95 PSH units limited to chronically homeless households. This project has CoC funding, requiring all units to be filled by chronically homeless. CoC funding also requires the project to use CE. The project may serve those fleeing domestic violence who are also chronically homeless, but it will not be open to people who are currently housed (At risk of homelessness and Other QPs). HOME-ARP may also consider this project a “preference” since it will use the CE system. More information on the CE referral and prioritization system is provided in the Referral and Preference sections.

King County has a homelessness crisis and a gap of PSH units in the balance of County (outside the City of Seattle). King County’s Consolidated Plan needs assessment and 2020 HMIS data underline the need for at least 8,900 new units serving chronically homeless households. This project will provide critically needed PSH units along with the deep behavioral health and substance use services this vulnerable population needs to become healthier and stably housed.

The CoC's CEA referral and prioritization system complies with federal fair housing, civil rights, and nondiscrimination requirements.

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

See above response

***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):***

King County has offered the balance of HOME-ARP funds remaining for the development of affordable rental housing, after the three recommended project allocations, in its 2022 Affordable Housing Capital RFP, which includes multiple fund sources available for the preservation or development of affordable rental housing. King County intends to award the remaining HOME-ARP funds to an affordable rental housing project that is accessible to all four qualifying populations, thereby ensuring that its overall HOME-ARP program is accessible to all four QPs.

The 2022 RFP specifically states that any projects eligible for HOME-ARP funds must be eligible for applications from all four HOME-ARP qualifying populations.

## 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:

N/A, King County will not use HOME-ARP funds to refinance debt secured by multifamily rental housing.

- ***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***

Enter narrative response here.

- ***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.***

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

# The Seattle Times

## **AFFIDAVIT OF PUBLICATION**

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### **STATE OF WASHINGTON, COUNTIES OF KING AND SNOHOMISH**

The undersigned, on oath states that he/she is an authorized representative of The Seattle Times Company, publisher of The Seattle Times of general circulation published daily in King and Snohomish Counties, State of Washington. The Seattle Times has been approved as a legal newspaper by orders of the Superior Court of King and Snohomish Counties.

The notice, in the exact form annexed, was published in the regular and entire issue of said paper or papers and distributed to its subscribers during all of the said period.

03/18/2022

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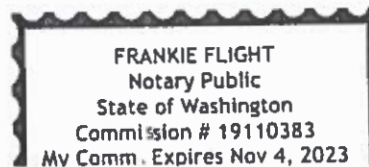
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03/18/2022

Frankie Flight

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**King County Substantial Amendment to  
the FY 2021 Annual Action Plan to add  
2022 HOME-American Rescue Plan  
(ARP) Funds**

**Public Comment Notice – Publication  
Period: April 4, 2022 – April 18, 2022.**  
The King County's HOME Consortium is  
providing notice regarding the ability  
for the public to comment on proposed  
uses of Federal HOME-ARP funding.  
The American Rescue Plan Act of 2021  
appropriated \$5 billion to provide hous-  
ing, services, and shelter to individuals  
experiencing homelessness and other  
vulnerable populations. The U.S.  
Department of Housing and Urban  
Development (HUD) allocated funds by  
formula to jurisdictions who qualified  
for HOME Investment Partnership Pro-  
gram Allocations in Fiscal Year 2021.  
King County was awarded \$13,801,695 of  
HOME-ARP funds in September 2021.  
2022 King County Draft HOME-ARP  
Allocation Plan  
Aligned with the HOME-ARP qualifying  
populations and eligible uses, King  
County's 2022 Draft HOME-ARP Alloca-  
tion Plan recommends funding for the  
following eligible activities:

- \$1,480,170 for Administrative, Plan-  
ning, and Environmental Review activi-  
ties
- \$5,800,000 for the Acquisition and  
Development of Non-congregate Shel-  
ter.
- \$4,521,525 for the Development of  
Affordable Rental Housing.

The Draft 2022 HOME-ARP Allocation  
Plan contains more details about the  
activities proposed for funding.

**Public Review and Comment**

The Draft 2022 HOME-ARP Allocation  
Plan will be available for public review  
between April 4, 2022 and April 18, 2022  
online at:  
[https://kingcounty.gov/depts/community-  
human-services/housing/plans-  
reports.aspx](https://kingcounty.gov/depts/community-human-services/housing/plans-reports.aspx)  
Comments on the Draft 2022 Action  
Plan must be submitted in writing and  
received no later than 5:00 p.m. on  
April 18, 2022 via email to Laurie Wells,  
[lauwells@kingcounty.gov](mailto:lauwells@kingcounty.gov).

**Public Meetings**

The public is invited to a Zoom meeting  
to review the Draft HOME-ARP Alloca-  
tion Plan. The meeting will be held  
Friday, April 15, 2022 from 3:00-4:00pm.  
Use the following Zoom meeting Infor-  
mation to join:  
Join by Phone: 1-253-215-8782  
Join Online (URL):  
<https://kingcounty.zoom.us/j/84850600440>  
Meeting ID: 848 5060 0440  
Passcode: 007300

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206-263-9092; TTY: 711 (Relay Service)**

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Attachment A