

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 CHD Department works in collaboration with the Mobile Housing Board, the Continuum of Care (AL-501) and its member agencies, nonprofit and for profit housing developers, the Mobile County Health Department, the University of South Alabama, AltaPointe Mental Health Systems, Mobile County, Center for Fair Housing, Penelope House, McKemie Place, The State of Alabama, and subrecipient agencies on a variety of programs and projects, the majority of which are funded with CDBG, HOME, or ESG dollars. The CHD Department works with Housing First and the CoC to implement the HMIS system and Centralized Homeless Intake Center, design program participant intake assessment, and provision of referrals, and CHD also provides funding for CoC planning as requested. Other partnership activities include exploring ways to

create permanent housing for the homeless population. The City has worked with the Mobile Housing Board to include homelessness as a priority in their ACOP. The City, the CoC (through Housing First), and Mobile Housing Authority (MHA) met numerous times to discuss coordination of COVID response to their similar clientele. This included these funds in addition to Emergency Housing Vouchers that were awarded to MHA that utilize the CoC intake and referral systems.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Mobile Housing Board	Public Housing Authority	Public Hearing	Agreed to general coordination of COVID response including these funds.
Continuum of Care	Homeless Coalition	Public Hearing	Agreed to general coordination of COVID response including these funds.
Mobile County Health Department	Public Health Department	Public Hearing	No Comments
University of South Alabama	University	Public Hearing	No Comments
AltaPointe Mental Health Systems	Primary and Behavioral Health	Public Hearing	No Comments
The State of Alabama	State Government	Public Hearing	No Comments
Center for Fair Housing	Eliminating Housing Discrimination	Public Hearing	No Comments
Penelope House	Domestic Violence Shelter	Public Hearing	No Comments

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

Throughout the program year, the Community and Housing Development Department (CHD) works in collaboration with the Mobile Housing Board, the Continuum of Care and its member agencies, nonprofit and for profit housing developers, the Mobile County Health Department, the University of South Alabama, AltaPointe Mental Health Systems, Mobile County, The State of Alabama, and subrecipient agencies on a variety of programs and projects, the majority of which are funded with CDBG, HOME, or ESG dollars. Other projects are collaborative community efforts where the CHD is another stakeholder at the table which may or may not bring financial resources to the table, and sometimes we are in discussion to see how our funding efforts can complement those of other agencies. No additional comments or proposals received. The City, the CoC (through Housing First), and Mobile Housing Authority (MHA) met numerous times to discuss coordination of COVID response to their similar clientele. This

included these funds in addition to Emergency Housing Vouchers that were awarded to MHA that utilize the CoC intake and referral systems.

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: 11/7/2021***
- ***Public comment period: start date - 11/7/2021 end date - 12/9/2021***
- ***Date(s) of public hearing: 11/18/2021***

Describe the public participation process:

The City encouraged citizens to participate in the development of the HOME-ARP Funds Allocation Plan and it was available for public inspection and comments for a period of at least thirty (30) calendar days. The Plan included the amount of assistance the City expected to receive, including grant funds and program income, and the range of activities that may be undertaken. The HOME-ARP Funds Allocation Plan was posted on the City of Mobile’s website and published in the local newspaper.

Describe efforts to broaden public participation:

Copies of the City’s Proposed HOME-ARP Funds Allocation Plan was available for inspection in the Community & Housing Development Department. A virtual Public Hearing and Technical Assistance Workshop was held on November 18, 2021 in order to obtain comments regarding the proposed use of funds and to accept any proposals for the possible use of funds. All interested parties who were unable to attend the public hearings were encouraged to submit written views, comments, or proposals to the City before December 9, 2021. Participants were encouraged to attend via Zoom, in-person, and by phone.

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

There were two formal published comment periods, each of which included a public hearing, HOME-ARP Allocation Plan. During the first public hearing, there were only questions pertaining to potential developments, how to participate in housing programs, and questions about sub-recipient applications to which the information was provided. The City received no written comments during the first comment period. During the second public hearing, there were no comments. Participants were encouraged to attend via Zoom, in-person, and by phone.

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

Due to no comments received, there were no comments rejected.

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			Vets		Family	Adults Only

	# of Beds	# of Units	# of Beds	# of Units	# of Beds	Family HH (at least 1 child)	Adult HH (w/o child)		Victims of DV	# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	#	#	#	#	#								
Transitional Housing	#	#	#	#	#								
Permanent Supportive Housing	#	#	#	#	#								
Other Permanent Housing	#	#	#	#	#								
Sheltered Homeless						#	#	#	#				
Unsheltered Homeless						#	#	#	#				
Current Gap										#	#	#	#

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	#		
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)		#	
Current Gaps			#

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

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

Homeless as defined in 24 CFR 91.5

The CoC conducted the annual Point-in-Time count (PIT) on Tuesday, January 25, 2022, with both daytime and evening counts and 585 persons were counted of which 75 were veterans. On January 28, 2022, Project Homeless Connect was held to provide essential life social services for 259 persons who were identified as homeless.

At Risk of Homelessness as defined in 24 CFR 91.5

2,571 persons were served through all CoC funded projects. Through the CARES Act (ESG-CV) 389 households received assistance and 279 households, who were facing eviction and at risk of homelessness, received assistance through the American Rescue Plan rental & utility assistance programs.

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

Victims of domestic violence who leave an abusive situation and seek shelter for themselves and their children often times become homeless because they are no longer safe at home and have no other safe place to live. In 2022, 288 persons fleeing or attempting to flee domestic violence were served by the community's domestic violence shelter. Through comprehensive case management services, clients receive court advocacy, child care/advocate counseling, and referrals to other community resources. The City's goal is to provide affordable, sustainable, and safe housing for individuals and their children.

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 National Low Income Housing Coalition states solutions are needed to address the nation's affordable housing crisis. According to U.S. Census Bureau 2020 census, 20.1% of the population within the City limits are at or below poverty, coupled with the median gross rent of \$849.00; affordable housing is the greatest need. In response to the introduction of Emergency Housing Vouchers (EHV), as made available through the American Rescue Plan, the CoC partnered with the Mobile Housing Authority to support the transition of 49% of formerly chronically homeless persons from their Permanent Supportive Housing Program to housing independence. The fair market rental rate for the 3-bedroom unit is \$1,148, which is out of reach for a low to moderate-income household. Across Alabama, there is a shortage of affordable rental homes available to extremely low-income families, whose incomes are at or below the poverty guideline or 30% of their area median income. Many of these households are severely cost-burdened, spending more than half of their income on housing. Severely cost-burdened low-income families are more likely than renters to sacrifice necessities like healthy food and healthcare to pay the rent and experience unstable housing situations like evictions. In Alabama, 181,179 or 31% of renter households are extremely low income. \$26,200 is the maximum income for a 4-person extremely low-income household (state-wide), of which 67% of extremely low-income renter households with severe cost burden. The rental housing market in the Housing Market Area (HMA) is

balanced, with an overall estimated vacancy rate of 8.5 percent, down from 11.4 percent in April 2020. Apartment market conditions are also flat, with an 11.7-percent vacancy rate during the third quarter of 2021, compared with 13.6 percent a year earlier. According to the Thirteenth Judicial Circuit Court of Alabama, services Mobile County, in 2021, closed 1309 eviction cases that have received an eviction notice, an unlawful detainer, or an eviction court appearance. As of June 2022, through legal representation by Legal Services Alabama 522 households either received an eviction notice, an unlawful detainer, or an eviction court appearance, of which 214 female-headed single-parent households, 13 male-headed single-parent households, 22 married with dependents, 11 married without dependents, 17 other, 228 single adults, and 17 two or more unrelated adults.

A recent study by Up for Growth as presented by NPR has identified the City's housing inventory as adequate when reviewing numbers alone. This doesn't factor in those units that are not habitable or those that are known to be coming offline in the near future. In 2022, the City identified 852 blighted properties. Additionally, with the impending demolition of Thomas James Place and R.V. Taylor Plaza, two public housing units (739 buildings and 1,246 units) are displacing hundreds of families supporting the need for affordable housing. In coordination with the Mobile Housing Board, nonprofit and for-profit developers and the City of Mobile, the HOME-ARP funds will focus on developing affordable rental housing. The City has observed a dramatic increase in market rent rates and lack of construction supplies by the private market which has made many units that were affordable prior to COVID no longer affordable. The combination of these factors has greatly reduced access to safe, decent, and sanitary affordable housing.

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):

Enter narrative response here.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

The unmet housing need for the homeless population is housing, followed by the need for regular meals and adequate clothing. Coordination with community shelters, facility improvements/expansion, bedding, blankets, food, and unrestricted funds. Physical needs revolve around access to health care, mental healthcare, surgical, dental services, and substance use treatment. The homeless need steady income, transportation, job training, socialization needs, education, and employment. The sense of belonging concerned a lack of supportive relationships with relatives and friends contributes to depression and low self-esteem. Through comprehensive case management services, individuals and households can be linked to community resources to address these unmet housing and service needs.

At Risk of Homelessness as defined in 24 CFR 91.5

The unmet housing need for individuals who are at risk of homelessness is affordable housing and housing education. Housing counseling addresses homelessness through counseling and assists homeowners and renters in need of foreclosure assistance, budgeting, credit repair, pre-purchase & post-purchase housing counseling, debt management, and other financial situations individuals and families go through. Through legal representation, over 500 program participants received preventive financial assistance avoid further housing instability or homelessness.

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

The unmet housing need for victims of domestic violence is affordable housing where they can feel safe from the abuser. Legal services, health care, child care, and laws to protect them from the abuser. Advocates and survivors identify housing as a primary need of victims and a critical component in survivors' long-term safety and stability.

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

Affordable housing is essential to housing stability. Housing counseling addresses homelessness through counseling and assists homeowners in need of foreclosure assistance. As stated above, in 2021, closed 1309 eviction cases that have received an eviction notice, an unlawful detainer, or an eviction court appearance. As of June 2022, through legal representation by Legal Services Alabama 522 households either received an eviction notice, an unlawful detainer, or an eviction court appearance, of which 214 female-headed single-parent households, 13 male-headed single-parent households, 22 married with dependents, 11 married without dependents, 17 other, 228 single adults, and 17 two or more unrelated adults. The COVID-19 pandemic adversely affected low-to-moderate income individuals. Many felt the reeling negative economic impacts due to reduction or total loss of income. During the course of the Pandemic, over 500 households have been served and able to remain housed. Through comprehensive case management services, clients receive assistance paid on their behalf to landlords and service providers, and referrals to other community resources. The City's goal is to ensure access to affordable, sustainable, and safe housing for families and individuals and to avoid having families added to the homeless population.

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

In 2021, the CoC reported 456 year-round beds households without children and 468 year-round beds with children both with utilizations of 100% indicating a possible need for more

shelter beds. These numbers indicate a lack of congregate shelter units. In 2022, the City identified 852 blighted properties which reduce the number of available housing stock for occupancy.

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:

Households that have previously been homeless, households that are no longer able to obtain affordable housing due to market conditions, or would be homeless if not for temporary or emergency assistance. Households that are at greatest risk of instability due to being at or below the 50% Area Median Income, living in an overcrowded environment, or received a notice to vacate.

Identify priority needs for qualifying populations:

Priority needs identified for qualifying populations included affordable housing, emergency shelter, and permanent housing, rental and utility assistance, legal services, mental health services, and case management. Decent affordable housing options is paramount.

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 City of Mobile, like many other areas across the country, has a shortage of decent affordable housing. Therefore, individuals who typically are at or below 30% of the Area Median Income are forced into living in sub-standard conditions all while being rent-burdened.

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:

A combination of methods has been and will be used to solicit developer proposals for affordable housing to respond to the previously described shortage of units. These methods include RFPs, RFQs, and direct responses from developers based on advertising through the City website, email notification to a known list of potential developers. This funding is planned to

be utilized in coordination with other federal COVID response funding which will provide direct services to clients and beneficiaries for other identified needs.

Describe whether the PJ will administer eligible activities directly:

The City will administer these funds directly through its Community and Housing Development Department.

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

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ #		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ 2,621,081.00		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 462,543.00	# %	15%
Total HOME ARP Allocation	\$ 3,083,624.00		

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

As described previously, the City has identified affordable housing units as its overwhelming need due to a combination of issues, including an overall increase in rental rates in the private sector, and reduction in landlords’ acceptance of housing choice vouchers, lack of decent affordable housing units due to deterioration. HOME-ARP funds will be coordinated with other federal funds including Treasury ARP funds that are programmed to assist with rental and utility assistance and other HUD funding that is being utilized to provide public services.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The City is planning to provide funding to developers for the purpose of building decent affordable housing due to the identified general lack of these units. The units would be constructed by developers and rented to those that meet HOME-ARP eligibility criteria as part of the qualified populations. The City will inspect and directly monitor sites for compliance. The City will also require an Affirmative Marketing Plan as it does with any project of 5 units or more.

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:

Based on the latest traditional HOME subsidy limits, per HUD, the City estimates up to twenty-four three-bedroom units, thirty two-bedroom units, thirty-six one-bedroom units, or a combination of one, two, and three-bedroom units that are in compliance with the HOME subsidy limit. Final amounts will be determined based on developer proposals.

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

As described previously, the City plans to leverage the funding from HOME-ARP to fund construction of many more units than the funding would allow for otherwise. The direct goal of rental housing production with this funding is 24 units.

Preferences

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

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

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

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

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

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

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

Template:

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

No preference is provided.

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:

No preference is provided, no explanation is needed.

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):

N/A

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):

N/A

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):

N/A

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

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:

No Limitation eligibility is provided.

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:

No limitation eligibility is provided, no explanation is needed.

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):

No Limitation is identified, no description is needed.

HOME-ARP Refinancing Guidelines

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

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

No funds will be refinanced.

- ***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.***

N/A

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

N/A

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

N/A

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

N/A

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

N/A