

**Miami-Dade County**

**HOME American Rescue Plan (ARP)  
Allocation Plan**

**June 30, 2022**

## 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:***

The Miami-Dade County Department of Public Housing and Community Development (PHCD) is the agency that is planning for proposed uses of HOME ARP funds, and will be the agency administering the funds. PHCD has consulted with those agencies that are involved in providing services to the four qualifying populations for HOME ARP funds. PHCD works closely with Nan McKay and HUD’s Veteran Affairs Supportive Housing (VASH) to assess the needs of veterans. PHCD consulted with Community Action and Human Services Department (CAHSD), the local agency that provides services for domestic violence victims. PHCD consulted with Miami-Dade Homeless Trust, which is the agency that administrates the Continuum of Care, and consulted with

other agencies in the Continuum of Care that provide services for the homeless in a series of conversations, e-mails and attendance at meetings regarding HOME American Rescue Plan (ARP) funds. PHCD also consulted with Casa Valentina, a local non-profit that serves clients that are aging out of foster care.

*List the organizations consulted:*

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Public Health Trust</b>	Quasi-governmental entity that is responsible for major public health system in County	Meetings in person and electronically	Identified a need to address the health needs of the most vulnerable populations in the County particularly the homeless and senior citizens.
<b>Miami-Dade Community Action and Human Services Department</b>	County Department	Electronically and in person	Need for additional funds to address those most economically vulnerable
<b>Miami-Dade Homeless Trust</b>	Quasi-County Agency	Electronically and in person	Need for additional homeless housing especially for seniors and housing for persons at risk of homelessness
<b>Commission On Disability Issues (CODI)</b>	County Advisory Board	Meetings in person and electronically	Need for more housing for persons with disabilities
<b>HOPE Inc</b>	Not for profit	Electronically	Consulted for fair housing data and data on the qualifying populations for Miami-Dade County, in addition to the Continuum of Care (CoC) data
<b>Veterans Administration</b>	Federal Agency	Electronically	Additional housing and services for veterans is needed, especially treatment services for hard to serve veterans
<b>Miami-Dade Public Housing and Community Development</b>	County Department, and the local Housing Authority	Spoke with Director responsible for overseeing housing development.	Identified continued initiatives to seek housing opportunities for the four qualifying populations through request for applications, and by utilizing public and private funding.
<b>Camillus House</b>	Not for profit	Electronically and attendance at Board meetings	Identified a need for more supportive housing for the homeless and those at risk of

		and telephone calls	homelessness. Camillus House is one of several homeless coordinated entry system providers that is utilized by the County.
<b>Casa Valentina</b>	Non-profit provider of housing and supportive services	Electronically	There is a continued need to house youth that are aging out of foster care. Miami-Dade County and Casa Valentina are working to redevelop existing residential housing for youth and other populations that are especially vulnerable and underserved, or are homeless or at risk of being homeless, such as youth aging out of foster care.

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

The agencies listed above provided Miami-Dade County with feedback and were active participants in the consultation process. In general, the feedback received was positive, with agencies providing insight on how to better serve their target populations. Please refer to the table above for specific feedback received.

**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: 7/1/2021***
- ***Public comment period: start date - 7/1/2021 end date - 7/15/2021***
- ***Date(s) of public hearing: 7/20/2021***

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

An advertisement was placed in the Miami Herald (newspaper of general circulation) and the Miami Times newspaper on July 1, 2021. The public comment period ended on July 15, 2021. The advertisement was also placed in the Creole and Spanish language newspapers to reach all of the major language groups in Miami; with the Le Floridien ad on July 1, 2021 and the Diario las Americas ad on July 2, 2021. The HOME ARP Allocation Plan was also placed on the County's calendar and website. An additional meeting was held on April 28, 2022 identifying actual projects proposed for funding. A copy of the advertisements are provided as an attachment.

At the public hearing on July 20, 2021, Mr. Ron Book, Chairman of the Miami-Dade County Homeless Trust spoke in support of the \$5,000,000.00 proposed for the acquisition and rehabilitation of Mia Casa, an existing senior homeless facility. He spoke of the lack of existing facilities for homeless seniors.

In order to provide more specific details about activities proposed for funding in the Miami-Dade County HOME ARP Allocation Plan, the County provided an additional newspaper publication. The advertisement for the public hearing included a list of actual projects proposed, and the advertisement was published in papers of general circulation and in English, Spanish and Creole. A public comment period was provided from April 13<sup>th</sup> through April 28, 2022.

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

PHCD staff attended Board meetings of the Miami-Dade County Homeless Trust and the Commission on Disability Issues, and with other County departments to inform the entities of the HOME ARP funding availability and asked that they also inform their clients. In addition, a second public hearing on the HOME ARP Allocation Plan was held on April 28, 2022.

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

The comments were commending PHCD's efforts to provide additional funding to those sectors of the community that often are not prioritized such as homeless seniors and persons with disabilities. A portion of the ARP funds will be utilized to help the homeless, including seniors and persons with disabilities. The Chair of the Homeless Trust thanked PHCD for this funding opportunity to assist the elderly homeless population.

Public comments were received in April, 2022 by electronic mail from Ms. Victoria Mallette, Director of the Miami-Dade Homeless Trust (HT). She stated a comment that projects must participate in the Continuum of Care's Coordinated Entry process. She also asked that the Homeless Trust be allowed to make referrals to the units so that they may prioritize persons experiencing homelessness before those at-risk.

At the April 7, 2022 monthly meeting, the Commission on Disability Issues requested that the County consider increasing the amount of funding available for developing housing for the disabled. PHCD responded that there are bonus points available in the 2021 Surtax/SHIP/HOME Request for Applications for proposed developments that seek to provide 6% or greater disabled units.

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

During the public comment period in April, 2022, the Miami-Dade Homeless Trust requested that additional funding be provided for Tenant Based Rental Assistance (TBRA). PHCD responded that TBRA funding is being provided as part of the Fiscal Year (FY) 2022 Community Development Block Grant, Home Investment Partnerships, and Emergency Solutions Grant Request for Applications.

Miami-Dade County will recommend, but will not require multi-family developers to participate in the Continuum of Care coordinated entry system, because the County does not intend to prioritize persons experiencing homelessness over the other qualifying populations, which also have substantial needs.

## **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**

<b>Homeless</b>													
	<b>Current Inventory</b>					<b>Homeless Population</b>				<b>Gap Analysis</b>			
	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	1091	317	1163	1163	20								
Transitional Housing	192	61	378	378	95								
Permanent Supportive Housing	1609	437	2849	2849	898								
Other Permanent Housing	115	32	181	181	145								
Sheltered Homeless						1054	1251	107	126				
Unsheltered Homeless						0	970	26	179				
<b>Current Gap</b>										0	0	680	680

**Data Source:** Miami-Dade County Homeless Trust, Shelter Inventory and Point in Time Count (PIT)

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

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

**Data Source:** Miami-Dade County Affordable Housing Framework, Comprehensive Housing Affordability Strategy (CHAS), U. S. Census Bureau

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

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

Miami-Dade County's most recent Point-in-Time (PIT) count took place on January 27, 2022. Outreach teams and staff, with support from lead agency staff, canvassed the entire geographic area of Miami-Dade County. A total of 3,276 sheltered and unsheltered homeless individuals were counted in January 2022, as compared with the total of 3,224 from January 2021. There was an increase in the number of homeless persons counted by 52 persons, a 2% overall increase in homelessness countywide when comparing the 2021 and 2022 PIT counts. The unsheltered count increased by 78 persons, or 9%, and the sheltered count decreased by 26 persons, or 1%.

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

As part of the PIT Count, the CoC reviewed at risk of homelessness subpopulations, including youth, veterans, households with and without children. An analysis over the past two years demonstrates the following as it pertains to these subpopulations:

- a) There was a 4% decrease in adults with a serious mental illness
- b) There was a 15% increase in adults with a substance abuse disorder

In the 2020-2024 Consolidated Plan, according to data provided by Miami-Dade County's Department of Regulatory and Economic Resources, 36,617 households containing at least one person at the age of 62 or above have an income level at 50% or below of the area median income.

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

PHCD consulted with the Community Action and Human Services Department, the service provider that provides a large portion of the human services in Miami-Dade County. Since the onset of the COVID-19 pandemic in February 2020, CAHSD domestic violence shelters have provided services to 1,177 program participants and the transitional housing programs have served 835 program participants.

***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***

As part of the PIT Count, the CoC reviewed homeless subpopulations, including youth, veterans, households with and without children, HIV/AIDS patients, and other families in need of services or housing assistance to prevent homelessness. An analysis over the past two years demonstrates that a total of 163 persons in the other populations listed below are in need of services and housing assistance:

- a) A total of 15 adults reported having HIV/AIDS, a 2% increase over the prior year
- b) A total of 75 veterans, a 1% increase over the prior year
- c) A total of 73 unaccompanied youth, a 2% increase over the prior year



***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):***

Current resources available to assist qualifying populations include Home Investment Partnership (HOME) tenant based rental assistance (TBRA), and Emergency Solutions Grant (ESG) program funds, which are being used for emergency shelter, homeless prevention and rapid rehousing. Emergency Solutions Grant CARES Act (ESG-CV) funds are being utilized by the Miami-Dade County Community Action and Human Services Department to provide support services for domestic violence victims. Through the ESG-CV allocation, a total of 226 households will receive monthly rental assistance, which includes 25 new households and 251 current households that are participating in the rapid rehousing program.

Community Development Block Grant (CDBG) funds are being used to assist qualifying populations with housing rehabilitation activities provided by the Greater Miami Service Corps., and Rebuilding Together Miami-Dade, Inc. CDBG funds are being utilized to provide the following public service activities to the qualifying populations:

- Branches, Inc. – financial counseling services
- Mujeres Unidas en Justicia, Educacion y Reforma, Inc. – services for women fleeing domestic violence
- Josefa Perez de Castano Kidney Foundation, Inc. – services to senior dialysis patients
- Assistance to the Elderly, Inc. – senior transportation services
- City of South Miami – senior meals program

The FY 2022-2025 3-year State Housing Initiatives Partnership (SHIP) Local Housing Assistance Plan (LHAP) continues Miami-Dade County's partnership with the State of Florida and the broader community to utilize SHIP, Federal, and Documentary Stamp Surtax funding to increase affordable housing supply. The following three strategies are provided in the proposed 3-year SHIP LHAP. These strategies are provided to assist individuals and households with housing.

1. Foreclosure Prevention and Mitigation
2. Rapid Re-Housing Program
3. Security Rental Deposit

The Emergency Rental Assistance Program (ERAP) is currently accepting applications for Miami-Dade County residents that are unable to pay an increase in rent. ERAP can help eligible residents pay the difference between current rent and the new rent for a period of 3 months.

As of April 7, 2022 the Miami-Dade County Continuum of Care (CoC) is utilizing 86 non-congregate shelter beds for seniors, 2,068 Emergency Shelter beds, 277 Transitional Housing beds, 5172 in Permanent Supportive Housing beds. However, there is a need for more supportive housing for the homeless and those at risk of homelessness.

The Miami-Dade County Homeless Trust which is led by a 27-member Board of Trustees that includes representation from the city and business community, elected officials, formerly homeless persons, religious leaders, homeless advocates and others, serves as the lead agency for Miami-Dade County's homeless Continuum of Care (CoC) and is responsible for the oversight, planning and operations of the entire CoC.

The Homeless Trust also conducts a summer census each August with the most recent one conducted on August 19, 2021. As with the 2021 PIT, the summer census also showed unsheltered counts at their lowest since 2014 and homeless totals (unsheltered/sheltered) that were among the lowest totals since the continuum began counting in 1996.

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

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

Miami-Dade County is addressing the homeless population as defined in 24 CFR 91.5. An individual or family who lacks a fixed, regular, and adequate nighttime residence is homeless. As of the Point-in-Time Survey completed for the period of 1/21/2021 through 1/27/2022, a total of 970 homeless individuals within Miami-Dade County are unsheltered, and total of 2,306 homeless individuals within Miami-Dade County that are sheltered. Emergency shelters continue to be at or near capacity limits. In addition, the qualifying populations also need mental health services, case management and financial counseling. Rental assistance is an ongoing need primarily due to the affordable housing crisis in Miami that affects the qualifying populations more acutely than the general population.

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

Miami-Dade County continues to have a housing affordability crisis, with a significant unmet need for affordable housing. According to the Miami-Dade County Affordable Housing Framework, 35% of households (300,000) as cost burdened that make less than \$35,000 per year as of 2021. Eighty-four percent, or 250,000 of these households are cost burdened, spending over 30% of their income on rent or a mortgage. As a result, a comparatively larger portion of the County's population faces lack of enough income to afford increasingly higher rents. The economic slowdown caused by COVID-19 has increased housing insecurity. The extremely low-income, and those who are living with family members temporarily are at a greater risk of housing instability. The unmet needs for those at risk of homelessness are mental health services, case management and financial counseling.

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

There is a need for housing, case management, financial counseling and health services for individuals fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking and human trafficking. In Miami-Dade County more than 7,000 people per year are at

risk of housing instability or in unstable housing situations from fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking. According to the Florida Department of Law Enforcement, in 2020, Miami-Dade County had 7,470 domestic violence offenses alone.

***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***

Extremely low-income individuals and households making 30% or less of the area median income, and are often at great risk of housing instability or are living in unstable housing situations. A disproportionate number of these individuals are minorities and the elderly, and unaccompanied youth. In the homeless needs assessment from the 2020-2024 Consolidated Plan, an estimated 286 veterans are experiencing homelessness. The unmet housing and service needs of other populations and other populations at greatest risk of housing instability are rental assistance, case management, and mental health services.

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

Emergency shelters within the Miami-Dade Continuum of Care (CoC) provide short-term emergency housing and care to homeless individuals and/or families with the objectives of housing crisis stabilization, housing need assessment and rapid re-housing. Providers of emergency shelter beds include Chapman Partnership, Camillus House, Lotus House and Miami Bridge provide emergency shelter housing and case management services. Emergency shelters for the homeless continue to be filled to capacity in Miami-Dade County. The Miami-Dade Homeless Trust identified a need to serve elderly homeless persons, and clients in need of tenant based rental assistance.

There is a gap in housing inventory for the disabled. Based on the 2016-2020 U.S. Census Bureau health statistics for Miami-Dade County, 5.9% of persons under the age of 65 have a disability. In consultation with Miami-Dade County Internal Services Department, we were notified that 15% of nursing home residents are under age 65, because nursing homes have become the de facto housing for disabled persons, some in their twenties and thirties, who either cannot get Medicaid waiver and/or find available accessible, affordable housing. During consultation, the Commission on Disability Issues identified a need for more housing for persons with disabilities.

Among the gaps of the delivery system is the dearth of organizational capacity, in the form of both financial capacity and human capital, of nonprofit groups and service providers to implement programs, projects, and activities. Further, a major weakness in the institutional delivery system is the relatively fragile financial state of many of the County's nonprofit housing developers and social service providers. Many of these groups have developed a dependency on County/federal funds for both operations and program services and have failed to cultivate and establish relationships with the corporate and foundation sectors to attract operating and programmatic capital to their efforts, thereby enabling them to further leverage the County's investment of federal funds. Without such efforts, these organizations are not able to create a viable financial model to

sustain their operations. As federal funding becomes increasingly scarce, this will have a corresponding impact on the ability of these fragile agencies to sustain their operations and to continue their important community revitalization efforts.

There is a need for more housing and services for victims of human trafficking and domestic violence.

***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:***

The 2020-2024 Consolidated Plan identified several characteristics associated with housing instability and an increased risk of homelessness:

1. a recent substantial rent increase throughout the County
2. overcrowding
3. failure of major mechanical systems, which leads to a municipal order to vacate that ultimately leaves owners or tenants homeless

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

The following priority needs were identified for the qualifying populations:

- Services for veterans and seniors
- Job training
- Rental Assistance
- Rapid Rehousing
- Case Management and Substance Abuse Counseling

***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 level of need and gaps in shelter and housing inventory and service delivery systems was based on information and data presented in the Miami-Dade County Fiscal Years 2020-2024 Consolidated Plan and the Point-in-Time Count by Miami-Dade Homeless Trust, as the lead agency in the Miami-Dade County Continuum of Care.

## **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:***

On April 8, 2021, the County received notice of a Home Investment Partnerships Program (HOME) ARP allocation of \$17,686,235.00 from U.S. Department of Housing and Urban Development (HUD) to provide near-term relief for people experiencing or at-risk of homelessness. The funding recommendations were proposed as a Substantial Amendment to the FY 2020-2024 Consolidated Plan and the FY 2021 Action Plan to the United States Department of Housing and Urban Development (HUD). The substantial amendment was advertised in three languages, in the Miami Herald, Diario las Americas and Le Floridien on July 1, 2021, and posted on PHCD's website. Public hearings were held on July 20, 2021 and April 28, 2022. The Miami-Dade County Board of County Commissioners (BOCC) subsequently approved resolution R-685-21.

PHCD consulted with the Continuum of Care and was advised of the need for shelters for homeless seniors. An existing housing site in the City of North Miami, known as Mia Casa, was selected by the Miami-Dade County Homeless Trust for acquisition.

PHCD utilized a request for applications (RFA) as a method to solicit applications for development of multi-family units for the qualifying populations. The FY 2021 Surtax/SHIP/HOME RFA application was made available to the public, and the application availability via the Department's website and through the Department's developers email distribution list. Prior to the issuance of the RFA, the Department solicited comments on a draft version of the RFA from the public via two developer's roundtable meetings. A public hearing for the allocation of HOME and HOME-ARP funding was held on July 20, 2021. After consultations with various agencies and service providers, whose clientele includes qualifying HOME-ARP populations, an additional public hearing was held on April 28, 2022, to provide an additional public comment opportunity and more detailed information on the proposed allocation of HOME-ARP funding.

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

Miami-Dade County Public Housing and Community Development will not administer eligible HOME-ARP activities directly. However, PHCD will conduct underwriting and monitor all HOME-ARP activities for compliance with federal regulations.

***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 HOME-ARP administrative funds have been provided to a subrecipient or contractor prior to HUD's acceptance of the 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	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 5,000,000.00		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 10,033,299.75		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 2,652,935.25	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 17,686,235.00</b>		

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

The total HOME-ARP allocation to Miami-Dade County is \$17,686,235.00, of which \$2,652,935.25 is to be used by PHCD for administration and planning costs. Up to \$10,033,299.80 in HOME-ARP funds are recommended for the development of affordable housing for the homeless or for those at risk of homelessness and was made available in the 2021 Surtax/SHIP/HOME Request for Applications. These funds will be used to address the needs of the four qualifying populations. Additionally, \$5,000,000.00 in HOME ARP funds is being recommended for the acquisition of the Eden Gardens/Mia Casa site by the Miami-Dade Homeless Trust. Mia Casa is an assisted living facility.

***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:***

After consulting with the Continuum of Care and reviewing the data provided, the need for more affordable housing for all four qualifying populations was identified. The gap analysis revealed that more affordable housing units are needed to support the homeless, veterans, domestic violence victims, youth aging out of foster care and those at-risk of homelessness. The information provided by the Continuum of Care and the service providers formed the basis for the HOME-ARP Allocation Plan. Miami-Dade County intends to use HOME-ARP to develop more affordable multi-family housing units for the qualifying populations, and to help acquire housing for homeless seniors.

A recurring need from the gap analysis is a lack of affordable housing, including extremely low income (ELI) housing as well as permanent supportive housing for the qualifying populations. There is generally a lack of health care services, particularly for those needing case management/mental health services and individuals with substance abuse issues.

## **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:***

Miami-Dade County estimates that 175 affordable rental housing units for qualifying populations will be produced with funding support from its HOME-ARP allocation. Three affordable rental housing development projects were awarded funding to provide up to 140 affordable rental units to serve the 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:***

Miami-Dade County's affordable rental housing production goal for HOME-ARP is 175 units. Miami-Dade County intends to issue a future request for applications with HOME-ARP funding available to solicit developers to provide an additional 35 units for the qualifying populations. Miami-Dade County has a goal of delivering the affordable housing by end of FY 2023. This production goal will address Miami-Dade County's priority need to provide affordable rental housing and supportive services for the four qualifying populations.



## 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).

The Coordinated Entry prioritization method utilized by the Continuum of Care is as follows:

- People over the age of 65
- Youth between 18-24
- Individuals fleeing domestic violence
- Disabled
- Homeless for over 4 years
- Persons with medical vulnerabilities

### **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:***

At the Mia Casa site, Miami-Dade County intends to prioritize the elderly subpopulation within all four qualifying populations. For the HOME-ARP multi-family rental housing projects, Miami-Dade County does not intend to give preference to one or more qualifying populations.

***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:***

Not applicable, as a preference was not identified.

### **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):***

At the Mia Casa site, Miami-Dade County intends to use the Continuum of Care as the coordinated entry system.

For the HOME-ARP multi-family rental properties the developers will use their established approved coordinated entry methods for tenant selection, and the County will strongly encourage them to work with the Miami-Dade Homeless Trust for referrals.

***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):***

Yes, all eligible qualifying populations will be included in the coordinated entry process.

***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):***

The Miami-Dade County Homeless Trust will provide the coordinated entry system for Mia Casa. The method of prioritization is as follows, seniors age 65 and older, and persons with compromised immune systems and underlying medical conditions, and who, according to the Centers for Disease Control, present a higher vulnerability to extreme complications or death from COVID-19.

***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):***

Not applicable.

### **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:***

Miami-Dade County does not intend to limit eligibility for HOME-ARP rental housing to a particular qualifying population or subpopulation of a qualifying population.

***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:***

Not applicable.

***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):***

Not applicable.

## HOME-ARP Refinancing Guidelines

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***  
Not Applicable.
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***  
Not Applicable.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***  
Not Applicable.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***  
Not Applicable.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***  
Miami-Dade County does not intend to allocate HOME-ARP funding for refinancing.
- ***Other requirements in the PJ's guidelines, if applicable:***  
Not Applicable.

Attachment A

Public Notices