

HOME-ARP Allocation Plan Template

Guidance

- To receive its HOME-ARP allocation, a PJ must:
 - Engage in consultation with at least the required organizations;
 - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further Fair Housing;
 - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - Anti-Lobbying;
 - Authority of Jurisdiction;
 - Section 3; and,
 - HOME-ARP specific certification.

Participating Jurisdiction: North Shore HOME Consortium / City of Peabody

Date: 4/25/2022

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and 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, at a minimum. 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.

Summarize the consultation process:

In an attempt to obtain feedback from the greatest number of people, the North Shore HOME Consortium (NSHC), conducted extensive outreach to social service agencies, emergency shelters, domestic violence agencies, veterans agencies, CAP agencies, mental health agencies,

all area local and regional housing authorities, disability service providers, and anti-poverty agencies in the region. Although no longer the convener of the North Shore CoC, the NSHC remains involved, both in the Balance of State CoC and in homeless and antipoverty concerns in the region, and continues to maintain contacts with the people and agencies who provide these services. Four community meetings were held to invite direct conversations on the possible uses and preferred procedures to direct the new ARP funding in a way that would best serve the region.

The first community meetings were conducted at the Haverhill Public Library on May 17th, 2022; at the Torigian Community Life Center on May 18th, 2022; at the Sawyer Free Library on May 19th, 2022 and a hybrid meeting at Peabody City Hall on May 26th, 2022 where attendees had the option of attending in-person or by using the Zoom platform.

Meeting notes are attached.

From these earlier meetings a draft Action Plan was developed and a series of public hearings were conducted. These hearings were held in person, at the Haverhill Public Library on Tuesday November 16th, 2022 ; at the Torigian Senior Center at 79-R Central Street in Peabody on November 17th; 2022 and on November 18th 2022 at the Sawyer Free Library, 2 Friend Street, Gloucester. An additional public online meeting was held via the Zoom platform on Thursday December 2nd 2022 to allow access for those who were unable or hesitant to participate in person and for those who preferred to participate remotely.

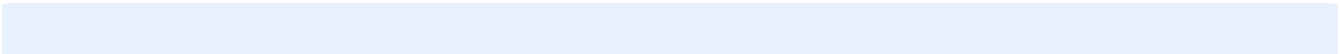
All eight of these meetings were advertised at least two weeks in advance in the four daily newspaper publications covering the region, as well as in the minority publications the Bay State Banner and El Mundo. The notice of meeting was placed online on the City of Peabody’s website and sent to all of the Consortium’s member communities by e-mail. Member communities were asked to share the information with any possible interested parties. Many who attended the public hearing meetings and the public hearings on the draft action plan were directed there by HOME program contacts. A direct mailing was sent out to all housing authorities in the region, as well as to organizations that address civil and fair housing rights. Additional direct phone outreach was made to local housing authority contacts, domestic violence service providers, organizations that assist survivors of human trafficking, veterans service agencies, other non-profits serving the target populations. Further outreach was conducted to affordable housing developers in the region to ensure that they were aware of these funds, and to ask for their participation in these discussions and/or for written comments to help inform the NSHC on the needs in the region and on the best way to utilize these new ARP funds.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
City of Haverhill Department of Community Development	Municipality	Attended Community Meeting	Great need for more affordable housing of different types

Ted Ammon, Private Housing Developer	Housing Development	Attended Community Meeting	Interested in developing affordable housing.
Jonathan Cozzens, private Housing Developer	Housing Developer	Attended Community Meeting	Need for more affordable housing, but need assistance to support smaller developers to create it
L'Arch Boston North	Agency operating homes, programs, and support networks with people who have developmental disabilities	Attended Community Meeting	Great need for more affordable housing, and to integrate housing for people with disabilities into developments
Haverhill YMCA	nonprofit organization/affordable housing developer/provider	Attended Community Meeting	Great need for more affordable housing, services, transportation for low income households. Looking to develop housing for families.
Emmaus	non-profit organization that provides emergency shelter and develops affordable housing	Attended Community Meeting	Great need for more affordable housing, looking to create housing for individuals
Town of North Andover Department of Planning and Community Development	Municipality	Attended Community Meeting	Need for more affordable housing; need to hold multiple rounds to access funds.
Shaw Rosen, Real Estate Development Consultant	Real Estate Development Consultant	Attended Community Meeting	Need for more affordable housing, need to make funds easier to access.

If additional space is needed, insert image of table here:



Public Participation

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.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

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

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:

- ***Public comment period: start date – The thirty-day public comment period on the draft action plan began in early November of 2021 and four public hearings were conducted as noted above. These included three in-person meetings in the community and one using the Zoom platform. More details will be included following the public hearings held in response to the draft plan. end date - 5/17/2022***
- ***Public hearing: 11/17/2022***

Enter narrative response here.

Describe any efforts to broaden public participation:

The PJ, (the North Shore HOME Consortium) conducted extensive outreach activities using e-mail invitations to all of the Consortium’s member communities, using newspaper ads in local and regional publications, using paper mailings including invitations to comment to all local housing authorities, organizations serving survivors of domestic violence, organizations serving survivors of human stalking, organizations serving persons with disabilities and all local veterans organizations. In order to increase equity, diversity and inclusion, the local chapter of the National Association for the Advancement of Colored People [NAACP] based in Lynn, MA, was also encouraged to comment.

In addition, telephone outreach and personal conversations were conducted with all of the local emergency shelter organizations in this region, all of the three Community Action Programs and all of the local nonprofit housing development organizations who are currently engaged in the development of affordable housing were consulted. These were reasonably productive in engaging those who had not previously accessed HOME funds; some of these organizations have decided that their capacity is limited and may decide not to take on new activities. Almost all are interested in accessing funding for short-term supportive services and for short term tenant based rental assistance.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

These comments from the four community meetings and the subsequent four public hearings held for the purpose of reviewing the Action Plan are being included as attachments to this document.

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

Although there were suggestions about how to increase access to homeownership by using HOME-ARP funds to assist in that process, including more widespread downpayment assistance and outreach activities to promote homeownership – particularly to populations seen to be underserved, no HOME-ARP funds will be used for those purposes because promoting homeownership activities is not an allowable use for these funds.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. 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. The PJ may use the optional tables provided below and/or attach additional data tables to this 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	#	#	#	#	#								
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:

The North Shore HOME Consortium has identified the following number of people who fall within each of the designated qualifying populations:

1) Homeless:

At the date of the most recently completed homeless point-in-time count in our region, we had identified 568 homeless persons living in shelters and on the streets.

2) At risk of Homeless:

In order to best respond to this question, we looked at the definition to define “at risk of homelessness.” and the definition matches that of those who are unstably housed; in order to avoid duplication and to allow clear delineation of the groups involved, these responses will be covered under item 4 (2) below.

3) Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking:

According to the most recent statistics available for the state of Massachusetts and extrapolated for the North Shore HOME Consortium region, last year 1,295 persons contacted domestic violence service providers to request assistance to flee from domestic violence, sexual assault, stalking or human trafficking. Currently – although there are limited resources serving as “safe houses” to serve those who have survived human trafficking, there are no locations that allow a surviving mother to be reunited with her children.

4) Other populations:

Those not under the categories above but-

(1) those who were previously homeless but require services or housing assistance to prevent homelessness: Currently in the North Shore HOME Consortium region there are 629 households who were previously homeless and are now housed but are receiving housing assistance to allow them to remain housed in their current living situations.

(2) those at greatest risk of housing instability, that is,

(i) those with an annual income less than or equal to 30% of HUD AMI and experiencing severe cost burden (paying more than 50% monthly household income toward housing costs): According to the most recent CHAS data report through the U.S. Census bureau, in the communities in this region a total of 27,355 persons with annual incomes less than or equal to 30% AMI also were experiencing severe housing cost burdens.

(ii) those with an annual income less than or equal to 50% HUD AMI and meets one of the following “at risk of homelessness” definitions - (data for the below responses came from the three Community Action Programs (CAPs) covering our regions, reported from point of contact notes from those seeking assistance, resources, and referrals from those agencies.

(A) Has moved due to economic reasons two or more times during the past 60 days prior to application for homelessness assistance: While no data has been collected to show the number of times persons have moved,

the number of callers to CAP agencies who reported that they are temporarily living with friends and family is over twenty to thirty calls per week.

(B) Is living in the home of another because of economic hardship: a high volume of callers contact each of the local CAP agencies to report that they are living with friends or family due to economic hardship.

(C) Has been notified in writing that their right to occupy their current housing will be terminated within 21 days after date of application for assistance: While no useful data on notices to quit could be taken from our contacts at the regional CAP agencies, a report from MHP lists by community the number of eviction notices filed since the Federal Eviction moratorium expired in October of 2021, and there have been **638** eviction notices filed within the past year affecting households within the Consortium region.

(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations, or by the state, federal or local government programs for low income individuals: While there are no available statistics on the number of persons currently living in hotels or motels not supported by a program, our regional CAP agencies collect data from those calling to ask for assistance, including data about current living arrangements. While living in a hotel/motel is not one of the available responses, the category “other” was listed for at least fifteen families and thirty-four individuals in this region (categories included homeless in shelter, in scattered site shelter, renting with subsidy, renting with no subsidy, own a home, live with family and friends fixed, regular, safe, and temporary, and other permanent housing. “Other” is also the category that those who are homeless and paying their own motel or hotel bills are classified under).

(E) Lives in a single room occupancy or efficiency apartment unit in which there resides more than two persons, or lives in a larger unit that resides more than 1.5 persons per room as defined by US Census: According to the most recent CHAS data from the U.S. Census, 22,498 persons are living in severely overcrowded situations, that is, more than 1.5 persons per room.

(F) Is exiting a publicly funded institution or system of care (health care facility, mental health facility, foster care or other youth facility, or correction program or institution: Last year in this region 44,995 persons with incomes low enough to receive public health benefits exited from hospitals. Also last year, 199 persons exited from correctional facilities, 234 exited from foster care, and 60 persons exited mental health care facilities in this service area.

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the recipient's approved consolidated plan: No other housing types have been identified.

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

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

Unsheltered homeless:

Each of the unsheltered homeless persons identified in our count is in need of a safe, affordable housing unit; many of these will need supportive services. The types of services needed for this population include case management, health care, mental health services, alcohol/drug treatment programs, assistance with connection to mainstream resources (i.e.: social security disability assistance, financial assistance, food assistance programs) and in some instances, job training and financial management assistance.

Sheltered Homeless:

Each of the sheltered homeless persons in our region need permanent safe, affordable housing. The sheltered homeless in our region would benefit from and become stabilized with supportive affordable housing. Sheltered homeless in our region receive services and supports while in shelter, but would benefit after leaving shelter, if not provided supportive housing, from long term case management, financial assistance, mental health care, food pantries and other food services, alcohol and drug treatment programs, and legal services.

Currently Housed Populations who are at Risk of Homelessness: see section, "those at greatest risk of housing instability or in unstable conditions" below.

Those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking: In addition to access to safe, affordable housing, each person attempting to flee is likely to need of additional supports including financial assistance, food assistance, mental health care, financial management assistance, and legal assistance.

Other populations: Those not under the categories above but

(1) those who were previously homeless but require services or housing assistance to prevent homelessness - Those in permanent supportive housing need to have those services connected

to their housing continue, from food services and financial assistance to healthcare and mental health services. Additional services needed include legal assistance, job training/coaching, tenancy preservation training, financial management assistance.

(2) **those at greatest risk of housing instability**, that is,

(i) those with an annual income less than or equal to 30% of HUD AMI and is experiencing severe cost burden (paying more than 50% monthly household income toward housing costs): Those extremely low-income households with very high housing cost burdens who are renters may be assisted by one of two interventions, either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. For those who own their own properties but fall into this category there is little that can be done aside for placement in an affordable appropriate affordable unit. Some at past public community meetings have suggested the options of setting up programs to renovate homes to allow seniors who are over-housed to take in boarders or to renovate oversized housing to create multiple units on the site to defer their housing costs. However, it has been found that zoning regulations do not allow these changes in most areas, but it is worth noting that in some cases, homeowner rehabilitation may be a way to assist extremely low-income homeowners to stay housed and to create additional affordable housing units.

(ii) those with an annual income less than or equal to 50% HUD AMI and one of the following:

(A) Has moved due to economic reasons two or more times during the past 60 days prior to application for homelessness assistance: Households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(B) Is living in the home of another because of economic hardship: Households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short- or long-term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be

effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(C) Has been notified in writing that their right to occupy their current housing will be terminated within 21 days after date of application for assistance: Households may be assisted to retain their tenancy through housing assistance program interventions, and with legal services programs to help preserve their housing. In the event that this is not possible, households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short- or long-term rental assistance and housing search assistance to identify a unit. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include connection with mainstream resources and financial assistance.

(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations, or by the state, federal or local government programs for low-income individuals: Households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short- or long-term rental assistance and housing search assistance to locate a rental unit. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(E) Lives in a single room occupancy or efficiency apartment unit in which there resides more than two persons, or lives in a larger unit that resides more than 1.5 persons per room as defined by US Census: Households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short- or long-term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(F) Is exiting a publicly funded institution or system of care (health care facility, mental health facility, foster care or other youth facility, or correction program or institution: Households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short- or long-term rental assistance. For those

with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the recipient's approved consolidated plan:
No other such housing has been identified in this region.

Those Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking: In addition to access to safe, affordable housing, each person attempting to flee is in need of additional supports including food assistance, mental health care, financial assistance, and legal assistance.

Other populations: Those not under the categories above but -

(1) those who were previously homeless but require services or housing assistance to prevent homelessness: Those in permanent supportive housing need to have those services connected to their housing continue, from food services and financial assistance to healthcare and mental health services.

(2) those at greatest risk of housing instability, that is,

(i) those with an annual income less than or equal to 30% of HUD AMI and is experiencing severe cost burden (paying more than 50% monthly household income toward housing costs): Those extremely low income households with extreme housing cost burdens who are renters may be assisted by one of two interventions, either placement in appropriate affordable housing units or short or long term rental assistance. For those who own their own properties but fall into this category there is little that can be done aside for placement in an appropriate affordable unit. Some at past public community meetings have suggested the options of setting up programs to renovate homes to allow seniors who are overhoused to take in boarders or to renovate oversized housing to create multiple units on the site to defer their housing costs, but it has been found that zoning regulations do not allow these changes in most areas, but it is worth noting that in some cases, homeowner rehabilitation may be a way to assist extremely low income homeowners to stay housed and to create additional affordable housing units.

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:

In the North Shore HOME Consortium region there currently exist 464 emergency shelter beds in congregate and non-congregate scattered site programs. 386 scattered site and facility sited non-congregate beds are dedicated to families and 77 are congregate facility beds for individuals. Residents of these shelters are offered extensive services, including case management,

connection with mainstream resources, job training and education, financial management, and physical and mental health care. This is not accessed by those unsheltered homeless or unstably housed persons in our region, and is needed. The number of shelter beds in this region is far from adequate to meet the needs of the current population of homeless, as made clear by the number of people living out of doors and in places not meant for human habitation i.e.: cars and vacant buildings, a total of 60 individuals per our last unsheltered homeless count, and by the long lines of people seen lining up to get a bed at shelters that are forced to turn people away due to being at capacity from every location. In many cases unsheltered individuals have been barred from a shelter for one of many offences from possession of alcohol or drugs (or for being under their influence) to incontinence. Women without children are especially underserved in the shelters in our region, with extremely limited shelter space dedicated to this population. The other existing qualifying populations, if they are forced to seek out shelter, will not find space available.

Despite this, the main goal of the NSHC is not to create additional emergency shelter at this time, but to find other options to address these emergency needs, like the use of Tenant Based Rental Assistance funds in conjunction with appropriate services to both keep people housed and to house the unsheltered. The NSHC is including in its action plan a line item for the creation of a small number of additional non-congregant emergency shelter beds if there is a possibility for them to be created, with an eye to the possibility that those shelter units could be converted to permanent supportive housing at a later date. The greatest focus of the NSHC is the creation of new affordable rental housing units with connected supportive services as needed for these populations.

While some permanent supportive housing has been created in our region (427 PSH units reported in the most recent housing inventory count) the need is far greater than the supply, and continues to grow. If the NSHC allocated all of its APR funding to only the development of affordable rental housing units, we might be closer to closing the existing gap in affordable supportive housing. However, due to current conditions and the need to address the number of unsheltered homeless as well as those who are unstably housed to prevent their fall into homelessness, the NSHC will dedicate a significant percentage of funds to tenant based rental assistance programs to fill the gap. Funding will be needed to provide the necessary supportive services for these populations. The thought of funding affordable rentals is moderated by the need to spread the funds across the many emergency needs of the groups that will benefit from the infusion of these funds.

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

As stated above, the difference between the number of the people who fall within the qualifying populations and the number of shelter beds and supportive affordable housing units available in our region is vast, with an enormous number of units needed to fill the gap (more than 21,000 people in our region would benefit from the creation of additional affordable housing according to the gaps analysis chart on page 5 of this document). As also stated above, the NSHC does not plan to focus on the creation of additional emergency shelter units but instead chooses to prioritize the creation of new units of affordable rental housing for qualifying populations, and

tenant based rental assistance to fill the gap for those who are unsheltered or precariously housed. Due to the current shortage of shelter beds, and because there are limited options for many people, the NSHC is including in its action plan a line item for the creation of a small number of additional non-congregate emergency shelter beds in the hope that we can find a way for some to be created. There may be the possibility that those shelter units could be converted to permanent supportive housing at a later date. In addition to the need to create additional housing units, the NSHC is aware that there exists a great need to fund supportive services to accompany those units. Providers have proven that households who receive supports when placed into housing retain their housing longer and have more positive outcomes in all categories when services are associated with housing. Services needed in our region include supports for housed households to help maintain their housing, like financial management assistance, programs to support good relationships with landlords, ongoing employment support and education options to help increase incomes, and overall case management to help direct households to the correct services to help them moving forward. Similar services need to be put in place for the general population as well, to stabilize housing situations and to increase incomes and help to provide those in need with the services required.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

(1) Those who were previously homeless but require services or housing assistance to prevent homelessness - Those in permanent supportive housing need to have the services connected to their housing continue, from food services and financial assistance to healthcare and mental health services in order to ensure stability of their housing situation. Additional services needed include legal assistance, job training/coaching, tenancy preservation training, and financial management assistance. Those placed from a shelter into housing in the community receive at least one year of stabilization services, that is, access to case management services after leaving shelter. As the number of clients served increases, so does the number of stabilization clients a provider is required to serve; typically outreach is limited and only when something catastrophic happens will assistance be called in. Many households are able to remain stable for the first year but fall into trouble later and need assistance that is no longer available. Ideally setting up permanent services that clients and others in the community can access, regardless of the date, will help to stabilize housing for those in this category.

(2) those at greatest risk of housing instability, that is,

(i) those with an annual income less than or equal to 30% of HUD AMI and is experiencing severe cost burden (paying more than 50% monthly household income toward housing costs): Those extremely low-income households with extreme housing cost burdens may fall into one of two categories. Those who rent and those who own their homes. In both cases, when incomes are extremely low and cost burdens are high, the housing becomes extremely precarious. It can take one hospitalization, one illness, a job loss or an additional child to make the household unable to afford their housing costs, and end up homeless. Those who are renters may be assisted by one of two interventions, either by placement in appropriate

affordable housing units once they are created, or by providing them with short or long term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. For those who own their own properties but fall into this category there is little that can be done aside for placement in an affordable appropriate affordable unit. Some at past public community meetings have suggested the options of setting up programs to renovate homes to allow seniors who are over-housed to take in boarders or to renovate oversized housing to create multiple units on the site to defer their housing costs. However, it has been found that zoning regulations do not allow these changes in most areas; it is worth noting that in some cases, homeowner rehabilitation may be a way to assist extremely low income homeowners to stay housed and to create additional affordable housing units.

(ii) those with an annual income less than or equal to 50% HUD AMI and one of the following:

(A) Has moved due to economic reasons two or more times during the past 60 days prior to application for homelessness assistance: Households who move from place to place two or more times within 60 days most often have been creating a negative housing history of broken leases, unpaid rent, and other hurdles that will make it more difficult to find housing going forward. These household need safe permanent affordable housing of their own and need to be taught the skills needed to build a good housing history and references to obtain housing in the future. These households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(B) Is living in the home of another because of economic hardship: Often households are forced to move in with family or friends as they are unable to support their own housing independently. In many cases people do not stay long due to the pressures of overcrowding and the associated stress, and households are forced to move again, and their lives are repeatedly turned upside down, and some, especially children, are negatively impacted and suffer because of this. These households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation.

Additional supports include tenancy preservation programs and connection with mainstream resources.

(C) Has been notified in writing that their right to occupy their current housing will be terminated within 21 days after date of application for assistance: Many people attempt to avoid unpleasant issues and do not fully grasp the severity of their situation until they actually receive a notice to quit from their landlords. At that time reality sets in and help is needed, but there is little that can be done without some extreme intervention. It is for this reason that we would include these households in our list of qualified populations because there is a great deal that can be achieved if services and intervention is implemented at this stage, before a person is traditionally homeless. Households may be assisted to retain their tenancy through housing assistance program interventions, and with legal services programs to help preserve their housing. In the event that this is not possible, households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance and housing search assistance to identify a unit. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include connection with mainstream resources and financial assistance.

(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations, or by the state, federal or local government programs for low-income individuals: Households who have lost housing may decide that they will relocate to hotels or motels until they find another housing option. In addition to being exorbitantly expensive, this solution is not feasible for the long term as these are not leased units and there is no promise of being able to remain there for an extended period. Funds always eventually run out and these households are left homeless with nothing to show for the time spent in a hotel/motel. These households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance and housing search assistance to locate a rental unit. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(E) Lives in a single room occupancy or efficiency apartment unit in which there resides more than two persons, or lives in a larger unit that resides more than 1.5 persons per room as defined by US Census: In these cases, households join forces and decide to beat the high cost of housing by doubling up and sharing a unit. When the situation is severely overcrowded, the unit does not meet state code, and it is actually unsafe, and the situation is not viable long term as people often have issues when living in cramped quarters, and one or both households may end up homeless. These households may be assisted either by placement in appropriate affordable

housing units once they are created, or by providing them with short or long term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(F) Is exiting a publicly funded institution or system of care (health care facility, mental health facility, foster care or other youth facility, or correction program or institution: Discharge from institutions is complex and even when all steps possible are taken, institutions like correctional facilities sometimes have no option but to release a person to homelessness or to unstable housing. There is no requirement that says that a person can be incarcerated longer than the originally prescribed time just because they do not have housing to go to upon release, so these systems are forced to discharge to homelessness. Those with prior criminal records are faced with additional challenges as many landlords run CORI checks and exclude those with criminal histories. The need for housing for these populations is great, and this qualified population is in need of substantial assistance. Households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the recipient's approved consolidated plan: No such housing has been identified in our region.

Identify priority needs for qualifying populations:

(1) Those who were previously homeless but require services or housing assistance to prevent homelessness- Those in permanent supportive housing need to have the services connected to their housing continue, from food services and financial assistance to healthcare and mental health services in order to ensure stability of their housing situation. Additional services needed include legal assistance, job training/coaching, tenancy preservation training, financial management assistance. Those placed from a shelter into housing in the community receive at least one year of stabilization services, that is, access to case management services after leaving shelter, but, as the number of clients served increases so does the number of stabilization clients a provider is required to serve, so typically outreach is limited and only when something catastrophic happens will assistance be called in. Many households are able to remain stable for the first year but fall into trouble later and need assistance that is no longer available. Ideally

setting up permanent services that clients and others in the community can access, regardless of the date, will help to stabilize housing for those in this category.

(2) Those at greatest risk of housing instability, that is,

(i) Those with an annual income less than or equal to 30% of HUD AMI and is experiencing severe cost burden (paying more than 50% monthly household income toward housing costs): Those extremely low-income households with extreme housing cost burdens may fall into one of two categories. Those who rent and those who own their homes. In both cases, when incomes are extremely low and cost burdens are high, the housing becomes extremely precarious. It can take one hospitalization, one illness, a job loss or an additional child to make the household unable to afford their housing costs, and then end up homeless. Those who are renters may be assisted by one of two interventions, either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. For those who own their own properties but fall into this category there is little that can be done aside for placement in an affordable appropriate affordable unit. Some at past public community meetings have suggested the options of setting up programs to renovate homes to allow seniors who are overhoused to take in boarders or to renovate oversized housing to create multiple units on the site to defer their housing costs, but it has been found that zoning regulations do not allow these changes in most areas, but it is worth noting in any event that in some rare cases, homeowner rehabilitation may be a way to assist extremely low income homeowners to stay housed and to create additional affordable housing units.

(ii) Those with an annual income less than or equal to 50% HUD AMI and one of the following:

(A) Has moved due to economic reasons two or more times during the past 60 days prior to application for homelessness assistance: Households who move from place to place two or more times within 60 days most often have been creating a negative housing history of broken leases, unpaid rent, and other hurdles that will make it more difficult to find housing going forward. These household need safe permanent affordable housing and need to be taught the skills required to build a good housing history and references to obtain housing in the future. These households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(B) Is living in the home of another because of economic hardship: Often households are forced to move in with family or friends as they are unable to support their own housing on their own. In many cases people do not stay long due to the pressures of overcrowding and the associated stress, and households are forced to move again, and their lives are repeatedly turned upside down, and some, especially children, are negatively impacted and suffer long-term emotional problems because of it. These households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(C) Has been notified in writing that their right to occupy their current housing will be terminated within 21 days after date of application for assistance: Many people attempt to avoid unpleasant issues and do not fully grasp the severity of their situation until they actually receive a notice to quit from their landlords. At that time the reality sets in and help is needed, but there is little that can be done without some extreme intervention. It is for this reason that we would include these households in our list of qualified populations because there is a great deal that can be achieved if services and intervention are implemented at this stage, before a person becomes homeless. Households may be assisted to retain their tenancy through housing assistance program interventions, and with legal services programs to help preserve their housing. In the event that this is not possible, households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance and housing search assistance to identify a unit. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include connection with mainstream resources and financial assistance.

(D) Lives in a hotel or motel and the cost is not paid for by charitable organizations, or by the state, federal or local government programs for low-income individuals: Households who have lost housing may decide that they will relocate to hotels or motels until they find another housing option. In addition to being exorbitantly expensive, this solution is not feasible for the long run as these are not leased units and there is no promise of being able to remain there long term. Funds eventually run out and these households are left homeless with nothing to show for the time spent in a hotel/motel. These households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance and housing search assistance to locate a rental unit. For those with the potential to increase their incomes, job training programs and apprenticeship programs

while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(E) Lives in a single room occupancy or efficiency apartment unit in which there resides more than two persons, or lives in a larger unit that houses more than 1.5 persons per room as defined by US Census: In these cases, households join forces and decide to beat the high cost of housing by doubling up and sharing a unit. When the situation is severely overcrowded, the unit does not meet state code, and it is actually unsafe, and the situation is not viable long term as people often have issues when living in cramped quarters, and one or the other, or both households may end up homeless. These households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(F) Is exiting a publicly funded institution or system of care (health care facility, mental health facility, foster care or other youth facility, or correction program or institution): Discharge from institutions is complex and even when all steps possible are taken, institutions like correctional facilities sometimes have no option but to release a person to homelessness or to unstable housing. There is no law that says that a person can be incarcerated longer than the originally prescribed time just because they do not have housing to go to upon release, so these systems are forced to allow them to discharge to homelessness. Those with prior criminal records are faced with additional challenges as many landlords run CORI checks and exclude those with criminal histories. The need for housing for these populations is great. Households may be assisted either by placement in appropriate affordable housing units once they are created, or by providing them with short or long term rental assistance. For those with the potential to increase their incomes, job training programs and apprenticeship programs while receiving temporary rental assistance may help to bridge the gap. For those with permanently limited income, for example a disabled person on SSDI, only long-term rental assistance, either through placement in a subsidized unit or through assistance with a permanent voucher, would be effective to stabilize their housing situation. Additional supports include tenancy preservation trainings and connection with mainstream resources.

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness as identified in the recipient's approved consolidated plan: No such housing has been identified in our region.

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

In order to delineate the level of need and gaps in the shelter and housing inventory and service delivery systems in our region, we first looked at what we know we have for inventory and services. We are fortunate that we are part of an active Continuum of Care group that cooperates and communicates well and utilizes a consolidated HMIS system and data warehouse system. We are clear about the number of shelter beds and units we have here, as well as the transitional and supportive permanent housing units in our region. Because of the close affiliation of the NSHC and the CofC, we are well acquainted with the service providers in our region as well. Many agencies work hard with very little resources to provide a number of services, but our region is still lacking services in many areas, including case management and housing search for those who are not shelter-connected but are homeless or unstably or unsafely housed. The NSHC is also a direct contact for people looking for shelter, housing, and services. Callers are directed to our offices from city staff, state agencies, and federal websites as a resource to help meet their needs. Since the NSHC is a conduit of funding, we do not own or manage any housing nor do we provide any services directly, but certainly receive many calls for assistance that can not be answered. Referrals to shelters show us that there are no empty beds, and directing people to access affordable housing lotteries or housing authorities often leads to frustration when callers call back to say the waiting lists are multiple years long. The PJ hears first hand on a daily basis how difficult it is to find an affordable rental unit, and send callers to local agencies, including the regional Community Action Programs [CAP] antipoverty agencies, who are already operating at capacity. The gaps presented in this report come from the experts in these areas, the service providers who record the number of calls for services they receive, from U.S. Census CHAS data on incomes, cost burdens, overcrowded conditions, and other housing issues, and from an annual Homeless Inventory Count [HIC] and Point in Time Count [PIC] data on units and people in them, as well as those who can be identified as living outdoors.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

The North Shore HOME Consortium will not be directly involved in the creation of new affordable units. Instead, a series of Requests from Proposals will be released when HUD approval of the plan has been granted. Proposals are expected from those who are currently engaged in the development of affordable housing, from those who are currently providing emergency shelter, from Community Action Programs [CAP agencies] and others.

Priorities will include the types of activities listed in the chart below.

If any portion of the PJ's HOME-ARP administrative funds were 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:

This section is not applicable in that no ARP funds were made available in advance of HUD's acceptance of this HOME-ARP Action Plan.

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. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,168,000		
Acquisition and Development of Non-Congregate Shelters	\$ 274,000		
Tenant Based Rental Assistance (TBRA)	\$ 1,095,000		
Development of Affordable Rental Housing	\$ 3,650,000		
Non-Profit Operating	\$ 36,791	.5 %	5%
Non-Profit Capacity Building	\$ 36,791	.5 %	5%
Administration and Planning	\$ 1,095,000	15 %	15%
Total HOME ARP Allocation	\$ 7,358,237		

Additional narrative, if applicable:

The NSHC has conducted extensive outreach to request input on the best uses of the HOME ARP allocation, including sending informative mailings, making direct phone calls to agencies, sending specific questions via e-mail, posting notices on the City website, and has held multiple community meetings (four meetings in various locations). In response a great deal of feedback has been received on how these funds should be spent. The greatest need identified, and therefore the greatest share of funding is to be allocated to, the creation of affordable rental units for the homeless and other qualifying populations. An additional priority need identified by our respondents is for Tenant Based Rental Assistance as the current housing crisis continues to create large numbers of homeless persons and the availability of shelter beds is not increasing. In general, the consensus has been to create new affordable rental housing to assist the homeless, but since there continues to a scarcity of available shelter beds, and since not everyone will be able to find a unit to use TBRA assistance, the Consortium has decided to fund the creation of new non-congregate shelter units, these units will offer supportive services to the residents. For all of the aforementioned activities, supportive services will be needed to make the programs effective. The need for social services is anticipated to support the residents in permanent housing, those receiving tenant based rental assistance, and shelter clients.

It is also acknowledged that there is a need for supportive services for those qualified populations who are unstably housed or otherwise would benefit from such services. The Consortium will use the HOME ARP administration funding to oversee these programs to allow agencies to administer certain aspects of these programs. Finally, in an effort to support and grow local nonprofit agencies, some funding is being earmarked to support operating expenses for nonprofit organizations and other funds to assist those nonprofits in their activities toward their building capacity.

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:

Regardless of how the data is analyzed, it is apparent that the housing needs in this region are substantial. The CHAS data clearly shows that significant numbers of people are unstably housed, extremely cost burdened, or living in overcrowded situations. The shelter system that is in place performs well as a place of last resort for those it is serving, but many are unable to access shelter because there are not enough beds or because some are unwilling or not allowed to enter shelter. As a result, dozens of people are living out doors or in places not meant for human habitation. People on the verge of homelessness search for resources and reach out to city, state, and federal agencies asking for help. Currently, the types of services needed are inadequate, or are not in place for many qualified populations to help them through crises. Without assistance, these families and individuals often fall into homelessness without intervention. All of these areas have been taken into consideration for this HOME-ARP Action Plan to fund eligible activities. Public response has been clearly stated about the need for the creation of a large number of affordable rental housing to address the needs of the homeless population [QP-1]. Additional emergency shelter uses (non-congregate) are needed to help to get unsheltered people indoors. Tenant-based rental assistance will be another short-term measure to help keep people housed or to house the homeless anticipating that additional affordable units will be created. Overburdened non-profit agencies are in need of operating and capacity building funds to meet their growing needs and to address the growing number of people in need of services, and are also in need of funding to provide those supportive services.

HOME-ARP Production Housing Goals

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

The NSHC estimates that it will support the development of approximately 70 new units of affordable rental housing with its ARP allocation. This calculation comes from the past experience of the NSHC considering the average per unit cost of HOME funding per unit on similar developments. The NSHC has worked with multiple other funders on developments to ensure project viability and to ensure that HOME funds are utilized as effectively as possible. Should some other funding sources not be available to help support these developments, the per

unit HOME amount would increase. The possibility of additional increases in the cost of labor and materials are expected to impact the per-unit cost of each HOME-assisted unit, and this will effect the total number of units produced.

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

As previously stated, the NSHC has set a goal of creating 70 new units of affordable rental housing for qualified populations. Since the allocation of funds is a competitive process the PJ will utilize a Request for Proposals that will allow for applications to be received on a periodic basis. It will be noted that there is a preference for serving QP-1 those who are homeless. However, it will also be noted that no one who qualifies as a member of the HUD-defined qualifying populations will be excluded. The definitions of all qualified populations will be included in that RFP. Developers will be asked to serve the homeless with a priority to serve those who are unhoused. A secondary priority will be noted to serve those who are currently without permanent housing but living in emergency shelter. The goal will be to create a variety of types and sizes of affordable rental units for those populations. Because it is anticipated that many of the residents will require some level of supportive services, additional HOME-ARP funds will be made available to cover the cost of those services. These new units – which are anticipated to be incorporated into larger scale developments for other income groups - are intended to address the stated priorities for additional affordable rental housing that are genuinely affordable to low-income and very-low income and extremely low-income households, including those who have no income. A waiting list will be maintained with direct oversight from the PJ for other qualifying populations.

Preferences

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:

- 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).
- PJs are not required to describe specific projects to which the preferences will apply.

Preferences

In response to the data shown in our regional housing gaps analysis, the North Shore HOME Consortium is establishing a preference to serve those who are homeless [QP-1]. This will included those who are unhoused and those who are living in emergency shelters in this region.

As new units are developed with HOME-ARP funds, all housing developers will be encouraged to use the Coordinated Entry System currently being utilized by the Balance of State Continuum of Care with a requirement that those who currently live in one of the Consortium's thirty member communities will be served. It is acknowledged that not every Qualifying Population is included in the regional Coordinated Entry System, and an alternative to using Coordinated Entry will be developed to accommodate these other QPs. This will include the development of a waiting list for other qualifying populations who do not fall into the QP-1category. This will be maintained t oen

sure that no qualifying population will be excluded from accessing these resources. The methods for determining prioritizations for entry in the Coordinated Entry System can be found in the Balance of State's written procedures for the Consortium's service area.

Although there is a stated preference to serve the homeless, in the overall use of HOME-ARP funds, no qualifying population will be excluded from applying. In practice this access may not always result in individuals or households from all four QP's being served with HOME-ARP funds because the resources are limited. This will include those who are survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking; some of these will also be found in QP-1.

The development of housing and services for homeless veterans and their families will also be eligible to apply for HOME-ARP funds.

Those who are at risk of homelessness [QP-2] or housing instability [QP-4] will also be eligible to apply for these funds; if programs are developed to serve these populations, applicants will be eligible for assistance on a first-come, first-served basis.

Establishing this preference for QP-1 will help to address the unmet need of those families and individuals in the region who are homeless. In addition to the goal of creating additional rental units for the homeless, it is anticipated that several local nonprofit organization will look to develop a variety of supportive services using HOME-ARP funds. Because of the long-term housing instability for many of the homeless families and individuals in the region, providing these supportive services will assist each household in maintaining stability in their housing.

Because of limited resources, there is a need to identify supportive services that are funded by other sources. The Massachusetts Department of Mental Health, the Department of Public Health and the several local agencies that have contracts with these state agencies will help in providing the long-term stability that is needed. These supportive services will include providing assistance in accessing mainstream resources, assistance in housing search activities, assistance in navigating complex systems.

Established multi-year programs that have been focused of providing short-term rental assistance to those who are unhoused will be expanded and will allow for a longer term of assistance. Currently there are three different programs that provide short-term tenant-based rental assistance, one in the Cape Ann region, one in the Merrimack Valley serving North Andover and Amesbury and another serving the greater Salem, Peabody, Beverly, Danvers region. This will be accomplished through a request for proposal process. Assistance will be provided based on the established preferences in the plan. Serving those who are at risk of homelessness will be a secondary priority.

Addressing the unmet needs of those who are not included in the preference.

No qualifying population will be excluded from accessing HOME-ARP funds. Recent outreach activities with local providers who are serving individuals who are survivors of human trafficking have been productive, with a focus on creating new units for these individuals. Further, because some of the individuals who have been trafficked now have children, there is a goal to create some family units so that they can be reunited with their children. The intention is to create new units and to provide the supportive services needed to assist in creating long-term stability for these families and individuals.

As part of the outreach and community engagement process, two local nonprofit organizations that serve survivors of domestic violence, dating violence, sexual assault and stalking were contacted.

The Jeanne Geiger Crisis Center based in Newburyport and Amesbury and Healing Abuse, Working for Change [HAWC] based in Salem and serving the greater North Shore area will be eligible to apply for HOME-ARP funds. More frequently these non-profits are not interested in owning and managing additional housing, but to place these households in safe and secure private housing using Tenant-Based Rental Assistance and supportive services to assist these families and individuals in maintaining long-term housing stability.

Serving the needs of homeless veteran and their families continues to be a goal of the North Shore HOME Consortium. The Consortium will continue to outreach to the Northeast Veterans Outreach Center and to the VA Medical Center in Bedford, Mass.

Although the level of need is great in all categories of Qualifying Populations, the NSHC will maintain a preference to serve those in QP-1 – Homeless Persons and those who are at risk of homelessness. Within that category, those who are unhoused will be prioritized over those who are indoors (for example, those in emergency shelter). This will be done with the intention that no qualifying populations will be excluded. It has been a longstanding observation that those who are survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking are found within the general population of those who are homeless. Homeless veterans and their families who fall into QP-1 will also be served as part of that preference. Following that preference, persons who are at risk of homelessness or housing instability will be given a secondary priority.

Evaluation Criteria

The North Shore HOME Consortium will invite applicants for funding to put forth the projects to create the housing and services for the populations in this first preference. Funds will be awarded to those housing developments which will serve those people who meet the preferences identified above. Strong consideration will be given to fund proposals from those who have the demonstrated capacity to complete this work promptly and effectively. Applications will be evaluated on an applicant's demonstrated development capacity, and their capacity to complete the proposed development within a reasonable timeframe. Each proposal which receives an allocation of HOME-ARP funds will demonstrate that the project can serve the Qualifying population and remain viable during the required HOME-ARP compliance period (the required period of affordability). The duration of the period of affordability will follow the parameters of the HOME Program.

When proposals are received to fund HOME-ARP assisted Tenant Based Rental Assistance, those organization that have demonstrated capacity and experience will be be prioritized over those with no experience. When funding supportive services to serve those families and individuals that fall into QP-1, those who demonstrate capacity and experience in serving the homeless will be prioritized. For proposals to fund Tenant-Based Rental Assistance and for HOME-APR supportive services, the sustainability of these uses through collaborations with other local organizations will be a consideration.

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 category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

There has been significant interest from several local providers who serve homeless families and individuals to access funding to expand supportive services to this population: QP-1. There continues to be a great demand to provide tenant-based rental assistance to those who are unhoused. Serving those who are at risk of homelessness will be a secondary priority.

It is also anticipated that these same local providers that serve the homeless will request funding to provide supportive services for the homeless. Among those types of services mentioned, providing assistance to navigate the system of housing programs to provide allowable benefits to assist in stabilizing these families and individuals. Some of these types of assistance will fall into the category of case management. All allowable uses will be considered with the goal of creating housing stability for those QP's being served

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

In addition to establishing a preference for the creation of new units of affordable housing to serve the homeless, there is a stated intention to provide the types of supportive services needed to assist in stabilizing these households and to ensure the long-term success of the developments that are funded. In addition to the outreach to those families and individuals who are currently enrolled in the Coordinated Entry System, a waiting list will also be used for those who are not on the CES list. These applicants will be served on a first-come, first served basis.

The NSHC has planned to institute a periodic application process where applicants will have an opportunity to present their proposals for funding in a four-month cycle through the first year, and possibly through the subsequent year(s).

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***

This section is not applicable in this action plan; the NSHC does not include refinancing existing debt in its plan.

- ***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.***

This section is not applicable in this action plan; the NSHC does not include refinancing existing debt in its plan.

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

This section is not applicable in this action plan; the NSHC does not include refinancing existing debt in its plan.

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

This section is not applicable in this action plan; the NSHC does not include refinancing existing debt in its plan.

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

This section is not applicable in this action plan; the NSHC does not include refinancing existing debt in its plan.

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

This section is not applicable in this action plan; the NSHC does not include refinancing existing debt in its plan.