



2023

HOME-ARP ALLOCATION PLAN



This page is intentionally left blank for double sided printing.

Table of Contents

Introduction and Acknowledgements	5
Consultation and Public Participation	6
Consultation	6
Consultation Principal Themes	7
Public Participation	11
Needs Assessment and Gaps Analysis	13
Methodology for determining the level of need and gaps in the participating jurisdiction (PJ's) shelter and housing inventory and service delivery systems	13
Data Limitations	14
Addressing Equity and Racial Disparities Among QPs.....	14
Qualifying Population 1 - Homeless.....	14
Size and Demographic Composition: Homeless	15
Unmet Housing and Service Needs: Homeless	20
Gap Analysis: Homeless	20
Qualifying Population 2 - At Risk of Homelessness.....	24
Size and Demographic Composition: At Risk of Homelessness	25
Unmet Housing and Service Needs: At Risk of Homelessness.....	27
Gap Analysis: At Risk of Homelessness	29
Qualifying Population 3 - Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking	30
Size and Demographic Composition: Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking	31
Unmet Housing and Service Needs: Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking	37
Gap Analysis: Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking	37
Qualifying Population 4 - Other Populations	38
Size and Demographic Composition: Other Populations.....	38
Unmet Housing and Service Needs: Other Populations	41
Gap Analysis: Other Populations	44
Current resources available to assist qualifying populations	45
Gaps within the current shelter and housing inventory as well as the service delivery system	46
Priority needs for qualifying populations	47

HOME-ARP Activities	48
Method for Soliciting HOME-ARP Applications	49
Rationale for the plan to fund eligible activities.....	50
Production Housing Goals	53
Affordable rental housing production goal: Achievability to addressing priority needs.....	53
Preferences	54
Method of Prioritization	54
Limitations.....	59
Statement of Commitment to Fair Housing.....	59
Appendices	59
Appendix A – Consultation.....	60
Appendix B: Community Survey Results	73
Appendix C: HOME-ARP Public Comment Responses Received 4/8/2022 – 4/29/2022.....	82
Appendix D: HOME-ARP Public Comment – Proof of Publications-Notices	89
Appendix E: HOME-ARP Public Comment Responses Received at 6/9/2022	98

Introduction and Acknowledgements

The Biden Harris Administration has provided homeless assistance systems with one-time funds to support an equitable recovery through a new program created by the American Rescue Plan (ARP) called HOME-ARP. [Click here for more information.](#)

Philadelphia will be receiving \$42,007,561 to provide long-term housing and services for those experiencing homelessness. The [CPD Notice 21-10: Requirements for the Use of Funds in the HOME-ARP Program](#) (the Notice) identifies and defines four Qualifying Populations (QPs) for HOME-ARP services. Full definitions for each QP are provided in the Notice. In summary, the four QPs to be served with HOME-ARP funding includes:

- 1) People experiencing homelessness, defined in [24 CFR 91.5](#) Homeless (1), (2), or (3);
- 2) People at risk of homelessness, defined in [24 CFR 91.5](#);
- 3) People who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking (referred to as domestic violence/sexual assault/trafficking), and
- 4) Other populations who do not qualify under any of the other three populations but meet one of the following criteria:
 1. Other families requiring services or housing assistance to prevent homelessness, or
 2. Those at greatest risk of housing instability.

Veterans, and households that include at least one veteran family member, that meet one of the definitions for QPs, are eligible to receive HOME-ARP assistance.

HOME-ARP funding can be used to provide:

- Acquisition and development of affordable rental housing;
- Tenant-Based Rental Assistance;
- Supportive Services; and/or
- Acquisition and Development of Non-Congregate Shelter.

Additionally, the funding may support HOME-ARP Administration and Planning and Nonprofit Operating and Capacity Building activities.

The City of Philadelphia is required to develop a local plan tailored to meet the unique needs of our community within the parameters set by the legislation. This plan includes:

- The consultation and public participation process completed by the OHS and DHCD;
- Needs assessment and gaps analysis, including a description of all four QPs;
- Summary of how the City intends to utilize HOME-ARP funding; and
- Established preferences for HOME-ARP funding.

The City of Philadelphia, Office of Homeless Services and Division of Housing and Community Development gratefully acknowledge the many hours of work contributed by the staff, volunteers, providers, and people experiencing homelessness to develop this plan.

Consultation and Public Participation

To ensure broad and comprehensive input in determining the best use of HOME-ARP funds, the City provided several opportunities for public comment from as many residents and stakeholders as possible. Every effort was made through the public participation process to make input accessible to people with disabilities, limited English proficiency, those without access to the Internet and/or a computer.

A summary of consultation actions is listed below.

- OHS conducted a community survey in English and Spanish that was available online, on paper or through meetings held in homeless shelters and housing programs. We received 863 responses, about 25% of which were from people with lived experience.
- OHS conducted phone survey with 40 a wide range of stakeholder organizations including veterans, youth, domestic violence, the school district, housing authority, affordable housing providers and developers. The organizations are listed in *Appendix A*. OHS conducted follow up discussions after consultation and community survey after receiving the feedback. The input from the survey and follow up interviews are listed in the *Appendices*.
- OHS developed and offered a HOME-ARP training for the Continuum of Care (CoC) Board on October 21, 2021, to educate them on the allowable uses of the funds. (In Philadelphia the CoC Board and community is called the Roadmap to Homes). It was recorded and disseminated with HOME-ARP resources to all Board members.
- In October 2021, OHS invited the Roadmap to Homes community to a HOME-ARP training. The invite was sent to over 4,000 stakeholders using the homeless services community newsletter called Tools & Training. Notice was also provided through the bi-weekly provider call.
- On November 5, 2021, OHS offered a second community-wide HOME-ARP training. Stakeholders in attendance included: CoC Board Members, homeless and domestic violence providers, veteran providers, the Philadelphia Housing Authority (PHA), youth-serving organizations, and Roadmap to Home Community Members. Additionally, other partner city agencies attended such as the Department of Behavioral Health and Intellectual Disability Services (DBHIDS), the School District of Philadelphia, the Mayor's Office for Children and Families and the Department of Human Services (DHS). The recording of the HOME-ARP training was subsequently disseminated through the list and made publicly available with additional informational resources online.

Consultation

OHS, is the Collaborative Applicant for PA-500 and administers Philadelphia's Homeless Continuum of Care (CoC).

OHS began the HOME-ARP consultation process in the Summer of 2021 soliciting feedback, ideas and concerns from various organizations to inform the HOME-ARP allocation planning process and how best to use this resource.

For a list of the organizations consulted, and summary of feedback received from these entities. *See Appendix A - Consultation*

In addition, OHS created and conducted an online community survey in both English and Spanish to get public input about potential uses for HOME-ARP funding before developing our HOME ARP plan. The background information included in the survey shared the amount of HOME-ARP funds Philadelphia will receive, detailed the HOME ARP qualifying populations, and examples of the range of activities our community could undertake.

The survey was developed and emailed in the Fall of 2021 to a list of over 4000 people on four separate occasions. People were encouraged to not only complete the surveys themselves, but to share it widely with their networks and talk through it with program participants. OHS also encouraged service providers to complete the survey and encourage participants to complete the survey. The survey was also available by calling OHS to complete it, plus translation services were offered to make it accessible to people with limited English proficiency. The survey was open for 4 weeks. An impressive 863 people responded to the survey.

Notably, 27% of those who responded to the survey had lived experience of homelessness. There was broad based representation across the City's zip codes and ages. More women (67%) than men (23%) responded to the survey. 9.5% of those who offered ethnic identity reported being Hispanic/Latin(o)(a)(x) and 3% reported being gender nonbinary or transgender. 41% of respondents who answered reported identifying themselves as Black or African American. Focus groups asking the survey questions were also conducted with our CoC board, the Lived Experience, Service Provider and Racial Equity Committees.

The results of this survey, the focus groups, and the extensive consultation process coupled with the housing and homelessness needs and gaps data provided clear direction for the proposed investment of HOME-ARP funding to alleviate homelessness in Philadelphia.

The top priority activity identified through the survey was overwhelmingly the acquisition, rehabilitation and development of affordable housing. Respondents expressed a particular interest in repurposing blighted, abandoned and vacant buildings including sacred spaces and schools. Supportive services and tenant based rental assistance were nearly matched as second and third priority activities with the acquisition, rehabilitation and development of non-congregate shelter coming in fourth.

Consultation Principal Themes

Increased affordable housing was consistently elevated as the highest priority for HOME-ARP funding. Though tenant-based rental assistance has been a valuable resource throughout Philadelphia, most providers and stakeholders stressed the challenges of identifying vacant units, particularly units affordable to those who are a part of the qualifying populations and units in high-opportunity areas in proximity to employment and other needed services and amenities. Community feedback demonstrated a wide variance in shelter capacity from neighborhood to neighborhood, highlighting a gap in shelter, particularly for those with behavioral health needs.

Additionally, some providers and stakeholders have reported long shelter stays due to limited housing resources which also limits shelter capacity over time. (See Table 1).

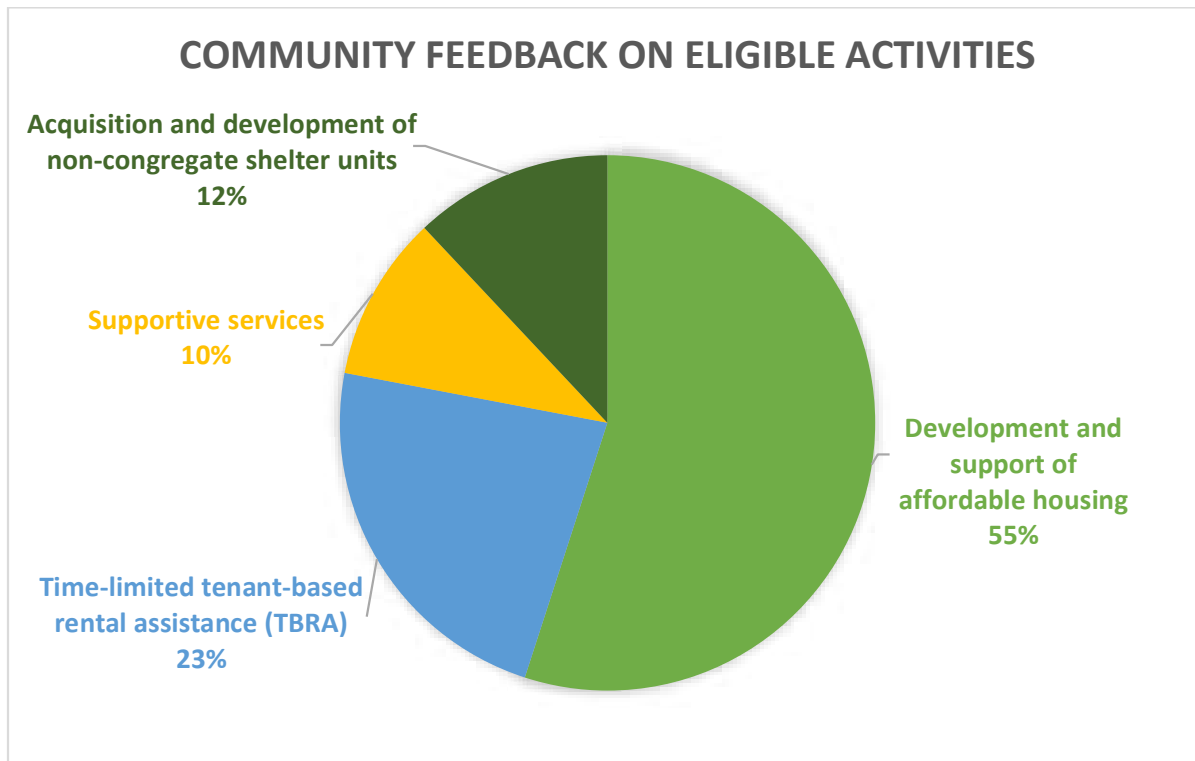


Table 1

Further feedback from the community indicated that people experiencing homelessness ranked as the highest priority population among HOME-ARP qualifying populations, though there was consistent feedback for a significant and increasing need amongst all four qualifying populations. (See Table 2)

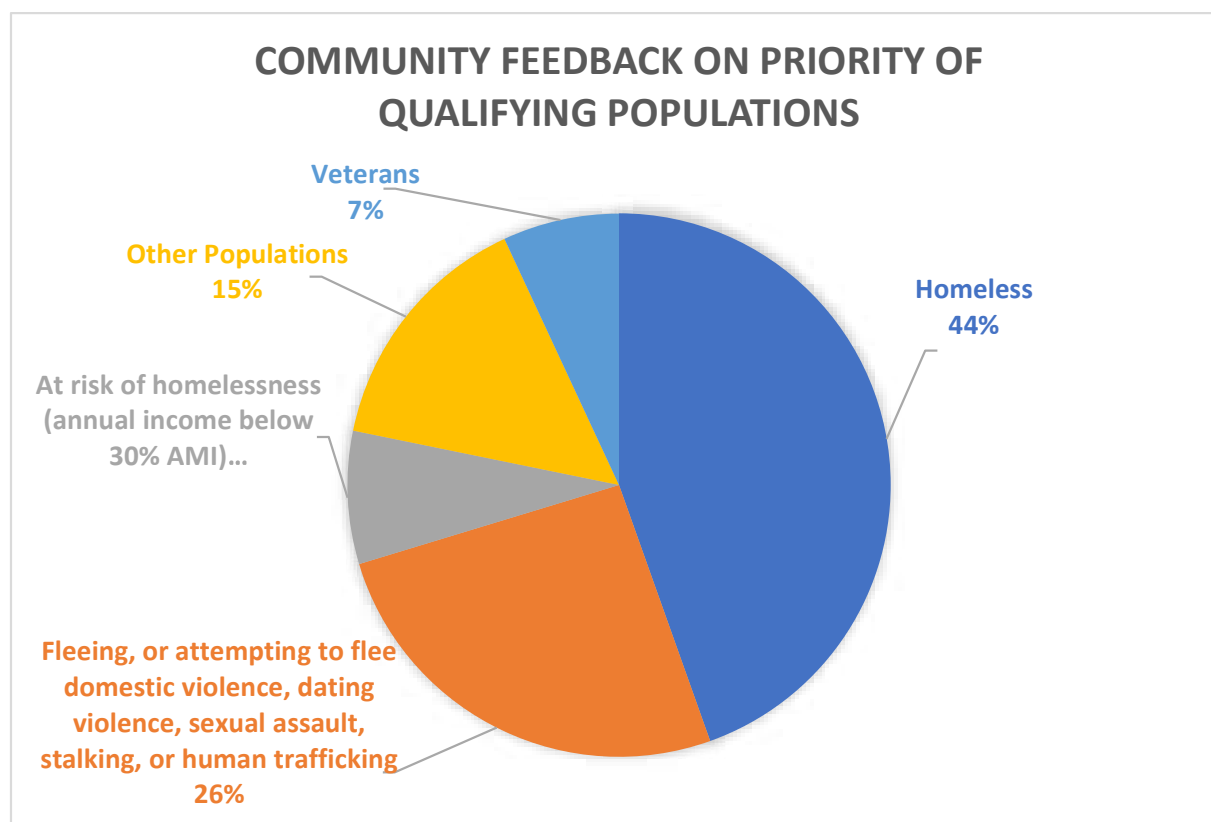


Table 2

The community survey results ranked the HOME ARP qualifying populations in the following order:

- People experiencing homelessness, defined in [24 CFR 91.5](#) Homeless (1), (2), or (3);
- People at risk of homelessness, defined in [24 CFR 91.5](#) CFR 91.5;
- People who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking (referred to as domestic violence/sexual assault/trafficking), and
- Other populations who do not qualify under any of the other three populations but meet one of the following criteria:
 1. Other families requiring services or housing assistance to prevent homelessness, or
 2. Those at greatest risk of housing instability. Veterans, and households that include at least one veteran family member, that meet one of the definitions for QPs, are eligible to receive HOME-ARP assistance.

Philadelphia achieved a virtual end to veteran homelessness in 2015, which the City has largely sustained, so this ranking was not surprising. It was also not a surprise that the at-risk of homelessness was not prioritized for HOME-ARP. Through our Emergency Rental Assistance Program (ERAP) we were able to prevent people from losing their housing and help them remain stably housed during the pandemic.

Philadelphia has been hailed as a national model, both for the speed with which it has sent the money out and the way the assistance program is integrated with the municipal court system. The

City disbursed over \$145 million dollars in rental assistance and the U. S. Treasury awarded Philadelphia another \$100 million in funding recognizing it as a high performing jurisdiction. In addition, our eviction prevention programs provide legal representation, mediation services and financial assistance so that people can remain stably housed. We also provided emergency rental subsidies to residents that experienced pre-pandemic housing issues to help them maintain their housing.

Based on the HOME-ARP community survey, stakeholder feedback revealed the need for case management and other supportive services to ensure housing stability. This support applied to all populations: people with mental health and substance use disabilities as well as young adults, families, immigrants, refugees, and older adults.

Stakeholders mentioned that services should be dynamic, direct, and trauma informed. Several stakeholders mentioned the importance of locating landlords, landlord tenant marketing, housing search and counseling, housing navigators, plus expanding the pool of affordable housing, while upholding fair housing and eliminating discrimination and segregation. Life skills, employment, budgeting, financial stability assistance and housing counseling supports are important, both for people experiencing homelessness and those experiencing housing instability. Survey respondents also prioritized services such as childcare and family supports followed closely by workforce development for those in for those in emergency shelters. Financial counseling was another priority among those listed.

There was broad support for establishing a preference for people experiencing homelessness who have disabilities and/or special needs to get time-limited, tenant based rental assistance. There was also great interest in making time-limited rental assistance available to people who are not homeless but have extremely low incomes and are housing insecure. The final preference will be noted.

Suggestions offered through the online survey are included as *Appendix B*.

Public Participation

OHS, which administers the City's homeless Continuum of Care, together with DHCD, has drafted this plan using extensive community input, consultation with a range of organizations, need and gaps data from both the homeless assistance system and the local housing market to identify priority activities, priority qualifying populations and the planned allocation of HOME-ARP resources. Several opportunities to provide public comment were provided to solicit feedback from as many residents and stakeholders as possible.

Dates of the public comment period and public hearing(s):

Notice Date	Comment Period	Public Hearing/Meeting Date
1. April 8, 2022	April 8, 2022 – April 29, 2022	April 20, 2022
2. May 26, 2022	May 26, 2022 – June 9, 2022	June 9, 2022
3. July 11, 2022	July 11, 2022 – August 11, 2022	Open Public Comment Only

First Public Comment Opportunity: April 8, 2022 – April 29, 2022

First Public Meeting/Hearing - April 20, 2022

On April 8, 2022, OHS informed the community that the HOME-ARP ALLOCATION PLAN was posted on the OHS website plan would be and the opportunity for public comment period would be open from April 8, 2022, through April 29, 2022. OHS also notified the community, residents, and stakeholders of the public meeting to be held Wednesday, April 20, 2022, at 2:00 PM.

An English and Spanish version of the Plan was posted on the ADA complaint website on Friday April 8th and the public was encouraged to review the plan, budget, and proposed activities, and submit public comments. OHS notified the public through its Tools and Training Newsletter which reaches 4000 stakeholders including our immigrant, Latinx, and refugee service providers, social media and weekly provider calls. Comments could be submitted via email, call-ins, or drop-off at the OHS offices. Translation services were offered during the public comment period and providers serving participants with disabilities were informed about the availability of the plan and the April 20th public meeting and public comment process (See Appendix D for proof of notice). These providers then promoted this information to their network of participants.

On April 20, 2022, OHS held a virtual public meeting that was also translated into Spanish. This meeting included a translator and OHS staff gave an overview of the HOME-ARP criteria and potential projects/activities to be funding with HOME-ARP funding.

OHS reviewed all comments and views of residents received in writing and orally. OHS also considered all comments and views expressed during the April 20th public hearing and 21-day public comment period when preparing the HOME-ARP allocation plan. A summary of the public comments with rationale which comments were and were not accepted can be found in Appendix C.

Second Public Comment Opportunity: May 26, 2022 – June 9, 2022

Second Public Hearing: June 9, 2022

The public was notified of a City Council hearing as another opportunity to provide comment. The ordinance and the updated HOME-ARP Allocation plan were introduced at the May 26, 2022, City Council hearing which is televised on Chanel 64 in Xfinity and Chanel 40 in Fios. City Council placed an advertisement on June 3, 2022, notifying the public of the public hearing on June 9, 2022, at 10 am via zoom inviting testimony on the HOME-ARP (see Appendix D for Notice). The City Council Hearing had an ESL interpreter, and all City Council staff phone lines have telephonic translation services available to service LEP residents. City Council voted on the final recommendations and passed Bill No. 220508 for an approved Substantial Amendment to the 2021-2022 Annual Action Plan on June 23, 2022, to include the HOME-ARP allocation plan. See Appendix D for a summary of the comments received during testimony.

Third Public Comment Opportunity: July 11, 2022 – August 11, 2022

Finally, an advertisement was published in the local newspaper and published on DHCD's website on July 11, 2022, alerting the public of a final opportunity to comment. The plan was available in both English and Spanish (See Appendix D). This comment period closed on August 11, 2022. No comments were received.

In addition to the steps taken to broaden public participation described above, OHS uses social media, specifically Twitter, to broaden participation. Particular target outreach was done for the Latinx/Hispanic and other LEP communities. OHS disseminated a biweekly informational email newsletter to over 4000 people which has been used to keep the community informed about HOME-ARP program. OHS also hosts weekly Homeless Service Provider Call that routinely attract over 100 organizational representatives. During weekly homeless provider calls, public participation, training, community meetings are training are and have been promoted. Our providers serving participants with disabilities were informed about the plan and public comment process. OHS asked these homeless and social service providers (such as Liberty Resources, Inc., etc.) to share these resources and input opportunities with their networks including staff, volunteers, and participants. As noted earlier, OHS disseminated a community survey to solicit ideas from the community and encourage interest in HOME-ARP in English and Spanish. In addition, targeted outreach was specifically done with refugee, immigrant and Hispanic organizations to encourage participation in community meetings, discuss project ideas, gaps and needs in the community and opportunities for innovation.

The summary of comments/recommendations received through the public participation process can be found in Appendices C and D.

Needs Assessment and Gaps Analysis

Methodology for determining the level of need and gaps in the participating jurisdiction (PJ's) shelter and housing inventory and service delivery systems

The City used the following data sources to determine the size and demographic composition of qualifying populations in Philadelphia, their needs, and gaps within the current service delivery system:

- Housing Inventory Count (HIC), 2022 reports for the Philadelphia CoC
- Point in Time (PIT) Count, 2022 reports for the Philadelphia CoC
- Longitudinal Systems Analysis (LSA), FY2022 reports for the Philadelphia CoC
- American Community Survey (ACS) 1-Year Estimates Data Profiles, Table DP04 Selected Housing Characteristics
- Comprehensive Housing Affordability Strategy (CHAS), 2014-2018 for Pennsylvania
- Philadelphia CoC Race Equity Assessment Report
- PEW Trust.org
- Data Dashboard for the Emergency Rental Assistance Program (ERAP), <https://www.dhs.pa.gov/ERAP/Pages/ERAP-Dashboard.aspx>
- Philadelphia Homeless Management Information System
- 2021 Data Snapshot
- 2022 Data Snapshot
- Domestic Violence Counts Report, 16th annual report for Pennsylvania
- National Human Trafficking Hotline, 2020 Statistics for Pennsylvania
- Philadelphia Gaps Analysis
- HOME-ARP Consultation Meetings and Stakeholder Survey

Based on the 2022 calendar year PIT and HIC shown in Table 9, Philadelphia has 4,930 total beds in sheltered units (emergency, transitional and safe haven). The annual turnover percentage of permanent housing units is less than 2%. This provides the rationale for an increase of 3,315 permanent housing units needed.

To determine the potential allocation of projects utilizing HOME-ARP funds, we looked at our needs and gaps from the homeless housing system collected through our Homeless Management Information System (HMIS) called Client Track. The data shows how vulnerable and marginalized populations are being served, combined with the need for more deeply affordable housing and supportive services to address the continued barriers people experiencing homelessness face.

The current estimated need as of March 2, 2022, within Philadelphia's homeless services system is 475 affordable units for households with children and 3,402 affordable units for households without children. Philadelphia's focus will be to increase the number of units to connect the most vulnerable populations to stable housing, including units that may be suitable for families and

single adults (age 18+). Ideally, 25% of these units will be ADA compliant with a minimum of 10% accessible to those with physical disabilities.

Data Limitations

When available, 5-year tables for ACS and CHAS data were selected. According to the US Census Bureau, “the 5-year estimates from the ACS are “period” estimates that represent data collected over periods of time. The primary advantage of using multiyear estimates is the increased statistical reliability of the data for less populated areas and small population subgroups.” Current ACS and CHAS data are not reported at the level of HOME-participating jurisdictions, but since Philadelphia accounts for a larger percentage based on population density, statewide reports were used. Generally, while date ranges for each report are not identical, they provided a useful framework for understanding the data and were utilized. The framework informed the understanding of the size of qualifying populations which informed the identification of preferences for HOME-ARP services among qualifying populations.

Addressing Equity and Racial Disparities Among QPs

HMIS Data from the Philadelphia Continuums of Care (CoC) reflect higher rates of homelessness among Black/African American households than any other race, and Hispanic households have the highest rate of poverty at 30% according to PEW Trust.org. Consultation meeting and HOME-ARP survey participants highlighted many factors contributing to this reality as well as opportunities to address these disparities. Many called for the need for education and awareness about the impacts of historical and institutional racism and the reality of inequities that persist today.

Qualifying Population 1 - Homeless

During the Fiscal Year (FY) 2021, the Philadelphia CoC along with the rest of the world, was hit with the global pandemic known as the Coronavirus (COVID-19) which had a direct impact on the unsheltered and sheltered homeless throughout the City. People experiencing homelessness faced greater risk of harm due to higher rates of morbidity and mortality resulting from pre-existing health conditions from exposure to the elements. Through the collaborative efforts of our providers, we have helped reduce the destructive impacts of the pandemic by placing our most vulnerable in COVID Prevention Spaces or Quarantine and Isolation sites, affordable housing, and non-congregate shelter while investing in long term housing strategies with the public and private sectors and providing financial assistance to those at risk of homelessness. The process of resolving unsheltered homelessness is much more complicated and takes longer than that for people in crisis shelter.

Philadelphia has seen success during these times of crisis in reducing the number of people experiencing homelessness by shifting priorities to the most vulnerable to COVID. Affordable housing paired with supportive services is a solution to homelessness. The community and landlord surveys, consultation and input process affirmed the priority focus on expanding access to independent supportive housing.

The Philadelphia CoC has determined that connecting people experiencing homelessness with long-term housing, while improving access to supportive services are necessary to keep participants housed and engaged. This is done through a person-centered approach that allows the participants to obtain and remain in independent stable housing for future generations.

Size and Demographic Composition: Homeless

Philadelphia's Coordinated Entry and Assessment-Based System operates access points throughout the Philadelphia jurisdiction, conducting assessment and referral for the Philadelphia CoC, as well as information and referral for individuals seeking housing assistance and other relevant services. In the annual data snapshot report for 2022, Access point data from HMIS reported 35,642 contacts through Coordinated Entry. Of these, the largest need identified was emergency shelter for participants experiencing homelessness (68%). These participants fall under Qualifying Population 1 – Homeless. The remainder were participants at-risk of homelessness seeking prevention support (17%), shelters for domestic violence survivors (10%), and participants seeking assistance with affordable housing (5%). Participants experiencing a housing crisis may express multiple needs, so these percentages are not mutually exclusive.

Additionally, data from the PIT, and LSA, and 2022 HIC were utilized to determine the size and demographics of the population of people experiencing homelessness within the Philadelphia participating jurisdiction, as well as the unmet needs of this population and gaps within the homeless response and housing systems. In the 2022 PIT count the data identified 4,489 people experiencing homelessness on the night of the count. The details of the size and demographic composition of QP 1 (Homeless) is summarized by our HMIS data below.

Current State of Qualifying Population #1 - Homeless	
Number of Households with Children (as of 12/16/22)	Current Number of Households without Children (as of 12/16/22)
875	5,929

Source: HMIS

Table 3

Point-in-Time Count

The PIT provides a “snapshot” of homelessness in a community. The 2022 PIT Count for the Philadelphia CoC identified 4,489 people experiencing homelessness across the entitlement jurisdiction on the night of the count, including:

- 3,701 individuals sleeping in a sheltered location (emergency shelter, safe haven, or transitional housing) and
- 788 individuals sleeping in a place not meant for habitation.
- Homelessness in the jurisdiction skewed toward adult-only households (72%), with persons in households with adults and children comprising 28% and persons in child only households accounting for less than 1% of the PIT Count.
- Adults in adult-only households were far more likely to be sleeping in an unsheltered location (99%) than persons in households with children (1%).

2022 PIT Count Data (Includes Sheltered & Unsheltered)	
Year	2022
Point in Time Date	2/23/2022
Summary by Household Type reported	
Households without children	3,208
Households with at least one adult and one child	426
Households with only children	1
Total Homeless Households	
3,635	
Summary of persons in each household type	
<i>Persons in households without children</i>	
3,219	
Persons Age 18 to 24	231
Persons Over Age 24	2,988
<i>Persons in households with at least one adult and one child</i>	
1,269	
Children Under Age 18	783
Persons Age 18 to 24	135
Persons Over Age 24	351
<i>Persons in households with only children</i>	
1	
Total Homeless Persons	
4,489	

Source: Point in Time (PIT) Count, 2022 reports for the Philadelphia CoC

Table 4

Subpopulations

On the night of the 2022 PIT Count, 1,559 people self-identified as having a severe mental illness and 1,317 people self-identified as having substance use disorder (SUD). The percentage of individuals who were unsheltered and identified with severe mental illness (35%) or SUD (29%) is comparable to the overall percentage of the PIT Count experiencing

unsheltered homelessness, suggesting that these factors are not predictive of unsheltered homelessness and do not present an additional barrier to shelter entry. Veterans accounted for 157 people experiencing homelessness, and 277 people identified as survivors of domestic violence. 79% of these subpopulations were sleeping in a sheltered location (emergency shelter, safe haven, or transitional housing) on the night of the PIT Count.

Subpopulations Counted during the 2022 PIT Count			
	Sheltered	Unsheltered	Total
Serious Mental Illness	1,185	374	1,559
Substance Use Disorder	1,089	228	1,317
HIV/AIDS	97	16	113
Survivors of Domestic Violence	201	76	277

Source: Point in Time (PIT) Count, 2022 reports for the Philadelphia CoC

Table 5

Race

Nearly 73% of people experiencing homelessness on the night of the 2022 PIT Count were Black or African American (3,254 individuals), over 21% were White (965 individuals), and almost 4% identified multiple races (189 individuals). Individuals identifying as either American Indian or Alaska Native (18), Asian (33), and Native Hawaiian or Other Pacific Islander (30) accounted for less than 1% of the total PIT Count.

2022 PIT Count by Race			
	Sheltered	Unsheltered	Total
American Indian, Alaska Native or Indigenous	9	9	18
Asian or Asian American	23	10	33
Black or African American or African	2753	501	3254
Native Hawaiian or Pacific Islander	30	0	30
White	734	231	965
Multiple Races	152	37	189
Hispanic/Latin(a)(o)(x)	404	139	543
Totals	4105	927	5032

Source: Point in Time (PIT) Count, 2022 reports for the Philadelphia CoC

Table 6

Longitudinal Systems Analysis

Annualized data about homelessness is available in a community's HMIS, which informs systemwide reports such as the Longitudinal Systems Analysis (LSA).

The LSA defines homelessness as all individuals in HMIS-participating projects who spent at least one day in emergency shelter, safe haven, or transitional housing, as well individuals in programs that provide tenant-based rental assistance who spent at least one day in those projects prior to move-in to housing. (The latter brings residents experiencing unsheltered homelessness into the count, insofar as those later served in housing. Because the LSA does not include Coordinated Entry or Street Outreach data, this is an undercount of unsheltered homelessness in a community.)

In FY2022 LSA, there were 11,119 households made up of 13,533 total people experiencing homelessness.

Household Composition

According to the 2022 LSA data, the majority of Philadelphians experiencing homelessness are households without children (9,694 households) compared to households with children (1,282 households). 213 households did not specify. See Table 7 below.

Household Composition



Source: Longitudinal Systems Analysis (LSA), FY2022 reports for the Philadelphia CoC
Table 7

Race

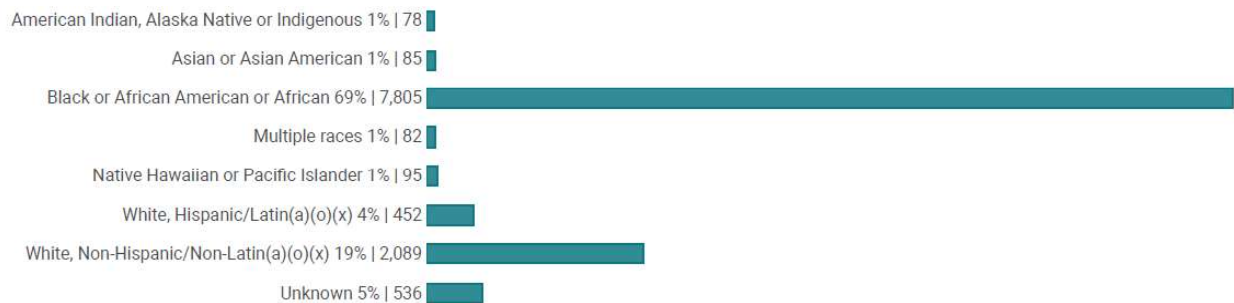
For the past three decades, studies have shown that African Americans are overrepresented in the U.S. homeless population.¹ Reviewing the cumulated results from the FY2022 Point-in-

¹ Homelessness and Racial Disparities (2020). <https://www.census.gov/library/stories/2020/09/poverty-rates-for-blacks-and-hispanics-reached-historic-lows-in-2019.html>

Time count shows that nationally, four in ten people experiencing homelessness were African American, whereas in the general population, African American people represent one in ten.² This trend is also evident in Philadelphia, where African Americans represent 78% of the persons served in housing crisis and assistance programs in FY21, but only 42% of the city's general population.³

The LSA provides race and ethnicity data for all heads of households and adults which are found in the Race and Ethnicity of HoH and Adults (excluding children in households for which children are not the head of household) in Table 8.

Race and Ethnicity of HoH and Adults



Source: Longitudinal Systems Analysis (LSA), FY2022 reports for the Philadelphia CoC Table 8

According to the PEW Philadelphia 2022⁴, the ethnic composition of the City of Philadelphia was 14.5% (228,451) Hispanic or Latino and 85% (1,347,071) Non-Hispanic or Non-Latino.⁵ In addition, 20% of the Hispanics are Foreign born, where 25% are not citizens which presents additional challenges to connecting those experiencing homelessness to the appropriate housing and service resources.

Like African Americans being overrepresented within the homeless population, the share of the U.S. population identifying as Hispanic/Latinx (18% of U.S. population), are also overrepresented within the homeless population, representing twenty-three percent of persons experiencing homelessness. In Philadelphia, according to the 2022 OHS Data Snapshot⁶,

² U.S. Department of Housing and Urban Development (2020). The 2020 Annual Homeless Assessment Report (AHAR) to Congress. 12.

³ U.S. Census Bureau (2019 population estimated); U.S. Census Bureau, American Community Survey 5-Year Estimates

⁴ PEW Philadelphia: State of the City. Retrieved from: <https://www.pewtrusts.org/en/research-and-analysis/reports/2022/04/philadelphia-2022-state-of-the-city>

⁵ U.S. Census American Community Survey (ACS) 2020 1-year estimates. ACS Demographic and Housing Estimates. Retrieved from: <https://data.census.gov/cedsci/table?q=Philadelphia%20city,%20Philadelphia%20County,%20Pennsylvania&g=040000US42&tid=ACSST5Y2018.S0501>

⁶ 2022 Data Snapshot. Retrieved from: <https://www.phila.gov/departments/office-of-homeless-services/documents/publications/#/?table=Data%2520snapshots&q=Office%20of%20Homeless%20Services%20Data%20Snapshot%202022>

eighteen percent of the general population identified as Hispanic/Latinx, but in the housing assistance programs, this group represented nine percent of the population served. Moreover, people who are Latinx/Hispanic are also less likely to use standard homeless sleeping arrangements and more likely to be in crowded, inadequate housing or “doubling up.” This may consequentially, exclude them from accessing homeless assistance programs, which focus on serving persons who are homeless according to the definition provided by HUD.

Adding to this complexity, Pew Philadelphia 2022 also cites 23% of Philadelphians are living in poverty, of which 11% are in deep poverty made up of women and children. Hispanics have the highest poverty rate 32.5% followed by Blacks 28.3%, and 21.9% Asian.

Unmet Housing and Service Needs: Homeless

Philadelphia strives to empower homeless families with solutions to achieve housing stability and long-term self-sufficiency. We understand that everyone’s needs and situations are unique. That is why we strive to develop responsive and innovative programming that is built to fit the needs of each household through City investments and leveraging resources to address homelessness. According to HMIS data, there is a need for collaboration between OHS, the Department of Behavioral Health and Intellectual Disabilities, and the CoC Service Providers to investigate and address local-level geographic gaps and challenges, and other access barriers, that are preventing unsheltered individuals and families from securing shelter to mitigate their immediate homeless crisis needs. We also identify critical gaps in services and supports; long-term and affordable housing options; mental health services; education and career development support; and aftercare services and supports.

Based on the 2022 PIT count and Housing Inventory Count, Philadelphia has 4,930 total beds in sheltered units (Emergency, Transitional and Safe Haven) with a current annual turnover percentage of permanent housing units being less than 2%. Thus, the current estimated need within the Philadelphia homeless services system is 474 units for households with children and 2,841 units for households without children. This provides the rationale for an increase of 3,315 permanent housing units needed. (See Tables 9 and 10)

2022 Homeless Households									
		Current Inventory				Homeless Population			
		Households with Children		Households without Children		Households with Children		Households without Children	
Year	Project Types(s)	Households with Children Beds	Households with Children Units	Households without Children Beds	Households without Children Units	Households with Children (# of persons)	Households with Children	Households without Children (# of persons)	Households without Children
2022	Permanent Supportive Housing (PSH)	2021	586	3265	3265				
2022	Rapid Rehousing (RRH)	1099	348	413	413				
2022	Other Permanent Housing (OPH)	0	0	10	10				
2022	Emergency Shelter (ES)	1284	419	2375		3413	1315	10156	10111
2022	Safe Haven (SH)			245		2	2	527	503
2022	Transitional Housing (TH)	611	208	415	415	562	239	446	446

Source: Housing Inventory Count (HIC), 2022 report for the Philadelphia CoC
Table 9

Gap Analysis: Homeless

Participant vulnerabilities and structural-level factors intertwine and produce different pathways into and out of homelessness. Although structural factors, such as lack of affordable housing, income inequality and unemployment, cause homelessness; individual vulnerabilities, such as mental and physical health issues, low income, lack of education, and veteran status, influence who experiences homelessness.

Participants also differ in their use and continued need of services depending on the reasons they identified as contributing to their homelessness, especially those who are chronically homeless. Despite service provider efforts to meet housing and healthcare needs of people experiencing homelessness, multiple service gaps exist. Commonly identified service gaps include food insecurity, behavioral health and medical needs. For example, in our HOME ARP community consultation showed that, healthcare and mental health services often fail to meet the needs of individuals experiencing homelessness, resulting in high emergency room usage for non-emergency issues. Additionally, service gaps exist for certain marginalized groups such as LGBTQ youth and people with disabilities,

Gaps between service needs and availability often prevent individuals with a history of homelessness from accessing services and reestablishing permanent housing.

Participants with different pathways into homelessness may also experience meaningful differences in service use, needs, and barriers to services. Unfortunately, little research has examined how these service use patterns, needs, and barriers differ among individuals based on their pathways into homelessness. We are conducting research to learn how people who are unsheltered learn about services, access services and how likely they will use services that are in convenient locations that fulfill their needs and where they are treated with respect. These findings will have implications for improving coordination and the development and dissemination of services aimed at assisting those experiencing homelessness. In addition to helping ensure equity in the types of interventions offered to different groups experiencing homelessness, and the efficacy of our homeless response when assisting people in resolving their homeless crises.

The gaps analysis in Table 10 considers the current availability of project beds for households with children and Households without children experiencing homelessness in Philadelphia.

2022 Gap Summary of Beds and Units				
	Gaps Analysis			
	Households with Children		Households without Children	
	# of Beds	# of Units	# of Beds	# of Units
Chronic Homeless	63	19	870	870
Non-Chronic Homeless	1368	455	1998	1971
Total	1431	474	2868	2841
Total Beds	4299			
Total Units	3315			

Source: 2022 Housing Inventory Count (HIC)

Table 10

Housing

Emergency shelter provides safety to households during their immediate homeless crises, while long-term housing stability is available via housing projects such as rapid rehousing (RRH), Supportive Housing (SH also known as PSH), and other housing interventions. Housing gaps analyses compare a homeless response system's inflow, as measured through Coordinated Entry assessment processes, to the availability of housing within the system. Housing gaps analyses for the Philadelphia CoC are conducted annually by the Office of Homeless Services, most recently in September 2022. The report indicates the need for significant expansion of SH throughout the CoC. The RRH and SH demand vs supply is shown below in Table 11:

Capacity Demand for QP1 – Permanent Housing						
	Households in need of RRH	RRH Units	RRH capacity to meet demand	Households in need of SH	SH Unit	SH capacity to meet demand
Philadelphia	870	1378	63%	360	4353	8%

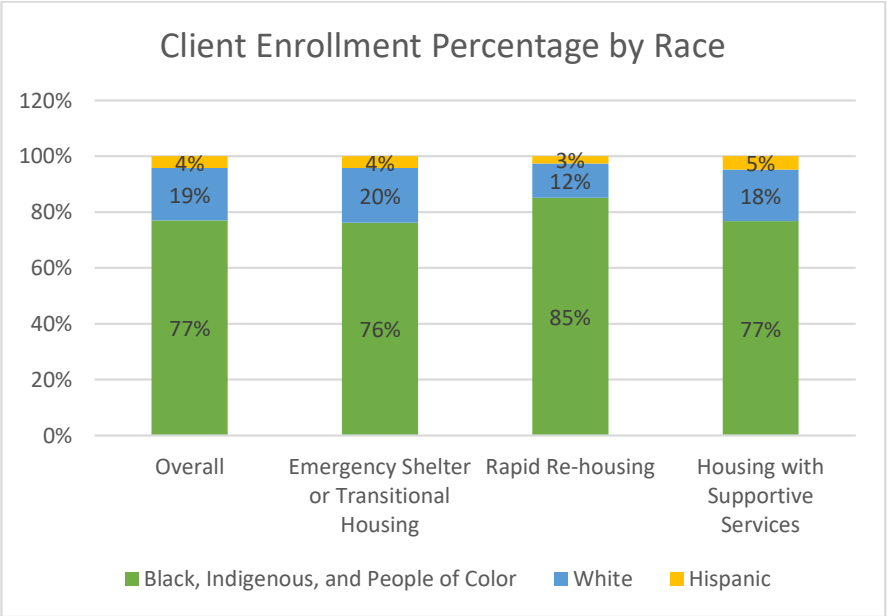
Source: HMIS

Table 11

In addition to inventory gaps, LSA data helps identify racial or ethnic disparities among enrollments in HMIS-participating homeless projects. This can illuminate barriers in Coordinated Entry or other processes in the allocation of system interventions among groups. In Philadelphia, the racial disparities noted above in PIT data are also found in the LSA data, with 77% of the people experiencing homelessness reported in HMIS identifying as Black, while persons identifying as Black make up only about 40% of the general population based on the 2020 Census. White, non-Hispanic/Latinx residents account for 19% of the total population of people participating in homeless system interventions and 18% of SH. Residents who are Black, Indigenous, or other people of color account for 77%

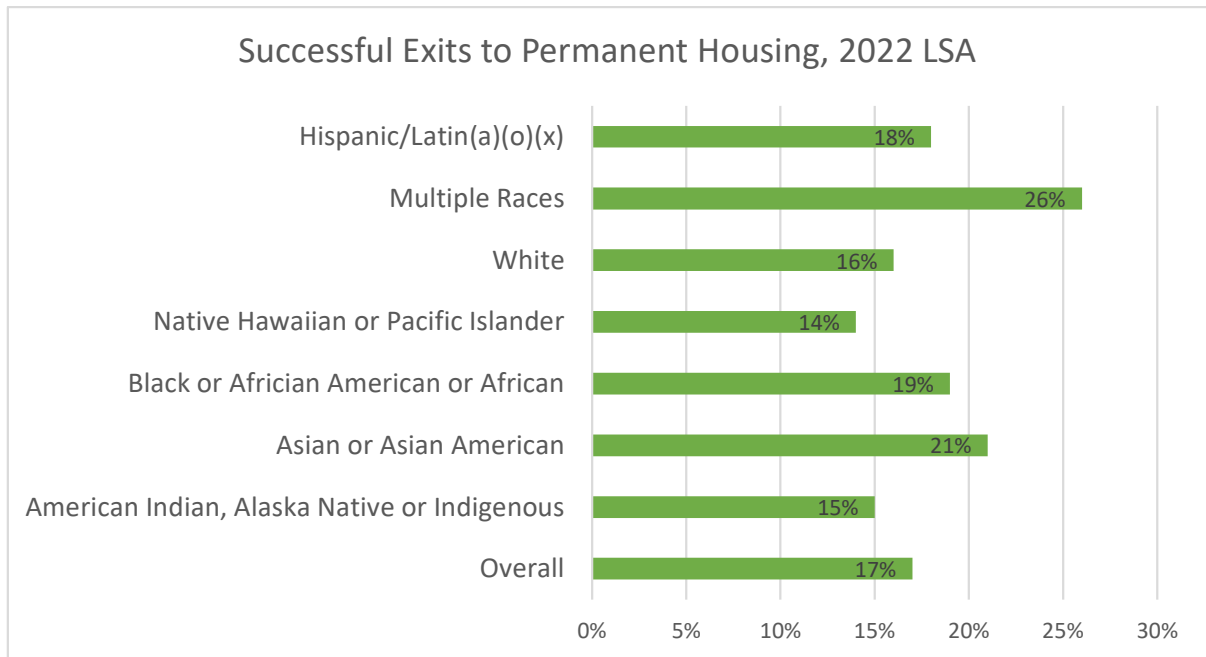
of the total population of people participating in homeless system interventions but are overrepresented in homeless projects (76% of ES and TH) and also overrepresented in housing projects (85% of RRH and 77% of PSH). Racial and ethnic disparities are smaller, with each project type falling within 2 percentage points of the overall distribution, except RRH where the percentage gap is almost a 10% difference. These data points to racial inequities within the distribution of system interventions, that lead to white residents’ overrepresentation in housing projects and Black, Indigenous, People of Color (BIPOC) residents’ overrepresentation in homeless projects. This data is reinforced in the input from both Consultation Meetings and the HOME-ARP Community Survey which names discrimination and the displacement of BIPOC households as leading to the underrepresentation of BIPOC residents in housing projects.

The following graph reflects these racial inequities, comparing the overall demographic differences in all LSA-reporting projects to demographic differences within each project type. (The LSA combines emergency shelter, safe haven, and transitional housing into a single category.)



Source: Longitudinal Systems Analysis (LSA), FY2022 reports for the Philadelphia CoC
Table 12

Additionally, the LSA is useful in understanding the effectiveness of a CoC’s homeless system in assisting groups in resolving their homeless crises by exiting the system to permanent housing destinations. In Philadelphia, 17% of system exits were to permanent housing destinations. The highest exit percentages were found in multiple races (26%) and Asian or Asian American (21%) populations, with all other groups below 20%.



Source: Longitudinal Systems Analysis (LSA), FY2022 reports for the Philadelphia CoC
Table 13

Currently the Philadelphia Housing Authority (PHA) together with OHS operate the Emergency Housing Voucher (EHV) Program. The Community prioritized 35% of the EHV allocation toward people who are homeless. As of 3/10/22, 58 voucher holders were leased up and 209 are actively searching for housing out of the 302 total EHVs issued to date. To help increase the continued need for and education around affordable housing efforts, OHS has established a landlord database called Padmission and landlord network made up of stakeholders to help educate landlords and tenants about supportive housing resources.

Although the Philadelphia CoC has increased its permanent housing supply, there is still a significant need for affordable housing both with and without supportive services. The current estimated need within the current homeless services system is 474 units for households with children and 2,841 units for households without children aged 18 and over.

Qualifying Population 2 - At Risk of Homelessness

Homelessness prevention services prevent participants from moving into an emergency shelter or living in a public or private place not meant for human habitation. Services and assistance range from short-term and medium-term tenant-based or project-based rental assistance, rental arrears, rental application fees, security deposits, advance payment of last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, mediation, legal services, and credit repair. 23% of Philadelphians are living in poverty, of which 11% are in deep poverty primarily made up of women and children. People who identify as

Hispanic or Latino/a/x have the highest poverty rate 32.5% followed by people who identify as Black or African American 28.3%, and 21.9% Asian.⁷

To better understand qualifying population #2 – At risk of Homeless we looked at participants coming through our coordinated entry system access points. The data used to evaluate this data is derived from our HMIS. In 2022, 35,642 participants were assessed through an access point. Of the total participants assessed, 6,059 (17 %) expressed a need for homelessness prevention services. See Table 15 below. In addition, during our HOME ARP community consultation, households identifying with or without children at risk of homelessness described financial barriers that ranged from eviction prevention assistance, to first month and security deposits to utility assistance plus supportive services.

2022 Coordinated Entry Access Points Requests		
Project/Program Type	Total	Percentage
Emergency Housing: Homeless	24237	68%
Prevention Support: At-risk of Homelessness	6059	17%
Fleeing, or attempting to flee, domestic violence	3564	10%
Diversion Assistance: Other Populations	1782	5%
	35642	

Source: HMIS
Table 14

The City of Philadelphia received Emergency Rental Assistance Program funds, which assisted these households with rent and utility costs, totaling \$145 million in FY20 with an additional \$100 million awarded in FY21. OHS also partnered with the Office of Community Empowerment and Opportunity (CEO) to advocate for the Advance Child Tax Credit for HUD-assisted families highlighting the impact the additional money would have on families to help maintain housing and to lift families out of homelessness.

Size and Demographic Composition: At Risk of Homelessness

Philadelphia's Coordinated Entry and Assessment-Based System (CEA-BHRS) operates access points throughout the Philadelphia jurisdiction, conducting assessment and referral for the homeless system of the Philadelphia CoC, but also information and referral support for individuals seeking housing assistance and other relevant services. In the annual data snapshot report for 2022, CEA-BHRS reported 35,642 contacts attributed to Coordinated Entry. Of these, the largest need identified was emergency shelter for clients experiencing homelessness (68%), followed by clients at-risk of homelessness seeking prevention support (17%), shelters for domestic violence survivors (10%), and clients seeking assistance with housing (5%). Clients may express multiple needs, so these percentages are not mutually exclusive.

⁷ PEW Philadelphia: State of the City. Retrieved from: <https://www.pewtrusts.org/en/research-and-analysis/reports/2022/04/philadelphia-2022-state-of-the-city>

RTC DEMOGRAPHIC COMPARISON						
	Percent of Renters: Ethnicity ⁵	Percent of Renters: Race ⁵			Percent of Renters: Gender ⁵	Family Poverty ⁵
	HISPANIC	BLACK	WHITE	ASIAN	FEMALE HEADED HOUSEHOLDS	<200% FPL
RTC Participants	<1% ⁶	87%	4%	0.5%	79%	100%
Population of 19121 ⁷	7.90%	73.5%	19.7%	3.6%	58.4%	55.7%
Population of 19139 ⁷	4.0%	78.9%	11.1%	0.9%	54.3%	56.5%

Source: RIGHT TO COUNSEL ANNUAL REPORT FY2022

Table 15

In 2022, 6049 participants were assessed at a CEA-BHRS access point and expressed a need for homelessness prevention services, representing 17% of all participants served in 2022. The demographics composition of QP 2- At risk of homelessness - based on age, race, ethnicity, gender and household type are below. See Tables 16, 17, 18, 19 and 20.

2022 Prevention by Age		
Age	Participant Count	Percentage
Under 18 in Households with Children	1998	33%
18 - 24	1920	32%
25 - 61	2050	34%
62 and older	91	2%
	6059	

Source: HMIS

Table 16

2022 Prevention by Race		
Race	Participant Count	Percentage
American Indian, Alaska Native, or Indigenous	58	1%
Asian or Asian American	161	3%
Black, African American, or African	5314	88%
Client doesn't know	73	1%
Data not collected	58	1%
Multi-Racial	146	2%
White	248	4%
	6059	

Source: HMIS

Table 17

2022 Prevention by Ethnicity		
Ethnicity	Participant Count	Percentage
Hispanic/Latin(a)(o)(x)	364	6%
Non-Hispanic/Non-Latin(a)(o)(x)	5695	94%
	6059	

Source: HMIS

Table 18

2022 Prevention by Gender		
Gender	Participant Count	Percentage
Female	3889	64%
Male	2170	36%
Transgender, Gender Non-conforming, Questioning, or Multiple Gender Individuals	64	1%
	6059	

Source: HMIS

Table 19

2022 Prevention by Household Type				
Household Type	Participant Count	Percentage	Youth Households	Percentage of Youth Households
Adults & Children	4952	82%	297	6%
Adults Only	1092	18%	66	
Children Only	15	0.24%	1	
	6059		364	

Source: HMIS

Table 20

Unmet Housing and Service Needs: At Risk of Homelessness

In 2022, Philadelphians had various worries on their minds, including a slowing economy, increasing housing costs, lingering inflation, and a stubbornly high poverty rate. Most of all, residents were affected by the rampant gun violence and high level of crime in the city, coupled with the open drug market and opioid crisis.

According to Community Legal Services, Philadelphia was the fourth highest evicting city in the nation, where 87 percent of Philadelphia landlords have access to an attorney, compared to 16 percent of renters prior to 2019. The eviction crisis disproportionately affected communities of colors, especially black female tenants. Additionally, the ongoing COVID-19 pandemic significantly increased the impact of evictions, which destabilizes households and can lead to displacement, job loss, and mental and physical health impacts for adults and children.

In 2019, legislation providing for guaranteed legal representation, known as Right to Counsel (RTC), was passed by Philadelphia’s City Council to address this. City regulation further defining the program was enacted in December 2021. The program began in February 2022. To qualify, participants must have an income at or below 200% of the federal poverty level. Since it was launched, RTC participants were a majority Black (87%) and had a female head of household (79%).

Philadelphia’s Right to Counsel law guarantees free legal representation to eligible low-income renters. Eligible renters have a Right to Counsel when they face:

- Eviction proceedings.
- Lease or other tenancy termination proceedings.
- PHA housing subsidy termination proceedings.

Throughout Philadelphia, many residents struggled to find suitable housing at an affordable price. Nearly 49% of the city’s households were spending at least 30% of their income on rent, making them “cost burdened” according to the standard set by the U.S. Census Bureau. Although housing costs in Philadelphia remained relatively low compared with other large cities in the Northeast, they were high for the nearly 23% of residents living below the poverty line (\$25,750 for a household of four) and the tens of thousands more living just above it. Households in parts of West and North Philadelphia had the highest share of cost-burdened renters. Table 21 demonstrates the 2022 prevention unmet need based on participants being assessed by an access point and exiting the system to either a permanent destination such as, a rental subsidy or to a temporary destination such as, emergency housing or safe haven.

2022 Prevention Unmet Need		
Prevention Destinations	Participant Count	Percentage
Permanent Destination	2779	45.9%
Temporary Destination	158	2.6%
Unmet Need	3123	51.5%
	6059	

Source: HMIS

Table 21

As noted in Table 21, Philadelphia has a significant shortage of affordable rental units for people who have very low incomes (30% AMI and below); in total, 111,235 Philadelphia households are in need of affordable and safe rental units. According to the National Low Income Housing Coalition’s (NLIHC) study of A Shortage in Affordable Homes published in March 2021, in the Phila-Camden-Wilmington MSA, there are only 30 affordable and available rental units per 100 households living at or below 30% AMI (extremely low income) and 59 per 100 at or below 50% AMI.

% of Renter Households with Cost Burden				
	Pennsylvania	New York-Newark-Jersey City, NY-NJ-PA (Metro)	Philadelphia-Camden-Wilmington, PA-NJ-DE-MD (Metro)	Pittsburgh, PA (Metro)
AT EXTREMELY LOW INCOME	83%	86%	87%	78%
EXTREMELY LOW INCOME TO 50% AMI	70%	80%	76%	62%
51% TO 80% AMI	33%	56%	42%	24%
81 TO 100% AMI	11%	31%	11%	15%
Source: National Low Income Housing Coalition. https://nlihc.org/gap/state/pa				

Table 22

Gap Analysis: At Risk of Homelessness

According to WHYY, since 2020, more than 4,000 landlord-tenant pairs have participated in various versions of the diversion program. Nearly 75% of them have reached an agreement that keeps tenants in their homes, according to the city. For cases where an agreement was not reached, the tenant is at risk of eviction. Despite Right to Counsel, there is still a gap in service for those at risk of homelessness.

RTC DEMOGRAPHIC COMPARISON						
	Percent of Renters: Ethnicity ⁵	Percent of Renters: Race ⁵			Percent of Renters: Gender ⁵	Family Poverty ⁵
	HISPANIC	BLACK	WHITE	ASIAN	FEMALE HEADED HOUSEHOLDS	<200% FPL
RTC Participants	<1% ⁶	87%	4%	0.5%	79%	100%
Population of 19121 ⁷	7.90%	73.5%	19.7%	3.6%	58.4%	55.7%
Population of 19139 ⁷	4.0%	78.9%	11.1%	0.9%	54.3%	56.5%

Source: RIGHT TO COUNSEL ANNUAL REPORT FY2022

Table 23

In 2022, those who sought homeless prevention services from OHS either worked and on average made \$1806/month or received disability benefits averaging \$678/month but were needing housing assistance or other supportive services. In addition, over 3411 unique households with no income sought assistance. See Table 24.

2022 Prevention Participant Income			
Type of Prevention Participants	Household Count	Percentage	Average Income per Month
Participants Employed	569	14%	\$ 1,806.00
Participants receiving Disability Benefits	81	2%	\$ 678.00
Participants with No Income	3411	84%	
	4061		

Source: HMIS

Table 24

Despite serving 4061 households, in 2022 with homeless prevention assistance, we were unable to serve an additional 1,998 households seeking assistance because we ran out of funding. Because of this, we had to divert the 1,998 households to other agencies for potential assistance, but assistance wasn't guaranteed. See Table 25.

The total gap of those at-risk of homelessness needing prevention services was 1,998 households. Among the total number of participants at risk of homelessness (6,059), 3,123 could not be provided with permanent or temporary shelter and 1,998 could not be served with Prevention Assistance."

2022 Prevention Gap for those At-risk of Homeless		
	Household Count	
Prevention Households requesting assistance	6059	
Prevention Households able to serve	4061	
Households unable to be served with Prevention Assistance	1998	Gap

Source: Philadelphia Homeless Management Information System

Table 25

Qualifying Population 3 - Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

According to the National Network to End Domestic Violence's (NNEDV) 16th Annual Domestic Violence Counts Report for Pennsylvania, 2,214 victims of DV were served across all programs statewide in one day on September 9, 2021. This includes 1,268 adult and child victims who were served in emergency shelters, transitional housing, hotels, motels, or other housing provided by Victim Service Providers.

Domestic violence intersects with poverty, homelessness and job instability that significantly limits survivors' abilities to escape abuse. In Philadelphia, lack of affordable housing, widespread poverty and high rates of community violence result in insurmountable obstacles for adults seeking long-term and sustainable safe living situations. Individuals experiencing domestic violence are also more likely to experience under- or unemployment due to the cycle of power and control implicated in domestic violence dynamics. Although domestic violence impacts individuals from all backgrounds, the need for domestic violence services in Philadelphia, the poorest major city in the country, is particularly pronounced. According to 2022 Pew State of the City, poverty disproportionately impacts people of color, single mothers and children — compared with a citywide poverty rate of 23%, 28% of African Americans, 32% of Hispanics and 22% of Asians, half of single mothers, and one in three children live in poverty. Abused individuals in poverty experience the greatest difficulty in gathering the resources to seek safety. With limited financial resources, victims are forced to navigate difficult choices, particularly if they have children. Often, the only alternative to abuse is homelessness. On an average night, 277 homeless individuals in Philadelphia self-report as victims of domestic violence, according to the 2022 PIT count.

The Office of Domestic Violence Strategies and OHS support the work of Shared Safety Philadelphia, a coordinated community response to relational violence. Shared Safety is a collaborative that coordinates Philadelphia's health and human service efforts to identify underlying trauma related to domestic violence in effort to expand our capacity to protect and serve our community and change the social norms that perpetuate violence. Examples of this work include the Women Against Abuse (WAA) Chat Program using voice and text and reaching beyond Phila and US borders, the use of Google chat for survivors who have LEP, emergency hotel placement collaboration, the use of very flexible financial and rental assistance to prevent homelessness and promote safety and. Fifty youth (ages 4-17) participated in 250 culturally competent counseling sessions designed specifically for young people who were witnesses to violence or experienced dating violence.

In addition, the Philadelphia Anti Trafficking Coalition brings together affiliates of social service providers, law enforcement, health care workers, community organizations, community members, and survivors. This coalition helps foster training events and awareness raising throughout the Philadelphia region, in addition to legislative advocacy.

Size and Demographic Composition: Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

While there are some local and statewide data sources available on the Domestic Violence/Sexual Assault/Trafficking qualifying population, the data is aggregated and does not include demographic or household level information. Therefore, OHS included national advocacy group reports and surveys, CoC domestic violence programs, and national trends, as well as local CoC data, to complete this analysis.

Discrepancy between data from the National Network to End Domestic Violence's (NNEDV) and data provided by CoC providers is due to the geographic scale of each. NNEDV uses a statewide survey that covers all CoCs, while CoC data presented here is for the Philadelphia CoC. While demand trends appear consistent statewide, raw numbers of individuals presented in the CoC data may be underreported due to the challenges in data collection.

National Statistics of Human Trafficking (2019) highlights the following:

- 48,326 contacts to the national trafficking hotline
- 22,326 human trafficking victims and survivors identified
- 11,500 human trafficking cases
- 4,384 potential traffickers identified
- 1,912 suspicious businesses identified
- 271 cases in Pennsylvania

Covenant House of Pennsylvania:

- 1 in 5 homeless youth have been victims of trafficking
- 95% of sex trafficked youth report a prior history of abuse (48% sexual abuse)
- 22% of homeless youth reported being offered money in exchange for sex the first night they were homeless

- 41% of sex trafficked youth report being in the child welfare system o 60% of transgender youth report being victims of trafficking
- 58% of trafficked youth reported there was no caring adult in their life
- Survival sex is a form of human trafficking
- Average age of entry into “the life” is 12/13 years old
- Traffickers have no “dress code” – 80% of victims knew their trafficker; 40% were familial

Data specific to human trafficking from the National Human Trafficking Hotline shows that in 2020, 221 new cases were recorded statewide for Pennsylvania. Of these cases, 159 were opened based on a trafficking tip from the caller. Access to service referrals and requests for crisis assistance related to human trafficking were recorded in 62 of the total new cases.

According to the Human Trafficking Prevalence and Child Welfare Risk Factors Among Homeless Youth 2018 report, The Field Center completed a three-city study as part of a larger initiative by Covenant House International to research human trafficking among homeless youth encompassing nearly 1,000 young people across 13 cities. The Field Center interviewed a total of 270 homeless youth, 100 in Philadelphia, 100 in Phoenix, and 70 in Washington, DC, to learn about the prevalence of human trafficking, and the history of child maltreatment, out of home placement, and protective factors among those who were sex trafficked or engaged in the sex trade to survive. Of those interviewed, 20% were victims of human trafficking, including 17% who were victims of sex trafficking and 6% who were victims of labor trafficking. Fourteen percent engaged in “survival sex” to meet their basic needs. A total of 36% of those interviewed reported engaging in a commercial sex act at some point in their lives. See links below.

<https://fieldcenteratpenn.org/wp-content/uploads/2022/12/6230-R10-Field-Center-Full-Report-Web.pdf>

<https://fieldcenteratpenn.org/wp-content/uploads/2022/12/6232-R9-Philadelphia-Site-Report-Web.pdf>

According to the City of Philadelphia Office of Domestic Violence Strategies, in FY 22, there were more than 10,000 calls to the DV hotline, including more than 50 where translation services were utilized. In FY 22, according to HMIS data and victim services comparable data, we served 633 families and 694 single adults fleeing or attempting to flee domestic violence. See Table 25.

2021/2022 Households served Fleeing or attempting to Flee Domestic Violence				
Category	2021	2021	2022	2022
	Number of Families	Number of Single Adults	Number of Families	Number of Single Adults
Fleeing, or attempting to flee, domestic violence	615 households	700 people	633 households	694 people

Source: HMIS
Table 26

In 2022, 8,583 men, 6,157 women, and 96 other gender non-conforming participants were assessed and asked to identify whether they were fleeing domestic violence, sexual assault, intimate partner violence, and/or stalking. See Table 26. The demographics composition of this QP 3 – Domestic violence, dating violence, sexual assault, stalking, or human trafficking – is based on gender and household type.

Tables 26, 27 and 28 reflect demographic estimates and extrapolation based on national and local data sources. These rough estimates only paint the picture of the possible needs of Philadelphia. This is based on specific high traffic areas of the city identified through City outreach initiatives in Kensington and North Philadelphia neighborhoods.

2022 Sexual Assault, Intimate Partner Violence, and Stalking Data							
	FY2022 HMIS Data and Comparable Database data	Sexual Assault		Intimate Partner Violence		Stalking	
		Women	Men	Women	Men	Women	Men
		33%	16%	27%	11%	33%	16%
Men	8583		1373		944.13		1373
Women	6157	2032		1662.39		2032	
Other*	96						
Total (estimate based on National %))			3405		2607		3405

*Based on reports, LGBTQ population is likely to experience higher instances of DV - couldn't find sufficient data

Source: HMIS
Table 27

Race

According to the National Coalition Against Domestic Violence (NCADV), people who identify as Black experience domestic violence at a disproportionately high rate, with 45.1% of Black women and 40.1% of Black men experiencing intimate partner violence or stalking in their lifetimes. NCADV also points out that American Indian and Alaska native women experience domestic violence at much higher rates than any other ethnicity, with 55.5% experiencing intimate partner violence and 66.6% experiencing psychological abuse in their lifetimes. According to the CDC, Hispanic women experience domestic violence at similar rates as the overall female population but may experience more severe barriers to services when culturally and linguistically appropriate programs are not available. It appears that these national trends hold relatively true in Philadelphia. See Table 27. However, stalking, sexual assault, intimate partner violence and human trafficking makes it impossible to track among certain populations within this Qualifying Population at the local level because these data elements are not captured in the data set.

FY2022 Fleeing or attempting to flee Domestic Violence				
Race	Participant Count	% of Participants	Household Count	% of Households
American Indian, Alaska Native, or Indigenous	3	0.19%	3	0.19%
Asian or Asian American	13	0.77%	10	0.77%
Black, African American, or African	1298	78.93%	989	74.52%
Multi-Racial	41	2.49%	33	2.49%
Native Hawaiian or Pacific Islander	3	0.19%	3	0.19%
White	268	16.28%	211	15.90%
Hispanic/Latin(a)(o)(x)	161	9.77%	10	0.77%
Total	1644		1327	

Source: HMIS

Table 28

Household Composition

According to HMIS data, in 2021, 6% of active participants assessed through coordinated entry and placed in emergency shelter, safe havens or transitional housing had a history of DV, whereas in 2022, 4% had a history of DV in emergency shelter, safe haven and transitional housing. (*DV status is highlighted in the charts below*). See Tables 28 and 29.

2021 Number Served and History of DV status for select projects								
People served								
Household Type	Blank	Client doesn't know	Client refused	Data not collected	No	Yes	Total	History of DV as % of Total People Served
Adults & Children	7						7	0.00%
Adults Only	399	1	1	4	311	46	746	6.17%
Children Only	3						3	0.00%
Unknown	1			1			2	0.00%
Total	410	1	1	5	311	46	758	6.07%
Households served								
Household Type	Blank	Client doesn't know	Client refused	Data not collected	No	Yes	Total	History of DV as % of Total Households Served
Adults & Children	4						4	0.00%
Adults Only	399	1	1	4	310	46	744	6.18%
Children Only	2						2	0.00%
Unknown	1			1			2	0.00%
Total	406	1	1	5	310	46	752	6.12%

Source: HMIS
Table 29

2022 Number Served and History of DV status for select projects							
People							
Household Type	Blank	Client doesn't know	Data not collected	No	Yes	Total	History of DV as % of Total People Served
Adults & Children	6					6	0.00%
Adults Only	687	1	16	221	42	948	4.43%
Children Only	5					5	0.00%
Unknown	2		1			3	0.00%
Total	700	1	17	221	42	962	4.37%
Households							
Household Type	Blank	Client doesn't know	Data not collected	No	Yes	Total	History of DV as % of Total Households Served
Adults & Children	4					4	0.00%
Adults Only	686	1	16	220	42	945	4.44%
Children Only	3					3	0.00%
Unknown	2		1			3	0.00%

Source: HMIS
Table 30

Unmet Housing and Service Needs: Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

This section describes unmet needs based on the available statistics for those experiencing domestic violence in Pennsylvania. According to NNEDV, on September 9, 2021, victims made 152 requests for services that went unmet due to lack of resources. Of the 152 unmet requests, approximately 36% were for emergency shelter. In FY 2020, 4,086 requests for shelter through the DV hotline went unmet due to lack of capacity.

The 2022 Housing Inventory Chart (HIC) for Philadelphia indicates that there are 5,145 emergency shelter, transitional housing, and safe haven beds citywide. Of those beds, 4,875 are specified as non-DV beds, indicating that there are 270 beds citywide dedicated for people fleeing or attempting to flee domestic violence. Of the 270 citywide beds for DV, 188 of them are emergency shelter specifically. When examining the inventory of DV beds, it is important to consider utilization rates of existing beds. The following table summarizes utilization rates based on HIC data. See Table 30.

HIC Utilization Rates		
	Shelter & Transitional	Shelter Only
Average	56%	57%
Median	72%	41%

Source: HMIS

Table 31

The lack of data related to stalking, sexual assault, intimate partner violence and human trafficking makes it impossible to track among certain populations within Qualifying Population – 3 at the local level. These data elements are not captured in any data set at the local level.

Gap Analysis: Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

According to the Human Trafficking Prevalence and Child Welfare Risk Factors Among Homeless Youth 2018 report, an estimated 2,500 to 3,000 people typically seek housing and shelter services under OHS’s jurisdiction during a given year. According to the Philadelphia Domestic Violence Hotline, counselors were not able to assist with 1,177 requests for shelter due to lack of beds in Fiscal Year 2022. Based on 2022 HIC, our system had 270 DV beds and median utilization in shelters shown in Table 31 (41% median utilization). With HOME-ARP funds we can close this gap. In addition, we will ensure geographic distribution of available DV beds are factored in when developing non-congregate DV housing beds.

When it comes to collecting data on dating violence, sexual assault, stalking, or human trafficking, we do not currently track this data. However, based on emergent needs we are now working to expand these data collection efforts through our coordinated entry. For example, we are developing assessment questions in HMIS and comparable databases to determine the true unmet need for these specific sub-populations.

Qualifying Population 4 - Other Populations

OHS coordinates with DHCD and does not define additional characteristics associated with instability and increased risk of homelessness in the approved 2022 – 2026 Consolidated Plan beyond that which is defined in the HOME-ARP Notice. Section AP-90 Program Specific Requirements of the 2022 – 2026 Consolidated Plan states that ESG sub-recipients “shall not use the risk factor for homeless allowed under paragraph 576.2 related to ‘otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.’” Based on this, OHS will use the definition for “At Greatest Risk of Housing Instability” contained in CPD-21-10, except that no additional risk factors will be incorporated pursuant to Section IV.A.4.2.ii.G.

Size and Demographic Composition: Other Populations

Data sources on Other Populations are less robust than the other QPs. However, CEA-BHRS, HMIS data, the statewide Emergency Rental Assistance Program (ERAP), and information gathered through HOME-ARP consultation meetings triangulated with statewide Comprehensive Housing Affordability Strategy (CHAS) data, provide a strong understanding of the size, demographic makeup, and needs of this population. ERAP was a US. Department of Treasury program funded through states and other administrators. Philadelphia’s ERAP program was established in 2021 to assist at-risk populations with mitigating the financial impacts of the COVID-19 pandemic. While eligibility criteria for ERAP do not match those of HOME-ARP, utilization of the program provides a useful source of data to help quantify housing instability across the jurisdiction. Eligible households were required to meet the following criteria:

A household must be responsible to pay rent on a residential property, and

- One or more people within the household have qualified for unemployment benefits, had a decrease in income, had increased household costs, or experienced other financial hardship due directly or indirectly to the COVID-19 pandemic;
- One or more individuals in the household can show a risk of experiencing homelessness or housing instability; AND
- Household has an income at or below 80 percent of Area Median Income (AMI).

According to the Philadelphia Community Development Corporations (PACDC), more than 85,000 extremely low-income Philadelphians pay more than half of the income on rent, this leads little for food, healthcare, transportation, and other basic expenses. Just one emergency can cause homelessness.

According to the Housing Alliance of Pennsylvania, the lack of affordable housing leads to deep rent burdens, and this burden is not felt equally. In Philadelphia, renters of color are more likely to face unaffordable rents, with 62% of Latino renters paying more than 30% of income on rent.

In Philadelphia, 23% of Philadelphians are living in poverty, of which 11% are in deep poverty made up of women and children. Hispanics have the highest poverty rate 32.5% followed by Blacks 28.3%, and 21.9% Asian.⁸ Based on 30% AMI in Philadelphia, see Table 32.

2022 Philadelphia Annual Median Income (AMI)	
Household Size	30% AMI
1 - Person	\$ 22,150.00
2 - People	\$ 25,300.00
3 - People	\$ 28,450.00
4 - People	\$ 31,600.00
5 - People	\$ 34,150.00
6 - People	\$ 37,190.00
7 - People	\$ 41,910.00
8 - People	\$ 46,630.00

Source: https://www.dhs.pa.gov/ERAP/Documents/AMIs_for_2022_2021_2020.pdf

Table 32

COVID – 19 Emergency Rental and Utility Assistance Program (ERAP)

The City's eviction prevention, rental and utilities assistance program was administered by PHLRentAssist, a collaboration between City of Philadelphia and the non-profit Philadelphia Housing Development Corporation (PHDC). In FY2022 (July 1, 2021, through June 30, 2022), this program made \$173,589,302 in direct payments to assist 21,456 households with rent and utilities. It was vital in preventing households from becoming homeless and lessened the impact of the pandemic on families at risk of homelessness. Full history of program spending, along with demographic information, on the program dashboard can be found on the program website: <https://phlrentassist.org/dashboard/>

Notably, with the end of COVID-era economic stimulus funds to individuals, and the childcare tax credit, homelessness has once again risen to pre-pandemic levels demonstrating the positive impact of direct financial assistance made available during the pandemic. With the end of the COVID-era eviction moratorium, and Emergency Rental and Utility Assistance Program (ERAP), evictions have once again risen, and eviction related homelessness re-emerged.

Table 33 reflects the demographics of those served by ERAP.

⁸ PEW Philadelphia: State of the City. Retrieved from: <https://www.pewtrusts.org/en/research-and-analysis/reports/2022/04/philadelphia-2022-state-of-the-city>

Demographics of Phase 4 Approved Applicants

Household Income*		Race (primary)		Ethnicity (primary)		Age (primary)	
<30% AMI	75.8%	American Indian or Alaska Native	0.2%	Do Not Wish To Answer	11.7%	18-20	1.5%
31%-50% AMI	17.2%	Asian	1.4%	Hispanic or Latino	9.2%	21-30	29.3%
51%-80% AMI	7.0%	Black or African American	66.4%	Not Hispanic or Latino	79.1%	31-40	32.1%
* Percentage of AMI refers to the household's income in relation to the Area Median Income for the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD MSA, as established by the U.S. Department of Housing and Urban Development (HUD).		Native Hawaiian or Other Pacific Islanders	0.2%	Gender Identity (primary)		41-50	17.4%
		Other	15.7%	Female	67.0%	51-60	12.2%
		Two or More	5.7%	Male	27.2%	61-70	5.5%
		White	10.4%	Nonbinary	1.0%	71-80	1.1%
Families with Children				Do Not Wish To Answer	4.8%	81-90	0.1%
Yes	47.7%					90+	0.0%
No	52.3%					Not available	0.8%

Source: Data Dashboard for the Emergency Rental Assistance Program (ERAP),
<https://phlrentassist.org/dashboard/>
 Table 33

The demographics in Table 33 represent an overall of 46,518 households that were served throughout the four rounds of rental assistance that would not otherwise qualify under one of the above-mentioned qualifying populations, yet still expressed housing instability concerns at entry into the emergency housing assistance system. This is supported with qualitative data collected through the HOME-ARP consultation meetings where Other Populations were often described as unable to access the homeless services system due to income eligibility restrictions yet struggling to maintain housing security in a housing market with inflated rents.

Housing Analysis: Cost of Housing

The Pew Charitable Trusts, in their 2021 State of the City report, notes that from 2009-2019 the homeownership rate in Philadelphia stayed constant and the percentage of mortgages in delinquency decreased. Regarding the impact of the pandemic, Pew states, “In a challenging year, the housing market was a bright spot in Philadelphia. The city issued 58% more residential building permits in 2020 than in 2019, a show of developers’ confidence in the local housing market. Although home sales dropped to approximately the same total as in 2016, the median home sale price was the highest on record, at \$204,500, with the bulk of sales occurring in the final six months of the year—after the pandemic’s impact had become clear.” The report further highlighted figures showing that owner-occupied and renter occupied units have both shown steady increases from 2016 to 2019. As Pew states, “In 2019, 52% of housing units were owner-occupied, and 48% were renter-occupied.”

Despite positive trends, Pew goes on to highlight that “Almost 52% of renters spent 30% or more of their income on rent and utilities, the highest rate among the comparison cities.” As previously noted in this plan, housing affordability is the primary issue facing low- and moderate-income households, and limited housing supply exacerbated by the pandemic has made housing that much more unaffordable and housing options that much more limited for Philadelphia’s lower income households. Taken together, these findings emphasize the need to bolster the production and preservation of affordable housing stock, as rents and home prices continue to rise.

Cost of Housing

	Base Year: 2015	Most Recent Year: 2020	% Change
Median Home Value	145,300	171,600	18%
Median Contract Rent	742	887	20%

Source: Alternate Data Source Name: 2016-2020 ACS

Table 34

Rent Paid

Rent Paid	2015#	2015%	2020#	2020%
Less than \$500	51,197	25.2%	37,368	13%
\$500-999	153,212	56.0%	133,708	48%
\$1,000-1,499	37,102	11.9%	66,464	24%
\$1,500-1,999	13,348	4.4%	23,629	9%
\$2,000 or more	8,438	2.6%	16,695	6%
Total	263,297	100.0%	277,864	100%

Source: Alternate Data Source Name: 2016-2020 ACS

Table 35

What to know about Philadelphia inflation rates,⁹

- By April 2022, average rents in the U.S., Greater Philadelphia, and the City of Philadelphia were 16.4 percent, 11.6 percent, and 8.5 percent greater than they had been in April 2021, respectively.
- Prior to the pandemic, it took two-plus years for average rents to increase by \$100. In the year from April 2021 to April 2022, average rents increased by \$197.
- At 48.1 percent, the City of Philadelphia has the fifth highest proportion of rent-burdened among the ten largest U.S. cities in 2020.
- Philadelphia's proportion of rent-burdened outpaces larger cities, like Chicago and Phoenix, by more than 3.0 percent and is 2.4 percent greater than the national average.
- As of March 2022, the City of Philadelphia's average rent was 19 percent higher than it had been in January 2018, but the average hourly wage was only 2.5 percent higher; this indicates that there is a 16.5 percent gap between the average growth of rents and that of wages in Philadelphia.

As with data on at-risk homelessness, some data sources provide only statewide information for other HOME-ARP eligible populations. Data from the Comprehensive Housing Affordability Strategy (CHAS), 2014-2018 for Philadelphia reveals that 55,870 renter households with income between 30%-50% of Area Median Income have one or more severe housing problems, defined as incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, or cost burden greater than 30%.

Unmet Housing and Service Needs: Other Populations

⁹ Economy League: Greater Philadelphia, <https://economyleague.org/providing-insight/leadingindicators/2022/05/16/risingrentsmar2022update#:~:text=By%20April%202022%2C%20average%20rents,rents%20to%20increase%20by%20%24100.>

For Other Populations, where providing supportive services or assistance under section 212(a) of the Act ([42 U.S.C. 12742\(a\)](#)) in order to prevent the family’s homelessness or to serve those with the greatest need of housing instability returning citizens, those who are couch surfing or doubled up are most vulnerable in Philadelphia. The Latinx community is often in this population.

Returning Citizens

According to the Office of Reentry, returning citizens face systemic barriers to stable housing. This is evidenced by the representation of formerly incarcerated individuals within Philadelphia’s unhoused population in HMIS. See Table 35.

Black and brown Philadelphians face a disproportionate burden regarding housing upon reentry, given the overrepresentation of both within the incarcerated and unhoused populations. We do not have enough available affordable permanent housing placement for men and women exiting Philadelphia prisons and jails, which results in a greater likelihood of individuals ending up in a cycle of housing instability, homelessness and subsequent incarceration.

Access to affordable, safe, and stable housing can jeopardize successful reentry and disrupt all other efforts to support returning resident’s ability to access benefits and services. Systemic barriers facing individuals with arrest and conviction histories make securing housing incredibly difficult. Criminal background checks are the largest barrier to obtaining housing. Without IDs, disrupted jobs and poor credit, returning residents face an uphill battle when completing rental applications. Moreover, some may not know how to fill out a rental application; know what it means to be a good tenant or have the digital literacy skills to navigate the rental process. Additional barriers such as screening criteria.

FY2022 Returning Citizens		
Prior Residence	Participant Count	% of Total Participants Served
Jail, prison or juvenile detention facility	144	1%

Source: HMIS
Table 36

Doubled-up or Couch Surfing

In Philadelphia, most participants who are doubled-up or couch surfing do not meet the traditional HUD homelessness definition. We see this in the Latinx community and amongst youth and young adults (YYA). Through the Education of Children and Youth Experiencing Homelessness (ECHYEH) program in the School District of Philadelphia (SDP), an analysis comparing FY 2020 to FY 2021 – Data showed that a smaller percentage of students were identified as homeless in the FY2021 school year compared to the FY 2020 school year. Also, there are many ways that students were identified as homeless, resulting in 2,251 students being identified in the FY2021 school year. See Table 36, 37. However, we suspect that the actual number of students experiencing homelessness is still higher than presented due to the

challenging nature of identifying this population. This also remains true for the Latinx community. See Table 39.

Students identified as homeless at any point during FY2021	
Category	Number of Identified Students
SDP Students*	1,487
Charter Schools	205
Not yet school-aged (0-5 years old)	408
Other Students Identified*	151
Total	2,251

Source: ECHYEH
Table 37

Students experiencing homelessness by living arrangement		
Living Arrangement	Total K-12 Students Experiencing Homelessness	Total Children Experiencing Homelessness, Ages 0-5
	Number of students (% of identified students experiencing homelessness)	Number of children (% of identified students experiencing homelessness)
Doubled up	1,067 (57.9%)	218 (53.4%)
Shelter/transitional	674 (36.6%)	183 (44.8%)
Unaccompanied	207 (11.2%)	3 (0.7%)
Other/hotel	73 (4.0%)	7 (1.7%)
Unsheltered	18 (.98%)	0

Source: ECHYEH
Table 38

FY2022 Doubled-Up or Couch Surfing		
Prior Residence	Participant Count	% of Total Participants Served
Staying or living in a family member's room, apartment or house	136	0.92%
Staying or living in a friend's room, apartment or house	132	0.90%
Total	247	1.68%

Source: ECHYEH
Table 39

Gap Analysis: Other Populations

Philadelphia has a shortage of quality affordable housing. According to the Consolidated plan, roughly 154,000 Philadelphians—more than one in four—live under 30 percent of the Area Median Income (AMI) of \$38,253 and over half (52%) of Philadelphians pay more than 30 percent of their income on rent, this reflects low incomes and unaffordable housing, rather than simply high rent costs. In addition, there are only 37 affordable housing units for every 100 extremely low-income households (\$23,850 or less per year). This means over 60 percent of extremely low-income households must maintain housing above their means, a recipe for financial instability.

Characteristics of housing associated with instability and increased risk of homelessness are defined as:

- Threat of eviction
- Not holding a lease
- Very low income and very high rent burdens
- Substandard housing
- Overcrowded conditions
- Recent episodes of homelessness

Philadelphia County ACS and CHAS data suggest a significant gap in housing inventory for other qualifying populations in Philadelphia. With 99,255 households with income between 30-50% AMI and one or more severe housing problems, and only 10,635 rental units considered affordable for renters at this income bracket, approximately 36,445 households in other qualifying populations are living in rental units that may exacerbate their current housing situation. See Table 40.

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	279,680		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	28,440		
Rental Units Affordable to HH at 50% AMI (Other Populations)	10,635		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		74,790	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		36,445	
Current Gaps			111,235

Source: Philadelphia County ACS and CHAS data
Table 40

Extremely low-income (ELI) households (earning 0-30% AMI) and very low-income (VLI) households (earning 31-50% of AMI) experience substandard housing, severe overcrowding, and cost burden over 50 percent at disproportionately high rates.

The *Consolidated Plan* includes a detailed overview of barriers to affordable housing in Sections MA-40 and SP-55. These barriers impact HOME-ARP QP-4 as well. Barriers include:

- Displacement of residents due to economic pressures
- Lack of public investment in specific neighborhoods, including services and amenities
- Deteriorated vacant structures and land
- Location and type of affordable housing
- Inability to access existing housing and other resources
- Location and access to proficient schools
- Lack of income Availability of affordable units in a range of sizes
- Lack of communication between government and residents
- Residential foreclosures
- Residential evictions
- Age and condition of housing
- Lack of local private fair housing outreach and enforcement

Current resources available to assist qualifying populations

In 2022, the Philadelphia CoC's homeless assistance system, had a total 11,746 total beds (HIC), 31% of beds are Emergency Shelter, 9% of beds are Transitional Housing, 2% are Safe Haven, and 58% are dedicated to affordable permanent housing resources, that provide tenant-based rental assistance. See Table 41.

FY2022 Current Resources		
Project Types	Year-Round Beds	% of Beds
Emergency Shelter (ES)	3667	31%
Safe Haven (SH)	245	2%
Transitional Housing (TH)	1026	9%
Rapid Re-housing (RRH)	1512	13%
Permanent Supportive Housing (PSH)	5286	45%
Other Permanent Housing (OPH)	10	0.09%
Total Year-Round Beds	11746	100%

Source: 2022 HIC

Table 41

Supportive services are built into all the above-mentioned projects. Additional job placement services are offered in collaboration with Help for the Hurdles (job placement, transportation and childcare), Philadelphia Works and PA CareerLink system. The CoC has an additional 469 permanent housing units through various PHA and HUD resources including FUP Vouchers, PHA Blueprint (public housing conventional units), HUD Multi-Family and Mainstream Vouchers that are not included in the HIC.

In addition, the City currently makes available HOME, CDBG, HOPWA, Local Housing Trust Funds and Local Neighborhood Preservation Initiative (NPI) Bond Funds for the production and preservation of affordable and permanent supportive rental housing. Federal HOME and Local Housing Trust Fund dollars support homeless prevention programs.

City-supported development projects require a set-aside of units for people with special needs, those experiencing homelessness and have disabilities. Close collaboration among City agencies around redevelopment has ensured accountability for these set-asides, but they generally represent only between ten and twenty units a year.

Many affordable housing projects in Philadelphia leverage Low Income Housing Tax Credits. Often these projects focus on the low-income households at 50%-80% of AMI, as compared to the very low incomes of those experiencing homelessness, mostly 30% AMI and below. In addition, even when these essential projects commit to serve people with the lowest incomes, tenant selection criteria may screen out the most vulnerable individuals and families served through the homeless system.

The new Neighborhood Preservation Initiative (NPI) includes programs to be undertaken and/or administered by the Philadelphia Housing Development Corporation (PHDC) and the City to improve and enhance housing, small business, commercial corridors and neighborhood infrastructure within the City in order to promote the health, welfare and safety of the residents of the City, prevent and eliminate blight, and encourage the provision of healthful homes, a decent living environment and adequate places of employment for residents of the City through redevelopment, renewal, rehabilitation, housing, conservation, urban beautification and/or commercial section and neighborhood development activities.

Funding from NPI will come from two primary sources: tax-exempt and taxable bonds that will total \$400 million over 4 years through the following types of programs of which \$3.8M a year is dedicated to Permanent Homeless Housing.

Gaps within the current shelter and housing inventory as well as the service delivery system

42,935 households are affected by gaps in our current shelter and housing inventory. Gaps within the current shelter and housing inventory are identified for each QP (see Table 42).

Qualifying Population	Gaps Identified
QP1	3,315 households <ul style="list-style-type: none"> • 474 units for households with children and • 2,841 units for households without children
QP2	1,998 households
QP3	1,177 households
QP4	36,445 households

Table 42

Gaps in the service delivery system were identified through consultation with stakeholders. They include:

- Case management;
- Employment assistance and job training;
- Financial literacy
- Housing navigation;
- Landlord-tenant liaison services; and
- Life skills training;
- Mental health services;
- Outpatient health services;
- Outreach services;
- Services for special populations.
- Substance abuse treatment services;

Priority needs for qualifying populations

Philadelphia will administer all of the HOME-ARP allocation and ensure our community has the appropriate services and supports for HOME ARP projects. Priority needs for qualifying populations are:

- Affordable rental housing;
- Tenant-based Rental Assistance;
- Supportive Services:
 - Case management;
 - Employment assistance and job training;
 - Financial literacy;
 - Housing navigation;
 - Landlord-tenant liaison services; and
 - Life skills training;
 - Mental health services;
 - Outpatient health services;
 - Outreach services;
 - Services for special populations;
 - Substance abuse treatment services;
- Non-congregate shelter
- Nonprofit organization operating assistance
- Nonprofit capacity building

Philadelphia will administer the HOME-ARP allocation to serve all QPs. The activities will focus on the expansion of affordable housing units that could yield up to 351 new units.

HOME-ARP Activities

After a lengthy consultation and public input process, the review of the gaps and needs through data analysis of various sources, OHS intends to utilize HOME-ARP funding for the following eligible activities:

- Acquisition and Development of affordable rental housing;
- Tenant-based rental assistance (TBRA);
- Supportive Services;
- Acquisition and development of non-congregate shelter;
- Nonprofit organization operating assistance;
- Nonprofit capacity building;
- Administration and planning

During our consultation process 75% of the respondents prioritized the rehabilitation of vacant, blighted buildings for affordable housing for youth, seniors, couples and families.

Through the community consultation, the City identified that rental assistance is necessary to assist a participant out of their housing crisis.

Through the community consultation, the City identified that supportive services assist participants out of their housing crisis.

Through the community consultation and surveys conducted, the City identified that facilities should be acquired and developed to help expand access to resources for all QPs.

Through the community consultation and public comment, the City identified that we expand our coordinated entry system to serve all 4 QPs.

The following chart shows the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrates how Philadelphia plans to utilize a portion of funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs within the HOME-ARP limits. See Table 43.

Use of HOME-ARP Funding	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 5,040,000.00	12%	
Acquisition and Development of Non-Congregate Shelters	\$ 2,100,000.00	5%	
Tenant Based Rental Assistance (TBRA)	\$ 5,040,000.00	12%	
Development of Affordable Rental Housing	\$ 23,107,561.00	55%	
Non-Profit Operating	\$ 1,260,000.00	3%	5%
Non-Profit Capacity Building	\$ 1,260,000.00	3%	5%
Administration and Planning	\$ 4,200,000.00	10%	15%
Total HOME ARP Allocation	\$ 42,007,561.00		

Table 43

To coincide with the additional unit development, Philadelphia plans to increase supportive services for delivering housing stability benchmarks for participants through housing counseling and housing locator services for coordination efficiencies with landlord and supportive service agencies to ensure we maximize this resource. We determined that supportive services will be allocated in an equal distribution of the 12% of funding of HOME-ARP.

In addition, to help promote independent stable housing among participants we will look to use 12% of the allocation to go toward time limited tenant-based rental assistance based on people paying no more than 30% of their income.

To effectively carry out the above activities, we have determined that it is necessary that 10% of the funding allocation be used for administrative supports largely to provider agencies delivering HOME-ARP funded activities as well as compliance staffing to ensure appropriate use of the funds. In addition, 3% of the activities focus on capacity building, while 3% of the activities focus on non-profit operating costs of subcontracted providers of the selected activities.

OHS will oversee the administration of HOME-ARP funding but will not administer activities directly. OHS will enter into written contracts with the entities that will undertake the funded projects.

It should be noted that HOME-ARP administrative funds will not be provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

Method for Soliciting HOME-ARP Applications

Philadelphia proposes to utilize a competitive Requests for Proposals (RFP) process to solicit proposals for HOME-ARP programs, projects, and services – including TBRA providers -- from the large and diverse network of experienced developers and non-profit service providers. The City will utilize the standard solicitation process for soliciting applications submitted from developers, service providers, subrecipients and/or contractors to carry out all HOME-ARP activities. The criteria for selection of solicited applicants will include readiness to proceed, leveraging from other sources, and extent to which the project is led by or provides meaningful and representative opportunities for Minority, Woman, Disadvantaged, and Disabled Owned Businesses (M/W/DSBE) in accordance with the City's Economic Opportunity Plans requirements, and accessibility to people with disabilities.

RFPs are posted on the OHS and DHCD websites and sent out through various distribution lists. RFP information sessions are held in English and Spanish for interested stakeholders. Accessibility for people who have disabilities is provided upon request. The information sessions are recorded, stored on City websites, and shared with the community. RFP opportunities are marketed on social media and in OHS's biweekly email "Tools and Training" newsletter.

Minority, Woman, Disadvantaged, and Disabled Owned Businesses (M/W/DBE) are encouraged to apply; OHS works closely with the Office of Equal Opportunity to outreach to MWDBE providers. Materials are offered in English and Spanish.

OHS will issue RFPs to solicit proposals for supportive services and TBRA providers. The proposals will be blindly reviewed by a committee using a rubric and scoring criteria. Upon review of applications and selection of the projects, applicants will administer HOME-ARP activities directly through contractual agreements with the City of Philadelphia to administer the eligible project activities under our HOME-ARP allocation.

The RFP selection process for the acquisition and development of affordable rental housing and non-congregate housing is as follows:

- DHCD will issue an RFP to solicit proposals for the development of affordable housing projects.
- Proposals will be blindly reviewed by a committee using a rubric and scoring criteria.
- A committee comprised of staff from OHS, DHCD and PHDC and people with lived experience will conduct the review.

Selected acquisition, rehabilitation, and new construction projects will be underwritten and monitored through PHDC, but programmatically administered by OHS.

It should be noted that HOME-ARP administrative funds will not be provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

Rationale for the plan to fund eligible activities

The characteristics of the shelter and housing inventory, service delivery system, and the needs and gaps analysis indicate that there is a continuous gap in funding. Eligible activities were selected based on the gaps identified in this analysis and the community feedback received. The analysis and feedback both illustrate the need for more affordable rental housing development for people with the lowest or no income, specifically those experiencing homelessness. To accommodate the increase in demand for affordable housing, we also need to increase our housing locator services. In addition, we need to educate landlords around all housing subsidy options. Landlords have identified that the top four areas that are assessed in their determination are prior evictions, income regularity, income amount and employment. While this work is underway through the EHV program, expansion is needed to support people making the transition from homeless to housed.

In FY21, 28% of all people enrolled in emergency and transitional housing exited to permanent housing, an increase over FY20, but still far fewer than needed. This is directly related to the lack of affordable rental housing dedicated to those experiencing homelessness.

The following percentages represent the proposed allocation of HOME ARP funds:

- 55% of funds will be allocated towards acquisition and development of affordable housing rental units.

Majority of the community consultation responses and data analysis of HMIS data clearly show that the allocation of HOME-ARP funding should go toward the development of affordable housing. All of the 42,935 households within the four qualifying populations will be assessed for these affordable rental housing units.

- 12% of funds will be allocated towards tenant-based rental assistance
TBRA will allow for a temporary lift on any or all financial burdens a participant faces while addressing other barriers to becoming self-sufficient. With this allocated amount we will continue to address the demand for housing and strengthen landlord recruitment and retention efforts. All 42,935 households within the four qualifying populations will be assessed to prioritize who is eligible for tenant-based rental assistance.
- 12% of funds will be allocated towards supportive services to help individuals and families obtain and retain stable housing.
We will use the supportive services eligible activities primarily to help stabilize individuals and families in housing created by HOME-ARP. All 42,935 households of the qualifying populations will be assessed for the appropriate supportive services. Supportive services are voluntary but will be encouraged for those households in need. This allows agencies to connect participants with the proper resources and case management to lift someone out of their housing crisis and reach self-sufficiency by eliminating non-financial barriers. Consistent with the input from stakeholders, the types of services will include landlord recruitment, housing case management, access to childcare, education and employment.
- 5% of funds will be allocated towards acquisition and development of non-congregate shelters.
Through the analysis of the housing stock in Philadelphia, and the success of non-congregate shelters with older adults through the pandemic, OHS will continue efforts to work with community stakeholders to develop effective non-congregate shelters needed in key areas of the City. Of the 42,935 households a portion of the QPs will be served through non-congregate shelters.
- 3% of funds will be allocated towards Non-Profit Operating in our community.
Through the community consultation and surveys conducted, it has been identified the initial cost to help agencies operate new programs developed under HOME-ARP are necessary to ensure agencies are equipped to carry out day to day activities to deliver efficient services to qualifying populations, not covered under supportive service or rental housing staffing components. These funds will be administered to providers identified under an RFP that demonstrates ‘general operating expenses’ defined as reasonable and necessary costs of operating the nonprofit organization. These costs will include employee salaries, wages and other employee compensation and benefits; employee education, training, and travel; rent; utilities; communication costs; taxes; insurance; equipment, materials, and supplies.
- 3% of funds will be allocated towards Non-Profit Capacity Building Assistance in our community.
Through the community consultation and surveys conducted, it has been identified that agencies have funding to assist with building capacity to allow for agencies to expand or improve agency resources in order to operate new programs developed under HOME-ARP. The associated cost will include salaries for new hires including wages and other

employee compensation and benefits; costs related to employee training or other staff development that enhances an employee's skill set and expertise; equipment (e.g., computer software or programs that improve organizational processes), upgrades to materials and equipment, and supplies; and contracts for technical assistance or for consultants with expertise related to the HOME-ARP qualifying populations.

- 10% of funds will be allocated towards Administration and Planning.
Through the community consultation and surveys conducted, it has been identified that to effectively carry out HOME-ARP activities it is important ensure that set aside reasonable oversight to ensure compliance of overall HOME-ARP program management, coordination, monitoring, and evaluation. These costs will cover salaries, wages, and related costs of City staffing including HOME ARP coordinators that will be responsible for, but not limited to the following:
 - Developing systems and schedules for complying with HOME-ARP program requirements, including systems to prevent a duplication of benefits among beneficiaries of HOME-ARP activities;
 - Developing interagency agreements and agreements with entities receiving HOME-ARP funds;
 - Monitoring HOME-ARP activities for progress and compliance with HOMEARP program requirements;
 - Preparing HOME-ARP reports and other documents related to the HOME-ARP program for submission to HUD;
 - Coordinating the resolution of audit and monitoring findings on HOME-ARP activities;
 - Evaluating HOME-ARP program results against stated objectives in the HOMEARP allocation plan, and
 - Managing or supervising persons whose primary responsibilities in regard to the HOME-ARP program include assignments described above.

The addition of HOME-ARP rental units, coupled with operating support, will help to ease the burden of housing costs for the city's lowest-income renters who are at high risk of housing instability and homelessness or are currently experiencing homelessness and seeking opportunities for housing stability. Permanent supportive rental housing will help to address the needs of the growing population of people experiencing chronic homelessness or people with disabilities who need supportive services coupled with affordable housing.

Some nonprofit partners have capacity to develop, manage and deliver shelter and rental units, yet struggle to secure the operating funds necessary to ensure consistency in operations. Nonprofit partners will benefit from operating expense assistance to support their efforts to develop appropriate shelter, and housing.

Production Housing Goals

The City's Division of Housing and Community Development (DHCD) has completed a needs assessment for the 2023 – 2028 Consolidated Plan (CON PLAN). Table 43 in the current CON PLAN highlights the vacant and abandoned properties suitable to acquire and convert. Philadelphians who responded to the HOME-ARP community survey, as noted, prioritized the allocation of funding to the rehabilitation of vacant, blighted units for occupancy by homeless households.

	Suitable for Rehabilitation	Not Suitable for Rehabilitation	Total
Vacant Units	8,325	2,710	11,035
Abandoned Vacant Units	7,566	2,670	10,236
REO Properties	NA	NA	13,594
Abandoned REO Properties	NA	NA	NA
Data Sources: 2017 Local Data: A combination of datasets across multiple City agencies was used. This includes a vacancy model that looks at numerous indicators, residential properties that the City's Department of Licenses and Inspections has deemed unsafe and imminently dangerous, and residential properties evaluated by the City's Office of Property Assessment that are sealed/structurally compromised and open to water.			

Table 44

Based on the assessment in Table 43, our housing production goal is to increase the affordable housing stock in Philadelphia by 10% to address the significant gaps. This will also satisfy the community consultation respondents want to develop affordable housing stock to address each of the qualifying populations. We estimate that the total number of HOME-ARP affordable rental housing units that will be developed is 351 over a 72-month time period.

In addition, the City estimates that an additional 200 units of housing can be assisted through tenant-based rental assistance (TBRA), for a total housing production goal of up to 551 total units.

Although the Philadelphia CoC has increased the supply of permanent housing, there is still a significant need for affordable housing both with and without supportive services. The current estimated need within the current homeless services system is 475 units for households with children and 3,402 units for households without children aged 18 and over.

Affordable rental housing production goal: Achievability to addressing priority needs

Philadelphia proposes to meet this goal by soliciting proposals for projects from the large and diverse network of experienced developers and non-profit service providers. Criteria for selection, as noted above, will be: project readiness to proceed; leveraging; targeting, but not limited to households at or below 30% AMI; meaningful, representative opportunities for Minority, Woman, Disadvantaged, and Disabled Owned Businesses (M/W/DSBE) in accordance with the City's Economic Opportunity Plans requirements; and accessibility to people with disabilities. The proposed housing production goals are estimates, given that the amount of leveraging is unknown.

To address the priority needs of Philadelphia, we are looking to serve a wide variety of vulnerable populations with projects for youth, older adults, families and individuals by contracting with experienced providers with a priority on the acquisition and development of existing structures wherever feasible. As the PJ we will also focus on marginalized community population such as, but not limited, to Latin(x)(a)(o), BIPOC and immigrant/refugee within the CoC. We will also look to partners to leverage resources to support successful stabilization of housing for participants.

Preferences

Philadelphia's HOME ARP will use expanded coordinated entry to serve participants from all four QPs. A preference permits a qualified individual to be assessed for HOME-ARP assistance before another eligible applicant who does not qualify for a preference.

The City's will prioritize Q1, followed by Q3 followed, then Q2 and Q4 for 1) the acquisition and development of affordable rental housing units followed by 2) tenant-based rental assistance (TBRA), 3) supportive services, and 4) acquisition and development of non-congregate shelters. HOME ARP funds will allow for the development of approximately 351 affordable rental housing units to, which will help address the gap of 475 units for households with children and 3,402 units for households without children. TBRA will help address the gap of 1,998 households at-risk of homelessness. Supportive Services will help address the service needs and gaps of all 4 QPs. In addition, acquisition and development of non-congregate shelters will help expand services and housing options to address the QP-3 Domestic violence, dating violence, sexual assault, stalking, or human trafficking gap of 1,177 households. Finally, the services and non-profit capacity building to serve QP-4 Other populations, approximately 36,445 households.

Our community will serve all 4 QPs for referrals to the HOME-ARP funded projects and activities through a HOME ARP expanded coordinated entry version of our system, which complies with all applicable nondiscrimination and equal opportunity laws and requirements. Our method of prioritization within each preferred QP will then be determined by chronicity, length of time homelessness and vulnerability for admission before other QP applicants.

Philadelphia will not apply preferences among subpopulations within the QPs for any of the eligible housing units.

Method of Prioritization

Based on our consultation efforts and community needs and gaps analysis inclusive of community feedback, we will establish reasonable preferences by implementing projects that target assistance to certain QPs. We will preference QP-1 and QP-3 followed by QP-2 and QP-4 (*see community feedback analysis on page 9 of this plan*) in a thoughtful and strategic manner for HOME ARP eligible activities through a HOME ARP expanded coordinated entry version of our system to serve all 4 HOME-ARP QPs.

Philadelphia will apply prioritization for each household upon completion of a housing assessment to ensure we address the specific needs and challenges faced by QPs, as we proactively identify their housing needs, and supportive services to assist them to reach housing stability. All the while, we will make sure preferences comply with all applicable fair housing, civil rights, and nondiscrimination requirements, (e.g., Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and Americans with Disabilities Act).

In addition, we will give preference to project selection processes (e.g., RFP, NOFO, etc.) that will apply a preference in the award of funds. For example, rank projects higher or award bonus points for serving a certain QP.

We will also give preference to referral methods that prioritize QPs based on our community's preferred QP order (QP-1 and QP-3 followed by QP-2 and QP-4) and give preference to projects and activities that target assistance to our preferred QP order (QP-1 and QP-3 followed by QP-2 and QP-4).

Our method of prioritization within each preferred QP will then be determined by chronicity, length of time homelessness and vulnerability for admission before other QP applicants.

Acquisition and Development of Affordable Rental Housing Units

This eligible activity will allow us to produce more affordable rental housing (351 units) to help address the unmet needs in our community and minimize the hardships associated with homelessness and being at risk of homelessness. Expanding our housing stock allows us to help people off the streets and out of shelter swiftly, while offering supportive services to prevent recidivism. For this eligible activity, households falling under QP-1 then QP-3 followed by QP-2 then QP-4 will be prioritized.

QP-1 households meet the definition of homelessness as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#)).

Our community's focus is to prioritize assisting QP-1. Thus, we will permit this eligible QP to qualify for preference to be selected for HOME-ARP assistance before another eligible QP applicant that does not qualify for this preference.

HOME ARP will allow us to expand our affordable housing stock and allow us to offer more timely and comprehensive supportive services and affordable housing rental units for this population, ensuring that they can transition out of homelessness and achieve sustainable housing. In addition, by preferencing QP-1 for affordable housing rental units, we can break the cycle of homelessness one household at a time while minimizing the ripple effect of homelessness throughout the community and its impact on the availability of healthcare resources, crime and safety, the workforce, and the use of tax dollars. This activity will also help with cost savings and ultimately allow these households to be contributing members of the community.

QP-3 are households fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. Households fleeing situations such as domestic violence, sex trafficking, and human trafficking require specialized support and relocation services. By preferencing QP-3 for affordable housing rental units, we can address the unique challenges faced by these households and provide them the necessary assistance to help secure safe and stable housing.

QP-2 are households that are at risk of homelessness as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11360\(1\)](#)). These households have income below 30 percent of median income for the geographic area; insufficient resources immediately available to attain housing stability; and have either moved frequently because of economic reasons; are living in the home of another because of economic hardship; been notified that their right to occupy their current housing or living situation will be terminated; live in a hotel or motel or severely overcrowded housing; exiting an institution; or otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness. By preferencing QP-2 for affordable housing rental units, we can address the unique challenges faced by these households and provide them the necessary assistance to help secure safe and stable housing.

QP-4 are other population households who providing supportive services or assistance under section 212(a) of the Act ([42 U.S.C. 12742\(a\)](#)) will prevent the family's homelessness or will serve those with the greatest risk of housing instability. These households have previously been qualified as "homeless" or currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and need additional housing assistance or supportive services to avoid a return to homelessness.

Those households with the greatest risk of housing instability have an annual income \leq 30% of area median income and experiencing severe cost burdens (i.e., is paying more than 50% of monthly household income toward housing costs); or have an annual income \leq 50% of area median income and meet one of the conditions in the "At risk of homelessness" definition.

QP-4 needs support to prevent their entry into homelessness. Without supports they are at a higher risk which can lead to a host of other issues. Addressing their housing needs promptly ensures that these households maintain stability in their community while leveraging supportive services that can help them avoid future hardships in our community.

Tenant-Based Rental Assistance (TBRA)

The TBRA eligible activity will allow us to house homeless households, prevent and maintain households from experiencing homelessness (estimated 200 households). This activity will allow us to address the unmet needs in our community and minimize the hardships homeless and at risk of homelessness households face. This also allows us to help people off the streets and out of shelter swiftly and prevent recidivism. For this eligible activity, QP-1 then QP-3 followed by QP-2 then QP-4 households will be prioritized.

QP-1- These households meet the definition of homelessness as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#)), and the program's focus will offer timely and comprehensive support and provide a safety net for this vulnerable population, ensuring that they can transition out of homelessness and achieve sustainable housing.

QP-3 – These households are fleeing situations such as domestic violence, sex trafficking, and human trafficking. This population requires specialized supports and relocation services. By preferencing QP-3, the TBRA program acknowledges the unique challenges faced by these individuals and families and aims to provide the necessary assistance to help them secure safe and stable housing.

Q-2 - These households are at imminent risk of homelessness. This program aims to intervene swiftly, offering support to prevent their entry into the shelter system. This approach recognizes the critical importance of early intervention in maintaining stable living conditions and avoiding the hardships associated with homelessness.

QP-4 encompasses other populations who may not currently meet the criteria for imminent risk of homelessness but could potentially face such risks in the near future. By extending TBRA assistance to this group, the program takes a proactive approach to prevent their potential entry into the shelter system. Addressing their housing needs promptly ensures that these individuals and families can maintain stability and avoid future hardships.

By implementing this preference order, Philadelphia's TBRA program seeks to address the diverse needs of different qualifying populations, promote housing stability, and ultimately contribute to the well-being and resilience of the community.

Supportive Services

Philadelphia's supportive services projects are designed to offer services to all four qualifying populations (QPs) eligible to apply for and be referred to HOME ARP projects and activities. Preference will be given to QP-1, QP-3, QP-2 followed by QP-4. This preference order ensures that services are allocated efficiently and effectively to the QPs most vulnerable to, and exiting from, homelessness and to address the varying needs of the different populations.

QP-1 - these households have significant needs. By prioritizing QP-1 for services, we can ensure continuity of care and ongoing support for those experiencing homelessness as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#)), building upon the existing services they are already receiving or connect them to ensure stability.

QP-3 encompasses families and individuals fleeing domestic violence (DV). Recognizing the urgent need for comprehensive support, the projects preference this population for specialized services. By offering tailored assistance, including counseling, safety planning, and referrals to community resources, the projects aim to provide vital support to help them transition out of DV situations and rebuild their lives.

QP-2 consists of individuals and families who are at risk of homelessness but are not currently residing in the shelter system. Recognizing the importance of early intervention, these individuals and families will be given preference access to supportive services. By providing them with necessary resources and support, the projects aim to prevent their entry into the shelter system and maintain their housing stability.

QP-4 represents other populations who are not currently connected to supportive services. These individuals and families may face various challenges and barriers that hinder their access to necessary assistance. By targeting QP-4, the supportive services projects aim to bridge the gap and ensure that these populations receive the support they need to address their specific needs and enhance their overall well-being.

By adhering to this preference order, Philadelphia's supportive services projects aim to maximize the impact of available resources, targeting those in most need while ensuring a comprehensive and tailored approach to addressing the diverse needs of each qualifying population.

Acquisition and Development of Non-Congregate Shelter

Philadelphia's non-congregate shelter projects will preference qualifying populations (QPs) in the following manner: QP 1, QP 3, QP 2, and QP 4. This strategic order ensures that the most urgent needs are addressed first and progressively moves towards populations with lower immediate shelter requirements.

The primary preference, QP 1, is dedicated to households who are currently experiencing homelessness as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#)). By placing them first, the non-congregate shelter projects aim to swiftly provide immediate relief and support to this vulnerable population.

Next, QP 3, pertains to households facing domestic violence (DV) situations. Acknowledging the unique challenges and safety concerns they encounter the non-congregate shelter projects allocate resources to cater to their specific needs. This preference aims to provide a supportive and secure environment for these individuals and families, enabling them to escape DV situations and find stability.

Followed by QP 2, encompasses households who are at imminent risk of losing their housing. Recognizing the pressing nature of their situation, they will be given the subsequent preference for non-congregate shelters. By doing so, the projects aim to intervene proactively, preventing their entry into homelessness and ensuring they have a safe and stable living environment.

Finally, QP 4 represents other populations that are less likely to require immediate shelter. These populations may have more stable housing arrangements or face fewer immediate housing risks. Consequently, they will be addressed last in the non-congregate shelter projects, allowing resources to be efficiently allocated to populations with more urgent needs.

By implementing this preference order, Philadelphia's non-congregate shelter projects ensure that limited resources are allocated effectively, targeting those with the most immediate and critical shelter needs while progressively addressing the needs of other qualifying populations.

Limitations

No limitations will be applied to HOME ARP eligibility activities.

Statement of Commitment to Fair Housing

OHS will comply with all applicable Fair Housing and nondiscrimination laws and requirements listed in 24 CFR 5.105(a) when referring participants to HOME-ARP services. In addition, all HOME-ARP funded partners will 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 the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of the Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable

Appendices

Appendix A: Consultation

Appendix B: Community Survey Results

Appendix C: HOME-ARP Public Comment Responses

Appendix D: HOME-ARP Public Comment – Proof of Publications-Notices

Appendix E: HOME-ARP Public Comment Responses Received at 6/9/2022

Appendix A – Consultation

Consultation	Agency/Org Consulted	Type of Agency/Org	Qualifying Population(s) Served	Method of Consultation	Feedback
1.	PHA	Philadelphia Housing Authority	QP – 1 QP – 3 QP – 4	Virtual Meetings, phone calls and a survey	Rent increase concerns, many landlords will increase rent after 1 st year of occupancy; Low income housing needed; Less waiting on the wait list and quicker process; more collaboration around mobility of vouchers and payment standards; provide prompt responses and feedback; Shared housing for large families and couples; Children aging out of foster care; Housing for returning citizens with a focus on family reunification, jobs, housing and financial literacy; Eviction prevention; Right to Counsel; Homeownership; Converting vacant units (Quads) for youth, couples, singles, families
2.	Division of Housing and Community Development (DHCD)	Division of Housing and Community Development	QP – 1 QP – 2 QP – 3 QP – 4	Virtual Meetings and Phone calls	Help finding and maintaining affordable housing; encourage developers to build more affordable housing in underserved communities; more incentives for developers to construct affordable housing
3.	Roadmap to Homes (RtH) Board	Continuum of Care Board	QP – 1 QP – 2 QP – 3 QP – 4	Virtual Meetings and Phone calls	Expand Homeless Housing Inventory with a housing first approach throughout the City.
4.	Department of Human Services (DHS)	Public Child Welfare agency	QP – 1 QP – 2 QP – 3 QP – 4	Phone calls, Virtual Meetings, and Survey	Affordable housing and housing for large families; More funding for move in costs, title assistance, credit check assistance, more flexibility; Livable wages/income to support a family and housing costs; More youth housing and supports for kids aging out of foster care
5.	Mayor's Office for Children and Families	Promote safe families, schools, and communities	QP – 1 QP – 2 QP – 3	Phone calls and Virtual Meetings	Importance of childcare and helping people get back to work; Doing more to help the working class who are struggling or at risk; Pre-K educator incentives;

			QP – 4		Childcare services for family supports; Childcare services for provider supports
6.	Philadelphia Corporation for the Aging	Area Agency on Aging; Community, Management and Protection Agency	QP – 1 QP – 2 QP – 3 QP – 4	Emails and Phone calls	Housing for seniors especially because of COVID; Supportive services – vaccination assistance; Assistance applying for rental assistance
7.	Roadmap to Homes, Service Provider Commission	CoC Committee	QP – 1 QP – 2 QP – 3 QP – 4	Virtual Meetings	More sufficient, quality housing available for homeless; Convert TH to affordable housing; Workforce development support; Enhance the provider workforce with more multilingual and multicultural staff
8.	Veterans Multi-Service Center	Serving the Veterans Population	QP – 1 QP – 2 QP – 3 QP – 4	Survey	Senior living, assisted living, temporary emergency housing, non-congregate housing are some unmet needs; Have clinical services for substance abuse and mental health; Expansion of services; 24-hour crisis intervention teams; Better coordination between housing referrals and housing providers; Support services when placed in housing; Case Management and support after housing; Additional funds for healthcare to prevent delayed care; provide stable, affordable housing
9.	UESF	Nonprofit providing utility and emergency assistance	QP – 1 QP – 2 QP – 3 QP – 4	Survey	Affordable housing, long term housing, fixed income housing; Clean and safe housing units; Assistance with appliances; Increasing resources for housing support to improve housing stability; rental housing options for parents 18-24; locating landlords that provide affordable housing options; Working with agencies that provide services to low and moderate income people; Homebuyer programs: offer TBRA assistance to a tenant who has been identified as a potential low-income homebuyer under a lease-purchase program until the purchase is completed. TBRA is used for monthly rental and/or utility expenses.
10.	Fresh Start	Nonprofit - Supporting to assist	QP – 1 QP – 2	Email and phone	The mission of Fresh Start is to assist chemically dependent, mentally ill, and/ or homeless individuals in

		chemically dependent, mentally ill, and/ or homeless individuals in gaining the treatment and supports	QP – 3 QP – 4		gaining the treatment and supports necessary to lead a healthy and productive life. Fresh Start will offer supportive housing and case management Funds that will help reduce the backlog of hearing requests and receiving compensation; making sure it is equitable throughout the entire city; doing better for all people
11.	Office of Veteran Affairs	Public agency that provides Compensation and Health Services, Educational Assistance to veterans	QP – 1 QP – 2 QP – 3 QP – 4	Survey and Virtual Meeting	Debt forgiveness related to VA health care costs, retraining assistance for unemployed veterans
12.	Philadelphia VA Medical Center	Public agency that provides Healthcare services provider	QP – 1 QP – 2 QP – 3 QP – 4	Virtual Meeting	Funds to reimburse veterans and ensure access to care for those who have more complex health care needs as a result of the pandemic
13.	Office of Domestic Violence Strategies	Part of City Government providing leadership and coordination to network of providers dedicated to Ending Domestic Violence	QP – 3 QP – 4	Phone Call, Virtual Meeting and Survey	Affordable, permanent housing for survivors of DV; Low barrier shelter and treatment for individuals for SUDs/ODDs; Affordable childcare; Trauma-informed counseling for adults and children; Empowerment case management for DV survivors; Not enough housing for vulnerable populations; address domestic violence by providing funding, oversight, training, technical assistance and guidance to emergency shelters, crisis hotlines, prevention programs; expand DV services to families who may find themselves in need during and after COVID; develop resources and services to protect family members and prevent violence; improve staff training and link programs in the health, behavioral health, self-sufficiency, child welfare, criminal justice, law enforcement and social service systems for effective treatment and prevention of domestic violence

14.	Methodist Services	Nonprofit social service provider	QP – 1 QP – 2 QP – 3 QP – 4	Survey	Supportive Services; Additional funds for rental insecurity and assistance with utilities
15.	Office of Re-entry Partnerships	City governmental office that leads and coordinated assisting returning residents and interrupting cycles of harm while building communities	QP – 1 QP – 2 QP – 3 QP – 4	Phone Calls, Virtual Meetings	Not enough supports and housing resourced difficult to find in the city; waiting for housing is atrocious; help homeless people find livable income; create programs that help the working class; Provide TBRA to low-income persons attending job training
16.	Roadmap to Homes, Racial Equity Committee	CoC Committee	QP – 1 QP – 2 QP – 3 QP – 4	Stakeholder Session, Phone Calls and Virtual Meeting	Making the homeless system accessible for all. Creating a multilingual marketing plan and ensuring a multicultural staffing structure. Capacity building of minority providers, businesses and BIPOC Landlords.
17.	Roadmap to Homes, HUD Alignment Committee	CoC Committee to ensure best use of available federal dollars	QP – 1 QP – 2 QP – 3 QP – 4	Stakeholder Session, Phone Calls and Virtual Meeting	Increase affordable housing that complements other funding sources.
18.	Youth Adult Leadership Committee	CoC Committee	QP – 1 QP – 2 QP – 3 QP – 4	Stakeholder Session, Virtual Meetings and Survey	Increase Youth (especially foster care and LGBTQ+) Housing, Life Skills and employment resources
19.	Juvenile Law Center	Legal Services	QP – 1 QP – 2 QP – 3 QP – 4	Survey	There is a lack of independent living for foster youth aging out of care. Long waiting lists for shelters and supportive housing programs. Rental assistance programs; Lack of community centers and programs for sports, trades, and life skills; Collaboration with Valley Youth House, Philadelphia ombudsperson; Offering legal assistance; Right to Counsel; Legal resources and supports; Assistance with Community HealthChoices (CHC); Home and Community-Based Services (HCBS), also known as Waiver programs; and Dual Eligibility (the term for people who have both Medicare and Medicaid insurance.); Assistance with

					Medicaid services and housing; Assisting with child custody and child support cases; Protection from abuse; Representing clients regarding Landlord-Tenant issues and access to healthcare; Creating simple or living wills and Power of Attorney for the disabled; Providing counsel and referrals on Social Security, Housing and Disability/ADA matters
20.	The Mayor's Commission on People with Disabilities (MCPD)	City governmental entity working to make sure Philadelphians with disabilities are included in all facets of the community	QP - 1 QP - 2 QP - 3 QP - 4	Email and phone	Referral services and resources to residents with disabilities; construction and housing modifications for those who are disabled
21.	NAACP Philadelphia Chapter	Nonprofit Civil Rights	QP - 1 QP - 2 QP - 3 QP - 4	Email and phone	Eliminate discrimination, prejudice and disparities in the housing market and end residential segregation. Seek enactment and enforcement of federal, state, and local laws securing civil rights. Seek elimination of the adverse effects of racial discrimination in housing; receive and address complaints of discrimination in housing; oppose all restrictive practices whether public or private
22.	Johnson House Historic Site, Inc.	Center for Social Advocacy and civil rights through education and preserving historical sites and stops on the Underground Railroad	QP - 1 QP - 2 QP - 3 QP - 4	Survey	Funding for families living in homes with tangled titles, HIV positive/affected families who head households, women with families in domestic, abusive relationships, Veterans experiencing social isolation and insecurity; Need supportive services for housing insecurity, marginalized education and those with high poverty levels; More collaborations with houses of worship, neighborhood-based CBOs and RCOs, public schools and health centers
23.	Center for Advocacy of the Rights and	Nonprofit Civil Rights organization advocating for the elderly	QP - 1 QP - 2 QP - 3 QP - 4	Survey	Funding for housing counselors; Specialized homeless shelters for older adults and adults with disabilities that would support home and community based services; Shelters to accommodate adults with household pets or

	Interests of the Elderly (CARIE)				<p>an increase in shelter services to address this gap and offer this with proof of pet vaccinations - veterinary services could be bundled with these emergency housing services; Need for domestic violence shelters to be able to provide for older adult survivors through accessibility and supportive services; Increase in low-income housing that is inclusive of multi-generational households, as many older adults have caregivers or young children living with them that risk losing their place of living if the older adult lost their home or transitioned to an emergency shelter. Current policies and projects are not family-inclusive and need a broader perspective on family beyond the spouse to include grandparents who care for their grandchildren, etc. There are not enough subsidized options or properties to meet the current demand.</p>
24.	Philadelphia Homes for Youth (PH4Y)	Advocacy Coalition working to end youth homelessness	<p>QP - 1 QP - 2 QP - 3 QP - 4</p>	Email, Phone Calls	<p>Requests from PH4Y for HOME-ARP funds allocation:</p> <ul style="list-style-type: none"> -Allocate at least 20% of the ARP funds for targeted programming and supports for transition-aged young people who are homeless, at risk of homelessness, and are at the greatest risk of housing instability -Include specific activities in the HOME-ARP RFP(s) that have been identified by the Coalition as high need and effective practices such as: 1. Development of a Specific Program for Recruitment, Retention, and Support of Landlords Willing to Rent to Transition-Aged Youth, 2. Additional Youth Navigators and 1 Supervisor for them, 3. Provision for Rental Assistance and Costs related to acquiring and maintaining housing for Transition-age Youth (TAY), 4. Flexible funds for Prevention services and Supportive services critical to housing security such as TAY case management and childcare, 5. Programming to support Special Populations at greatest risk of housing instability

					including expectant and parenting young people, LGBTQ+ young people, behavioral health needs for young people, and young people experiencing child welfare, juvenile justice system and immigration challenges, 6. Acquisition of Permanent Affordable Housing for TAY and include TAY in any general projects in the RFP to be included for a targeted approach.
25.	Philadelphia Department of Public Health	Public Health Organization, Government	QP – 1 QP – 2 QP – 3 QP – 4	Survey	The Philadelphia Department of Public is responsible for public health of city residents, protecting and promoting the health of all Philadelphians; telemedicine supports; assist with accessibility of health services to those receiving housing services
26.	Department of Behavioral Health and Intellectual Disabilities (DBHIDS)	Behavioral Health Organization, Government	QP – 1 QP – 2 QP – 3 QP – 4	Survey	The Department of Behavioral Health and Intellectual Disabilities (DBHIDS) is the governmental entity that funds, coordinated and oversees all behavioral health services for Medicaid members; behavioral health and telemedicine supports
27.	Women In Transition	Nonprofit, service provider advocating, counseling women	QP – 3	Survey	Emergency housing for survivors of domestic violence; Human trafficking, and sexual assault; Affordable long-term housing; Clients need help with saving, budgeting, landlord tenant issues, childcare
28.	Turning Points for Children	Service provider for young adults through the child welfare system		Survey	More landlord partnership to help the landlords understand the community of people served in various programs. We have noticed that many landlords are not willing to work with 3rd parties, but once they understand the LifeSet program better, they are happy to assist; Affordable housing and more rental to own options; Mother and children specific rentals; Progressive housing options, where participants can graduate from studio to one bedroom with short-term leases and guided steps to independent living; Educational support such as housing workshops programs to teach the foundation of living independently are very important. Topics such as

					renters' rights, utility needs and access, budgeting, how to stock a kitchen and communication with landlords are all needed; Intense case management for the first few months to help support the youth as the young person steps into this new role living alone and help navigate major decisions that will affect them forever; Domestic violence awareness and training on what to do when you are a victim.
29.	Public Health Management Corporation PHMC	Nonprofit, multi-service provider	QP – 1 QP – 2 QP – 3 QP – 4	Survey	More affordable, permanent housing; Continuity of supportive services
30.	HELP, USA	Nonprofit, housing service provider	QP – 1 QP – 2 QP – 3 QP – 4	Survey	Housing preservation: Services for at risk tenants and people living doubled up; Upstream services in all regard: 1. Prison/jail to shelter pipeline 2. Financial assistance to prevent evictions 3. Assistance to support families/individuals post-homeless 4. More shelter capacity
31.	Women Against Abuse	Nonprofit working to end domestic violence; provides services to victim/survivors of partner abuse	QP – 3	Survey	Affordable housing for DV; Safe housing with a reputable landlord; meets HQS; Childcare services and supports; Other supportive services – healthcare (mental and physical), drug and alcohol, access to DV resources; Collaborations with childcare providers, school district, violence prevention/trauma support programs, CLS, immigrant serving communities, PHA, DBH
32.	People's Emergency Center (PEC)	Nonprofit, social services and homeless provider	QP – 1 QP – 2 QP – 3 QP – 4	Survey	Homeless families have trouble accessing services; Hire a navigator role to connect families to housing supports; Bridge between childcare/Head Start with rental assistance and eviction prevention services
33.	Pathways to Housing, PA	Homeless services Provider	QP – 1 QP – 2 QP – 3	Survey	More Housing First units with appropriate services for folks who need low barrier entry.

			QP – 4		<p>Efficiency units in a building with staffing for vulnerable people and people who need a barrier between their housing and the dealers/pimps/etc. on the streets.</p> <p>Reimagining better SROs with their own bathrooms. We need the volume that an SRO can offer, but we also need a place that feels safe for folks with trauma, trans folks, etc.</p> <p>One coordinating body focused on behavioral health and housing people with behavioral health needs brought in a lot of federal dollars and helped to build our current system of care. We need a similar position working collaboratively with OHS and DBH leveraging dollars for us; More intensive wraparound services; intensive case management for mental illness services; supportive services for all; Connect the CoC to all service providers and government departments; Affordable housing (access and quantity)</p>
34.	Families Forward Philadelphia	Nonprofit, Social Service provider offering housing, supports, and hope	<p>QP – 1</p> <p>QP – 2</p> <p>QP – 3</p> <p>QP – 4</p>	Survey	Supportive services for all; Connect the CoC to all service providers and government departments; Affordable housing (access and quantity)
35.	Lutheran Settlement House	Social services, domestic violence, and homeless service provider	<p>QP – 1</p> <p>QP – 2</p> <p>QP – 3</p> <p>QP – 4</p>	Survey	Need for rapid and transitional housing services, trauma informed services; supportive services for street homelessness and drug addicted persons; services for those in danger of losing housing
36.	HIAS PA	Nonprofit that supports low-income immigrants with legal and social services	<p>QP – 1</p> <p>QP – 2</p> <p>QP – 3</p> <p>QP – 4</p>	Survey	More low-income, affordable, stable, long-term housing across the board. This includes affordable long-term housing for people experiencing homelessness, domestic violence victims and survivors, low-income people with disabilities, returning citizens and those with a prior criminal record, Black and brown trans people who are low income, and undocumented people; Funding for long term, stable psychology, and psychiatry services for low-income people; Assistance securing and finding housing

37.	The Salvation Army	Multiservice nonprofit, service, and homeless provider	QP – 1 QP – 2 QP – 3 QP – 4	Survey	Development and support for affordable housing; Emergency shelter for survivors of trafficking and DV, landlords willing to rent to those with rental assistance; Emphasize long-term treatments for mental health and addiction issues; Invest in affordable housing; Preserve low-cost units from falling into despair; Mobile case management for DV and HT; Vocational training; Flexible dollars to support those meeting their biological, psychological, and social needs
38.	COMHAR	Nonprofit, mental health service provider	QP – 1 QP – 2 QP – 3 QP – 4	Survey	Outreach and supportive services to link individuals who are homeless with opiate addiction with treatment and housing; Services for individuals who are homeless in the Kensington Area. Most of these individuals use opiates; Care coordination, linkages with clinical, psychiatric rehabilitation, and case management services, peer support, coordination with FQHC's
39.	Project HOME	Service provider working to end homelessness in Philadelphia by mobilizing congregational volunteers and community resources	QP – 1 QP – 2 QP – 3 QP – 4	Survey	More housing for: Recovery-supported community-building-focused - addiction-related deaths are at an all-time high, so the time is NOW for this to be a priority; Specific housing for LGBTQ youth (the ability to target, defining a program as a program that possibly needs different categorization to comply with letter and spirit of fair housing; homeless-aging needs (which in this case means the fast-growing group of people over 50) with appropriate supports
40.	Philadelphia Interfaith	Service provider working to end homelessness in	QP – 1 QP – 2 QP – 3	Survey	More available, affordable long-term rental units - especially need rentals where landlords are willing to take a risk on folks with poor credit/evictions; available

Hospitality Network (PHN)	Philadelphia by mobilizing congregational volunteers and community resources	QP – 4	<p>affordable short-term rental units for 6 months to 1 year; Funding to strengthen L&I to perform inspections/follow up more readily and create more accountability for landlords to maintain and complete property repairs; More rental units where utilities are carried by the landlord and included at a fixed rate in monthly rent. This is especially true for families/individuals on fixed incomes, More support and affordable housing for seniors on fixed incomes. We are seeing an influx of seniors whose rent is almost doubling and the waiting lists for subsidized senior facilities are currently at several years; Establishing pathways to home ownership among low income populations; We also need more beds in family shelters as a temporary placement when tenants and their families are living in uninhabitable lodgings and for victims and their families; Additional Senior housing services/support; Streamlining of services for tenants to offset the costs of their economic responsibilities, such as utilities, rental support, connection to employment; Knowledge of the current effects of redlining and housing segregation and concrete steps to remediate the long-term impact; Pathways for tenants to use their income and rental status to move towards becoming homeowners; Case management services that address the needs of the entire family; Increased access to Mental Health Services; Education regarding financial literacy and budgeting; Safe residential options for households including persons with disabilities (especially those with children); Temporary housing (non-congregate shelter sites) for households with rental barriers; Shallow rent subsidies for market rate housing; Month to month room rental opportunities at below market rates or with shallow rent subsidies, if needed; Financial literacy, employment coaching and</p>
---------------------------	--	--------	--

					tenants training linked with emergency and homelessness prevention programs; Funding for housing navigators to match landlords with tenants; Conversion of school buildings, convents for safe room rentals with some type of mixed use purpose
41.	Action Wellness	Nonprofit, service provider that assist Philadelphians living with chronic illness and HIV/AIDS	QP – 1 QP – 2 QP – 3 QP – 4	Survey	Affordability: Rents are too high in most areas. Discrimination: Some properties charge families an annual fee if they have children. Accountability: For Owners who don't make repairs to their rental properties (aid/incentives). Funding for programs in addition to PHA to obtain landlord incentives; More funds for staffing and training - need skills in Drug & Alcohol, Mental Illness, and de-escalation; Need more funding for safety and security
42.	Mission First Housing Group/1260 Housing	Full service real estate organization that develops and manages multi-family, affordable rental housing for individuals and families in need; develops high-quality, green community assets across the Mid-Atlantic region	QP – 1 QP – 2 QP – 3 QP – 4	Survey	Increasing gap financing limits by 50% or (better) 100%; Multiyear reductions in HUD programs (such as SHP) have limited the ability of developers to build and preserve affordable housing serving homeless individuals and other special needs populations. Creating a source of long-term funding for services would help address this gap; Funds could be used to create a flexible pool of patient capital that would enable a pre-screened group of affordable housing developer/owners to offer a competitive price for multifamily properties at risk of conversion to market; Staffing, training, and a return to incentive-based service for accountability. Services cannot be optional; they are essential to building stability and longevity in housing. Sobriety, mental health, and health compliance cannot be optional. Supportive Services needs to be more dynamic and direct; Include owners with funding needs and incentives to continue to provide affordable housing.

43.	Valley Youth House	Nonprofit, Service Provider for Youths	QP – 1 QP – 2 QP – 3 QP – 4	Survey, Phone Calls	Additional non-congregate emergency housing options for youth 18-24; Youth remain shelter averse and would benefit more from an RHY/TLP type model where they maintain individual lockable space with shared common areas and support services within the space but not the traditional shelter structure; Landlord support and incentivizing; Connection and resources for employment opportunities
44.	SEAMMAAC	Nonprofit, supports and serve immigrants and refugees and other politically, socially, and economically marginalized communities as they seek to advance the condition of their lives in the United States.	QP – 1 QP – 2 QP – 3 QP – 4	Survey	Revitalize vacant properties for low-income housing; more permanent supportive housing; Provide homeless youth and reoccurring homeless adults with supportive housing and mental health services; Collaborations with immigrant and refugee organizations, churches and schools; Affordable and safe housing close to public transportation and schools; Interpretation services for CBOs helping clients with housing needs; housing and supportive services for immigrants, refugees, DV survivors and clients with mental and intellectual disabilities and seniors

Appendix B: Community Survey Results

Acquisition & development of non-congregate shelter units

Subpopulations:

- Those with mental illnesses or addiction/substance use (with in-building clinical care, rehab/ recovery support, and life skill training)
- Veterans
- Reentering population
- Seniors
- Those with disabilities
- **Convert shelters** to non-congregate shelters and SROs that are accessible
 - Renovate shelters into spaces with individual beds/areas for belongings.
- **Renovate vacant city-owned, PHA-owned, and private properties into housing**
 - Consider vacant:
 - Schools
 - Churches/mosques/sacred spaces
 - Offices and factories
 - Hospitals
 - Motels/hotels
 - Blighted rowhomes
 - Low-income houses
 - Include green space, outdoor benches, supportive services nearby (mental health, medical care, community center).
 - Create an option for community/residents to purchase the home or property. Community should be consulted on purchase option if renovating a building.
- **Develop housing**
 - Tiny homes for homeless individuals

Development & Support of Affordable Housing

- **Subpopulations**
 - Seniors
 - Families/individuals with disabilities
 - Youth
 - DV survivors
 - Gun violence survivors
 - SSI/SSD Recipients
 - Veterans
 - Reentering populations
 - Mental Health/Addiction

- Please allocate funds for housing programs for transition aged young adults between ages 18 and 26.
 - More subsidized housing for single young adults between the ages of 17-25 and single adults.
 - I would like some portion of the ARP funds to be used to prevent and address homelessness of transition aged youth in Philadelphia. Youth coming out of the foster care system experience homelessness at much higher rates.
 - Supporting Homeless queer/Trans people, especially. youth! Acquiring vacant lots for AFFORDABLE housing/community services (gardens/centers/etc.)
- **Vacant Lots/ Abandoned Buildings**
 - I believe all abandoned buildings and houses should be renovated and turned into beautiful and affordable housing for people.
 - Rehab abandoned properties for 5 years or more into affordable housing.
 - Renovate the recently closed Senior facility into transitional housing using a ¼ way, ½ way, ¾ way back to society process to build resilience in those seeking permanent housing.
 - Buy abandoned houses for cheap and acquire assistance from contractors to repair and make livable for families. Provide contracting companies with pay and incentives.
 - Bring back the low-income homebuyers' program and fix up all the unoccupied, run-down homes throughout Philadelphia, and make them available at a very low purchase price.
 - Allow developers to acquire abandoned/vacant city-owned land to develop as long as the developer lives in the community.
 - Convert vacant properties to affordable housing with the goal of whole-people integration: income, culture, street race presentation; accessible/universal design. End structural segregation created by our government.
 - Acquire and convert _____ into affordable housing:
 - Abandoned/city-owned/PHA-owned land and buildings
 - Kirkbride center campus
 - 600 Luzerne
 - Hahnemann Hospital and absentee landlord homes
 - Motels/hotels/hospitals/office spaces
 - Germantown High School and The Old Bud Building
 - New construction of affordable housing, Opportunities Apartments is a pipeline project in Nicetown for 41 units of affordable housing with 8 units of permanent supportive housing for homeless seniors
 - **Contracts/Affordable Housing Acquisition and Development**
 - Consult with architectural firms to sustain and upgrade older spaces for long-term use. You should as well consider transitioning the land of city property back to community-based organizations after 60 or 100 years.

- Give funds to local minority investors to acquire blighted properties to renovate in order to provide affordable housing while restoring pride and self-esteem to the residents of those blighted areas.
- Use the money to leverage financing for large scale development of mixed-use buildings - new construction - in lower income neighborhoods.
- Purchase small already prebuilt houses brand new and install them on vacant land. That way they own land and house, only need to pay utilities and taxes. Put in place supportive services to make sure they are signed up for all programs.
- Partner with R E Developers to create 10- to 12-unit rental apartments, with retail, meeting room and green space. Developers can sell or retain. Must have an established management company. Mixed for a population of veterans, seniors, family. 2 bedrooms, one bedroom and studios.
- Give existing affordable housing providers a subsidy to help low-income tenants maintain their homes.
- Alter the Land Bank formulas/scorecards to make it easier to build on city-owned vacant lots. Explore Community Land Trusts to establish more permanently affordable housing
- Tiny house program
- Renovate transitional housing into affordable housing, extend the length of the Rapid Rehousing program and renovate abandoned homes.
- It should be a law that any new developments must have a percentage of space for low income families. All apartments etc.
- Set the standard and unit mix for renovation and accept Turn-Key units. Set up a rigorous inspection system of all properties at specific phases of completion. Accept new construction if eligible to avoid environmental hazards present in older buildings and schools.
- Not only renovation of transitional housing into affordable housing but the continued development of land currently held in trust by the City to be used to develop affordable housing for purchase and rent.
- What 'shovel-ready' projects are in pipelines of orgs and agencies? Priority of those should be given, especially those with site control.
- Invest in creating more Housing First facilities. Take advantage of this big block of funding to pay for large investments, not to pay for smaller projects/ongoing/overhead.
- Create mixed income affordable housing for incomes of up to \$100k per year. Mixing the income reduces crime and encourages healthy living for the areas.
- Require developers to create affordable housing in their development plans.
- Consider a portion of real estate taxes to support affordable housing so this is sustainable long term. End ten year tax abatements on new construction, 2 years is long enough especially in more affluent neighborhoods.
- Partnering with Managed Care Organizations and graduates from neighborhood JumpStart programs to develop this housing is a holistic, inclusive approach to community development.

- Providing development assistance to Philadelphia vacant landowners to develop low-income housing on their sites. There can be a program for anyone owning, even one parcel of land to develop low-income and handicap accessible housing.
- **Location**
 - Development should begin in all neighborhoods to offer families in need a real opportunity for a better life.
 - Create green low-income spaces for young adults, seniors and domestic partners near in communities such as: East Falls, Roxborough, Wissahickon, etc for people of color.
 - Scattered affordable housing units to help create mixed income communities and avoid gentrification instead of creating new “projects.”
 - Please consider putting more affordable housing in richer neighborhoods. Mixed income neighborhoods benefit everyone. Do not let rich, exclusionary reactionists limit these essential services and infrastructure in rich neighborhoods. People with lower incomes or who are homeless need even more to live near jobs, city services, and opportunities.
 - There are A LOT of abandoned schools, businesses, and spaces available to turn into affordable housing without focusing solely on “blighted” areas for affordable housing. Affordable housing should not be synonymous with “blight/low income
- **Purchasing programs**
 - Help people purchase properties so they have ownership and pride in their home. They need financial counseling and training on how to keep and maintain a home. Let’s work to get them out, or rental properties.
 - Offer first time home buying programs if the residents want to move into another property.
 - Offer first time home buying programs if the residents want to move into another property.
- **Housing Stabilization/Homelessness Prevention**
 - Avoid crises, save houses going into foreclosure keep folks in their homes.
- **Other**
 - The most common issue we face with our homeless population is increase landlord recruitment to accept vouchers.
 - Capital improvements and supplies for transitional housing providers...
 - A watchdog unit to both oversee the distribution of these funds to ensure they are actually being spent and spent on the correct resources. That watchdog unit should also oversee the people that receive these funds to ensure they were honest when applying and that they are deserving and not out working under table etc. just so they can take funds that others truly need.

Time limited tenant-based rental assistance (TBRA)

- At risk of being homeless due to environment and home repairs. Though individual works they do not meet guidelines for assistance and suitable housing because they make just enough to get nothing. Would like to support these members as well.
- Include at least 20% for persons living in tangled titled homes for repairs who do not qualify income wise but are presently paying all taxes and utility bills. Such as myself and other retirees.
- Please consider helping landlords who are already housing low-income individuals, providing a place at low rent to keep them from being homeless.
- The most common issue we face with our homeless population is finding a landlord to accept the PHA Section 8 voucher. We need incentives for landlords so they can accept the vouchers.
- Subsidize rent and increase rental assistance payments.
- Offer new types of incentives to engage landlords.
- No renovations, just rent control to free up housing
- Use funds for down payment assistance and to reduce rent and mortgage costs.

Supportive Services

- **Specific populations**
 - Services for the trans-identifying youth who may be at risk of homelessness.
 - LGBTQ+ focused supported services - trauma-informed; otherwise, the people that seek support are at risk of being re-traumatized while working with homeless services staff who lack trauma awareness, sensitivity, and competence.
 - Youth low barrier 24 hr drop-in center.
 - Recreation facilities for young adults that offer workforce, financial planning.
 - Priority services for seniors. Seniors should receive in-home case management support.
 - Offer services for men and women returning to Philadelphia from incarceration.
 - Individuals with criminal justice involvement as well as those recovering from substance use disorders.
 - Develop affordable housing and programs for parents with disabled children who are unable to work due to child's disabilities.
 - Helping grandparents to be able to get housing with grandchildren that parents leave with them.
 - Also housing opportunities for those on Megan's List who are now up in age and unable to reside in a SNF due to their criminal background and are now on the streets.
 - Offer services for those aging out of foster care.
 - Please provide more support for families and single parents with children. There are not nearly enough safe, long-term options for people with children.
 - The top priority, given the fatalities, should go to recovery-related services and housing. Secondly, the homeless population is ageing - as much as 50% is over age 50 and services for aging and medical vulnerability among people who are homeless are desperately needed. Finally, young adult homelessness is growing

much too rapidly and people who identify as LGBTQ+ comprise as much as 40% of the homeless young adult population and yet we are not serving these folks proportionately.

- **Mental Health**
 - Mental health intervention.
 - Ensure mental resources are easily accessible.
 - Yes, more outreach to the unreachable to provide mental health services and care management.
 - Incorporate mental health/behavioral health teams in all stages of every project.
- **Addiction/Recovery**
 - I work in the addictions field and can say that drug addiction is a large factor that leads to housing instability, so making sure that there are services in place to support recovery would also be a helpful use of funds. I also think that putting funds towards community organizing and mutual aid would be helpful-- communities want to take care of each other and just don't have the resources to support people who are homeless/don't feel safe doing so, but that could change if it became normal and funded to somehow use community care to help address the homelessness problem.
 - The opioid epidemic is a primary driver of homelessness in Philadelphia. We need more treatment beds!
- **Staffing**
 - With the 800+ new vouchers, and the difficulty of finding places that will accept vouchers, especially without access to transportation, computers, or a phone, we will really need housing navigators as part of supportive services.
 - Increased outreach to get the homeless off the streets and into shelters.
- **Physical Health**
 - Teaching low-income residents and near-homeless citizens how to get and stay healthy through low-cost diet and lifestyle behaviors.
 - Allocate some money to medical respite for the homeless who are not able to live in a regular shelter. Many are very fragile living on the streets and elderly.
 - There should be COVID testing and vaccinations administered wherever the homeless are being served.
- **Repairs/safety**
 - Helping people below the income level with home repairs.
 - Addressing housing quality issues, e.g lead/asthma/roof/heating/plumbing, esp for rental units affordable to low-income tenants (in exchange for longer term restrictions on rental cost).
- **Training/Life Skills/Job Placement/Education**

- Help with job placement and expungement, pardons/seal records for people who are homeless and non-homeless.
- With providing homes have a program to filter people into jobs and savings and teach people how to create long term wealth.
- The workforce development piece MUST include criminal record clearing. Rates of individuals with criminal records are even higher among the house less population, and those records contribute directly to their inability to qualify for public housing, and to discrimination by private landlords.
- Supportive services must include literacy and basic adult education to gain sustainable traction toward improved opportunities.
- With financial literacy and job support training those low-income residents will be able to afford housing with a living wage job.
- Allocate funds to educate the participants we serve on the need of self-sufficiency. Starting with younger population.
- Life skills! How to pay bills, checking accounts, couponing, housekeeping, light repairs, Conduct; drug tests, literacy programs, high school diploma/GED programs. Mandatory savings programs.
- Develop and offer a construction training program which includes career track plus internships
- Provide education skills along with housing a work study program. Manage your health, your finances, how to fix and repair your living quarters, how to establish a business, not just providing housing.
- If funds are leftover or could be spared perhaps dedicate those funds toward education and educational needs, such as computers, school ids, courses, study abroad opportunities for 2-to-4-year accredited programs. I know vocational spending is important, but the opportunity to be informed and to challenge the forms is also very important and necessary.
- Increased support dollars in Perm support housing. Intensive intervention teams to assist with supportive housing.

- **Housing Stabilization**

- A portion of the HOME-ARP funds could and should be used to assist in the stabilization of tenants who have not exceeded 18 months, allowing for the remainder to be exhausted or a program which can assist with stability. Additionally, allowing utility costs which aren't paid to PECO be added into the formula as well as creating a system which will ensure tenants reside at a location with proven postal verification and landlords are within city codes to prevent fraud and abuse.
- Provide security deposit and buying home counseling.
- Tenant mediation offered before they get evicted.

- **Other**

- Sometimes there's a language barrier with certain property management agencies or landlords. Maybe come up with a way to fix that?
- DV services and assistance
- We could stretch the dollar more. Utility companies can donate labor costs for installation. Community organizations and neighbors can donate furniture and household goods. Create a system for nearby businesses to hire and train those that live close by. Etc. we don't connect the dots enough. People legitimately need road maps to survive.
- Consider a foster care approach to homelessness. Subsidize community members to take in homeless individuals... provide resources to achieve and maintain stability... also create a fund that provides down-payment assistance for participants that qualify for.
- Pet friendly options.
- Childcare for those seeking to re-enter employment or enter a treatment program
- Services can include prevention assistance, housing counseling, and housing focused case management, life skills.
- Consider partnering with Philly anchors, corporations and workforce organizations to develop a training program and job pipeline. This program should be especially patient and sensitive to the needs of people who have experienced homelessness, keeping in mind that they may miss obligations or need to adjust to the discipline it takes to have a consistent job.

Additional ideas:

- Develop a tracking system to record how providers are using funds and helping the homeless population.
- Fund other Non-profits as resources to help fill the void the city cannot handle.
- Supportive housing without barriers and more intensive services.
- Inventory city properties through the city, providing immediate repairs and fast tracking a program where thousands of our residents can either relocate to decent housing as well as mainstreaming the homeless population who desires change, not to mention developing goals which will help them overcome obstacles which have stymied their positive development.
- The city has a vastly growing number of vacant properties, if a whole community came together to stage a homeless camp in downtown in center city, imagine those efforts from those people, if given a few rundown properties, in a part of town that seems to be forgotten...seems as if there are plenty of people who would like to offer their skills to the younger generation and/or to someone who has none in order to achieve the same goal of ending homelessness. 2. Put together workshops in the city for those looking to run boarding houses, and small temp shelters can apply with the right credentialing.

- Why just in blighted areas? why not wherever the city has space? Please rethink building new ""projects"" into areas that already have hundreds of vacant units and add to the overstretched resources - transportation, utilities etc. of the area. Build in U-City/Fishtown/Center City - Stop with the NIMBY.
- Repeal 10-year abatement.

1) Do you have thoughts or ideas related to the project allocation percentages and dollar amounts?

Public Comment Themes	Suggested Activities	HOME-ARP Funding Category	Accepted or Consideration for Project Review Criteria or Declined	If not added to plan, why?
Youth/Transition-Aged Youth (TAY)	OHS should establish a goal of setting aside 20% of HOME-ARP funds to assist transition-aged youth who are homeless, at risk of homelessness, and are at the greatest risk of housing instability	N/A	Consideration for Project Review Criteria	The City of Philadelphia is not establishing preferences among subpopulations for HOME-ARP projects and activities. Instead, our community will rely on the HOME ARP expanded coordinated entry version of our system to serve all 4 QPs, based upon the assessed community needs detailed in this plan. In addition, our community will comply with all fair housing, civil rights and discrimination requirements.
	Invest in building the capacity of our providers and developers to better serve transition aged youth; this capacity is currently lacking. The lack of investment in this area has resulted in fewer providers serving transition aged youth despite the great need. An increase in building this capacity would have long lasting positive results	Non-profit Capacity Building	Consideration for Project Review Criteria	The City of Philadelphia is not establishing preferences among subpopulations for HOME-ARP projects and activities. Instead, our community will rely on the HOME ARP expanded coordinated entry version of our system to serve all 4 QPs, based upon the assessed community needs detailed in this plan. In addition, our community will comply with all fair housing,

				civil rights and discrimination requirements.
	Award increased points in the scoring of responses to any RFPs that propose to serve transition aged youth	N/A	Accepted	N/A
	Philly Homes 4 Youth Coalition recommends an allocation of at least \$10 million for supportive services for youth and young adults who are homeless or at high risk of homelessness	Supportive Services	Declined	The City of Philadelphia determined that it will allocate 12% for Supportive Services for our entire HOME-ARP allocation.
Non-profit Operating & Capacity Building	Increase Non-profit Operating and Capacity Building to 5% by reducing Administration and Planning costs to 6%	Non-profit Operating and Capacity Building	Declined	The City of Philadelphia will allocate funding for Administrative and Planning to address the compliance activities that will ensure monitoring, implementation and reporting requirements of the HOME-ARP funding activity.
	Increase the percentage allocated to non-profit capacity building from 3% to 13%.	Non-profit Capacity Building	Declined	The maximum a community is allowed for non-profit Capacity Building is up to 5% of the HOME-ARP allocation.
Affordable Housing	Resources are needed to preserve affordable units, including expiring tax credits, renovations of older units, other projects reaching end of affordability mandate	Acquisition and Development of Affordable Rental Housing	Accepted	N/A
Shelter beds	Development of affordable housing should be coupled with increase in shelter beds, because there will otherwise be a bottle-neck (with not enough exits to housing to allow for unsheltered to move into shelter.	Acquisition and Development of Affordable Rental Housing	Declined	Congregate shelter is not an allowable activity under HOME-ARP.
	Conversion of congregate beds to non-congregate will reduce the overall shelter	Acquisition and Development of	Accepted	N/A

	capacity which is contradictory to the needs displayed in the Gaps Analysis.	Non-Congregate Shelters		
Accessible Housing	Increase accessible housing for individuals with disabilities	Acquisition and Development of Affordable Rental Housing	Accepted	N/A
	Additional funding for rental assistance is needed	Tenant-Based Rental Assistance	Accepted	N/A
	Priorities should be TBRA for vacant units and outreach to get the hoards of mentally ill homeless persons out of places not meant for habitation. Like SEPTA stations and public park encampments (Franklin institute area).	Acquisition and Development of Affordable Rental Housing & Tenant-Based Rental Assistance	Accepted	N/A
Other	Seek specific goals around equity related housing issues for Black and Latinx folks, young people, and LGBTQ+ folks.	N/A	Consideration for Project Review Criteria	The City of Philadelphia is not establishing preferences among subpopulations for HOME-ARP projects and activities. Instead, our community will rely on the HOME ARP expanded coordinated entry version of our system to serve all 4 QPs, based upon the assessed community needs detailed in this plan. In addition, our community will comply with all fair housing, civil rights and discrimination requirements.

2) Do you have thoughts or ideas related to the range of activities our community could undertake? (See page 22 of the allocation plan to reference)

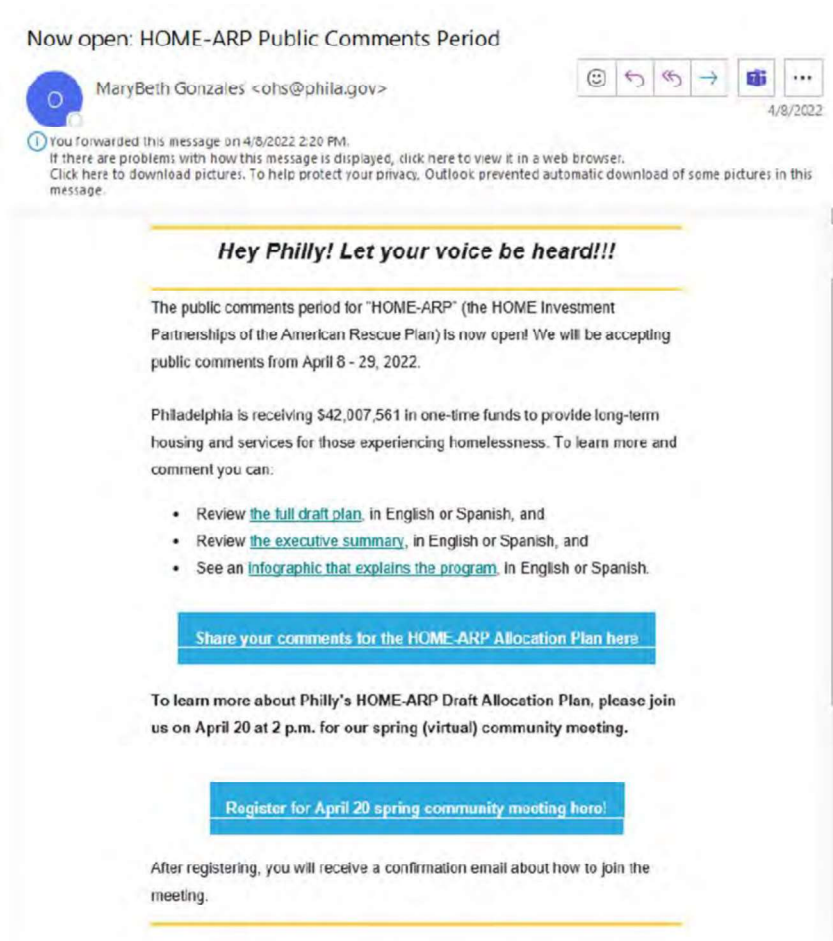
Public Comment Themes	Suggested Activities	HOME-ARP Funding Category	Added to plan or Will be considered in project review criteria	If not added to plan, why?
Recovery Housing	Prioritize recovery housing and needed supportive services to incentivize providers to create or expand recovery housing programs for those experiencing homelessness	Supportive Services & Acquisition and Development of Non-Congregate Shelters	Consideration for Project Review Criteria	The City of Philadelphia, through the behavioral health system, has a comprehensive system to address people seeking recovery. In addition, the City will utilize additional funding and resources targeted specifically for this population for housing and services.
	Including individuals in recovery as a qualifying population will help address the growing crisis of homelessness among people who are in recovery	N/A	Consideration for Project Review Criteria	The City of Philadelphia, through the behavioral health system, has a comprehensive system to address people seeking recovery. In addition, the City will utilize additional funding and resources targeted specifically for this population for housing and services.
	Recovery services: both new recovery housing, long-term recovery-focused options, and addiction treatment on demand	Supportive Services & Acquisition and Development of Non-Congregate Shelters	Consideration for Project Review Criteria	The City of Philadelphia, through the behavioral health system, has a comprehensive system to address people seeking recovery. In addition, the City will utilize additional funding and resources targeted specifically for this population for housing and services.

<p>Youth/Transition-Aged Youth (TAY)</p>	<p>Access and quality of behavioral health resources</p>	Supportive Services	Accepted	N/A
		Supportive Services	Accepted	N/A
	<p>CSH offers these “Key Considerations in Budgeting for Supportive Services” to help people stabilize with complex challenges.</p>	Supportive Services	Accepted	N/A
	<p>Development of a Specific Program for Recruitment, Retention, and Support of Landlords Willing to Rent to Transition-Aged Youth</p>	Supportive Services	Consideration for Project Review Criteria	<p>The City of Philadelphia is not establishing preferences among subpopulations for HOME-ARP projects and activities. Instead, our community will rely on the HOME ARP expanded coordinated entry version of our system to serve all 4 QPs, based upon the assessed community needs detailed in this plan. In addition, our community will comply with all fair housing, civil rights and discrimination requirements.</p>
	<p>4 Additional Youth Navigators and 1 Supervisor for Navigators</p>	Supportive Services	Consideration for Project Review Criteria	<p>The City of Philadelphia is not establishing preferences among subpopulations for HOME-ARP projects and activities. Instead, our community will rely on the HOME ARP expanded coordinated entry version of our system to serve all 4 QPs, based upon the assessed community needs detailed in this plan. In addition, our community will comply with all fair housing, civil rights and discrimination requirements.</p>

	Provision of Funds for Rental Assistance and Costs Related to Acquiring and Maintaining Housing Programming	Tenant-Based Rental Assistance	Accepted	N/A
	Flexible Funds for Prevention Services and Supportive Services that are Critical to Housing Security	Supportive Services	Accepted	N/A
	Programming to Support Special Populations at Greatest Risk of Housing Instability	Supportive Services	Consideration for Project Review Criteria	The City of Philadelphia is not establishing preferences among subpopulations for HOME-ARP projects and activities. Instead, our community will rely on the HOME ARP expanded coordinated entry version of our system to serve all 4 QPs, based upon the assessed community needs detailed in this plan. In addition, our community will comply with all fair housing, civil rights and discrimination requirements.
	Acquisition of Permanent Affordable Housing for TAY	Acquisition and Development of Affordable Rental Housing	Consideration for Project Review Criteria	The City of Philadelphia is not establishing preferences among subpopulations for HOME-ARP projects and activities. Instead, our community will rely on the HOME ARP expanded coordinated entry version of our system to serve all 4 QPs, based upon the assessed community needs detailed in this plan. In addition, our community will comply with all fair housing, civil rights and discrimination requirements.

	Mental health Services	Supportive Services	Accepted	N/A
Other	Close racial disparities: Address disparate city response to addiction in communities of color	Non-profit Capacity Building	No	We cannot prioritize specific by a single population due to remaining in compliance with all fair housing, civil rights and discrimination requirements. We will however establish equity goals.
	Unsheltered Homeless Population - will not be served by an increase in affordable housing unless there are more sheltered beds during the referral process. More than 5% must be devoted not just to converting shelter to non-congregate	Acquisition and Development of Non-Congregate Shelters	Accepted	N/A
	Affordable Housing: while the plans seeks to renovate vacant city-owned, PHA-owned, and private properties into housing, Define what affordable housing is and who is the target	Acquisition and Development of Affordable Rental Housing	Accepted	N/A
	Non-congregate units: evidence shows that congregate settings provides community and supports in ways that non-congregate settings do not allow, as many chronically homeless need a de-escalation period before permanent supportive housing is even possible for their long-term stability	Acquisition and Development of Non-Congregate Shelters	Consideration for Project Review Criteria	HOME-ARP funds cannot be used for congregate shelter
	Using ARP funds to provide a capitalized escrow account for a fixed supportive services fee per unit would ensure the most vulnerable residents receive the services needed to be successful and stable. HOME-ARP funds exceeded the 10% required by DHCD	Acquisition and Development of Affordable Rental Housing	Accepted	N/A

Appendix D: HOME-ARP Public Comment – Proof of Publications-Notices



Invitación a comentarios públicos sobre HOME-ARP



Marybeth Gonzales <ohs@phila.gov>

Reply Reply All Forward

Fri 4/3/2022 12:00 PM

If there are problems with how this message is displayed, click here to view it in a web browser

Translate message for English Never translate from Spanish Translation preferences

External Email Notice: This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

View this email in your browser



Office of
Homeless Services
CITY OF PHILADELPHIA

¡Oye Philly! ¡Que se oigan sus voces!

¡El período de comentarios públicos sobre HOME-ARP, el programa federal de

inversión en viviendas para las personas sin hogar, ya está abierto!

Aceptaremos comentarios públicos entre el 8 y 29 de abril de 2022.

Filadelfia está recibiendo un desembolso único de \$42,007,581 para
proporcionar viviendas a largo plazo y servicios para las personas sin hogar.

Para saber más, usted puede:

- [Revisar el borrador del plan completo](#), en español o inglés, y
- [Revisar el resumen ejecutivo](#), en español o inglés, y
- [Ver una infografía que explica el programa](#), en español o inglés.

Luego, comparta sus comentarios en este portal

[Plan de Asignación HOME-ARP](#)

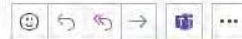
(Para ver el portal de comentarios públicos en español, seleccione la palabra

ENGLISH en la parte superior derecha de la pantalla, y luego seleccione
ESPAÑOL)

Para más información sobre el Plan de Asignación HOME-ARP propuesto
por Filadelfia, o si quiere compartir sus comentarios sobre el mismo,
participe en nuestra reunión comunitaria de la primavera (virtual), el
miércoles 20 de abril a las 2 p.m.



Marybeth Gonzales & Roberta Cancellieri <ohs@phila.gov>



4/13/2022

① If there are problems with how this message is displayed, click here to view it in a web browser.
Click here to download pictures. To help protect your privacy, Outlook prevented automatic download of some pictures in this message.

Tools and Trainings for Philly's Homeless Services Community | April 13, 2022

Tweet Share Share Forward

'It's very personal': Meet two OHS Vaccine Ambassadors making a difference

In the past two months, OHS's Vaccine Ambassadors program has helped dozens of people experiencing homelessness get fully vaccinated against COVID-19. The program encourages participation through financial incentives. This week we published a [blog post about two members](#) of the team, who nevertheless say the work is about much more than the money.

HOME-ARP public comments period now open!

We are accepting public comments for "HOME-ARP" (the HOME Investment Partnerships of the American Rescue Plan) until 29, 2022, and want to hear your voice!

The Philadelphia Office of Homeless Services has published a [draft plan on how to allocate around \\$42 million](#) in federal HOME-ARP funds. We have published a lot of resources on our website in both English and Spanish.

You can already share your ideas on our [dedicated, bilingual comments platform](#). To learn more about Philly's HOME-ARP draft allocation plan, please [register for our April 20 spring community meeting](#). This virtual meeting starts at 2 p.m., and includes simultaneous interpretation in Spanish.

The Commonwealth of Pennsylvania is also collecting ideas about [how HOME-ARP funds can help meet needs and gaps](#) through their own online survey.



Liz Hersh, OHS Director <chs@phila.gov>



4/13/2022

If there are problems with how this message is displayed, click here to view it in a web browser.

External Email Notice. This email comes from outside of City government. Do not click on links or open attachments unless you recognize the sender.

[View this email in your browser](#)

Dear Philly Homeless Services partners:

Please join us for our community meeting this Wednesday, April 20 at 2 p.m. You can [register for this virtual event now](#). The meeting will be an opportunity to hear updates from the Office of Homeless Services (OHS), and mostly learn and ask questions about [the draft HOME-ARP allocation plan](#).

In the past year OHS has helped so many [people experiencing, or at risk of, homelessness](#). Our achievements only exist because of your dedication. They belong to Philadelphia's whole network of homeless services providers. I feel incredibly proud of our work and hope you do too!

The Office of Homeless Services remains committed to community engagement and participation. I hope you will join us on Wednesday. Our collaboration is inspiring, and it is essential.

Liz Hersh
OHS Director



CITY OF PHILADELPHIA HOME-ARP ALLOCATION PLAN

HOME-ARP allocation plan (English and Spanish)

The Philadelphia Office of Homeless Services has finalized a plan to use federal homeless assistance funds known as HOME-ARP. View the plan and an infographic below. La Oficina de Servicios para las Personas sin Hogar ha finalizado un plan para utilizar fondos federales de asistencia para personas sin hogar conocidos como HOME-ARP. Ver nuestro plan y una infografía a continuación.

Search documents

Title	Description	Date	Copy Link
Infografía HOME-ARP	Una explicación de HOME-ARP, los servicios que este programa ofrece de asistencia para personas sin hogar puede financiar, así como las actividades y personas que los residentes de Filadelfia pueden recibir.	April 5, 2022	Copy Link
HOME-ARP Infographic	This explains HOME-ARP and the services this federal homeless assistance program can fund. It also explains what services and populations Philadelphia want to prioritize.	April 5, 2022	Copy Link
HOME-ARP allocation plan	A plan on how to allocate HOME-ARP funds to provide long-term housing and services to Philadelphians experiencing homelessness.	April 5, 2022	Copy Link
Plan de asignación de HOME-ARP	Un plan para asignar fondos de HOME-ARP para proporcionar viviendas a largo plazo y servicios a los habitantes de Filadelfia que se encuentran sin hogar.	April 5, 2022	Copy Link

2nd OHS posting of HOME-ARP plan in English and Spanish

phila.gov/departments/office-of-homeless-services/documents/publications/#/

City of Philadelphia Services Programs Departments Tools Publications

Title	Description	Date	Copy Link
HOME-ARP allocation plan	A plan on how to allocate HOME-ARP funds to provide long-term housing and services to Philadelphians experiencing homelessness.	April 25, 2022	Copy Link
Plan de asignación de HOME-ARP	Un plan para asignar fondos de HOME-ARP para proporcionar viviendas a largo plazo y servicios a los habitantes de Filadelfia que se encuentran sin hogar.	April 25, 2022	Copy Link

**CITY OF PHILADELPHIA
DEPARTMENT OF PLANNING AND DEVELOPMENT
DIVISION OF HOUSING AND COMMUNITY DEVELOPMENT**

**Substantial Amendment to the Annual Action Plan
- City Fiscal Year 2022/ HUD Program Year 2021 -
HOME-ARP Allocation**

Congress appropriated American Rescue Plan ("ARP") funds to be administered through HUD's HOME program to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include: (1) development and support of affordable housing; (2) tenant-based rental assistance (TBRA); (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units. On April 8, 2021, HUD allocated a total of \$42,007,561 in HOME-ARP funds to the City of Philadelphia. The City has prepared a Proposed HOME-ARP Allocation Plan in accordance with the HUD HOME-ARP guidance. The HOME-ARP Plan to be added through the Substantial Amendment to the CFY2022 Annual Action Plan can be viewed at <https://www.phila.gov/media/2022060803611/OHS-proposed-HOME-ARP-allocation-plan.pdf>. Public comments can be sent to marybeth.gonzales@phila.gov by August 11, 2022.

**Substantial Amendment to the Annual Action Plan
- City Fiscal Year 2019/ HUD Program Year 2018**

The City is proposing to add the following the activities:

- 11500 – Public Facilities and Improvements in Tacony – \$160,935.00
- 11667 – Public Facilities and Improvements in the Choice Neighborhood Implementation Area – \$1,075,317.83
- 11699 – Street Improvements, Lighting, Choice Neighborhood Implementation Area – \$8,488.81

Public comments can be sent to mark.dodds@phila.gov by August 11, 2022.

*Division of Housing and Community Development, Melissa Long, Director
City of Philadelphia, Jim Kenney, Mayor*

PORT
continued from Page 8

to their children, then about 10, were born without their parents. They went to live in their brother in the Philadelphia area. The couple spent months in jail before a judge, York County ruled that they should be released on bail of \$200 each.

"From day one, the community me together to help," said Santa Smita Storme, a local leader from for teaching traditional Indonesian dance. "We did that because they were always there for a community as well. These are phrasing people who paid air taxes and never broke the law."

ICE officials referred questions out the case to U.S. Citizenship and Immigration Services, which oversees immigration applications. A spokesperson there said an agency does not comment on individual cases because of privacy concerns.

"Such great news, such special people," said von Jochen-Popp, to now launch Holman and music studios at Kettle State stage in New Hampshire. "To me that was made right feels ally good."

At the same time, she said, the court decision is "a partial justice" that can't erase the time the respect in jail or stop the causal tacks of a system that treats immigrants fleeing violence as if they're security threats.

"I breathe a sigh of relief for my and Yulia and their children," said City Commissioner Ron Gryn, who actively supports the couple. "But I want to be sure that their cruel suffering would never have happened in the first place."

They and millions of others could have a path to U.S. citizenship that is ready and accessible.

The couple's approval of legal permanent residency, also known as a green card, came at a time when the United States has begun to deport larger numbers of Asian immigrants, many of whom have lived in

this country for decades. In Philadelphia and elsewhere, the detention and deportation of Vietnamese, Cambodians, Indonesians, and Chinese have provoked a crisis for communities that already are often ignored.

Advocates say the threat of deportation is but a different form of anti-Asian violence, coming in government policies that remove people to the very nations from which they and their families fled.

"We try to control what's in our control, but the system is random," Casco said. "Indonesians detained under the same circumstances at the same time were deported."

Even as his legal motions went forward, along with a separate federal lawsuit, he said, ICE was trying to deport the couple, seizing travel documents and permission from the Indonesian government to send them back.

The arrival of the pandemic helped their case. Health restrictions caused widespread closures and delays in immigration courts. Time passed, the couple's daughter grew — and the elder turned 21.

That meant, as an American citizen, she could file what's called an I-130 petition with USCIS. That's how citizens and permanent residents seek to have close relatives, such as parents, either come to the United States or stay in the country if they're already here.

Legal permanent residency carries the right to apply for citizenship after five years. Ely and Yulia say they're eager to become citizens, to participate fully in American life. He now works at a warehouse, she as a cashier.

In the spring, the couple's elder daughter graduated from Swarthmore College; the younger will be a freshman at the University of Pennsylvania in the fall.

There are no words, Ely said, to describe their gratitude for all that people did to support them. "We're really thankful for everything," she said. "Without them, I don't think we'd be here now."

© 2020 Philadelphia Inquirer
610-481-4800 or JeffGarrago@inquirer.com

legal notices

CITY OF PHILADELPHIA DEPARTMENT OF PLANNING AND DEVELOPMENT DIVISION OF HOUSING AND COMMUNITY DEVELOPMENT

Substantial Amendment to the Annual Action Plan - City Fiscal Year 2022/ HUD Program Year 2021 - HOME-ARP Allocation

Emergency Amendment to the Annual Action Plan (AAP) for the City of Philadelphia for the City Fiscal Year 2022/ HUD Program Year 2021. The City is proposing to amend the AAP to reflect the City's need to allocate funds to the HOME-ARP program. The City is proposing to amend the AAP to reflect the City's need to allocate funds to the HOME-ARP program. The City is proposing to amend the AAP to reflect the City's need to allocate funds to the HOME-ARP program.

Substantial Amendment to the Annual Action Plan - City Fiscal Year 2019/ HUD Program Year 2018

The City is proposing to amend the AAP to reflect the City's need to allocate funds to the HOME-ARP program. The City is proposing to amend the AAP to reflect the City's need to allocate funds to the HOME-ARP program. The City is proposing to amend the AAP to reflect the City's need to allocate funds to the HOME-ARP program.

LEGAL NOTICES

NOTICE OF HEARING
The City of Philadelphia is holding a public hearing on the Substantial Amendment to the Annual Action Plan for the City Fiscal Year 2022/ HUD Program Year 2021. The hearing will be held on August 11, 2020, at 10:00 AM. The hearing will be held at the City of Philadelphia, Department of Planning and Development, Division of Housing and Community Development, 1515 Arch Street, Philadelphia, PA 19102.

NOTICE OF HEARING

The City of Philadelphia is holding a public hearing on the Substantial Amendment to the Annual Action Plan for the City Fiscal Year 2022/ HUD Program Year 2021. The hearing will be held on August 11, 2020, at 10:00 AM. The hearing will be held at the City of Philadelphia, Department of Planning and Development, Division of Housing and Community Development, 1515 Arch Street, Philadelphia, PA 19102.

NOTICE OF HEARING

The City of Philadelphia is holding a public hearing on the Substantial Amendment to the Annual Action Plan for the City Fiscal Year 2022/ HUD Program Year 2021. The hearing will be held on August 11, 2020, at 10:00 AM. The hearing will be held at the City of Philadelphia, Department of Planning and Development, Division of Housing and Community Development, 1515 Arch Street, Philadelphia, PA 19102.

ESTATE NOTICES

NOTICE OF HEARING
The City of Philadelphia is holding a public hearing on the Substantial Amendment to the Annual Action Plan for the City Fiscal Year 2022/ HUD Program Year 2021. The hearing will be held on August 11, 2020, at 10:00 AM. The hearing will be held at the City of Philadelphia, Department of Planning and Development, Division of Housing and Community Development, 1515 Arch Street, Philadelphia, PA 19102.

ESTATE NOTICES

The City of Philadelphia is holding a public hearing on the Substantial Amendment to the Annual Action Plan for the City Fiscal Year 2022/ HUD Program Year 2021. The hearing will be held on August 11, 2020, at 10:00 AM. The hearing will be held at the City of Philadelphia, Department of Planning and Development, Division of Housing and Community Development, 1515 Arch Street, Philadelphia, PA 19102.

ESTATE NOTICES

The City of Philadelphia is holding a public hearing on the Substantial Amendment to the Annual Action Plan for the City Fiscal Year 2022/ HUD Program Year 2021. The hearing will be held on August 11, 2020, at 10:00 AM. The hearing will be held at the City of Philadelphia, Department of Planning and Development, Division of Housing and Community Development, 1515 Arch Street, Philadelphia, PA 19102.

INQUIRER.COM

MEETING NOTICES

Open House for the City of Philadelphia's Annual Action Plan (AAP) for the City Fiscal Year 2022/ HUD Program Year 2021. The open house will be held on August 11, 2020, from 10:00 AM to 12:00 PM. The open house will be held at the City of Philadelphia, Department of Planning and Development, Division of Housing and Community Development, 1515 Arch Street, Philadelphia, PA 19102.

Open House for the City of Philadelphia's Annual Action Plan (AAP) for the City Fiscal Year 2022/ HUD Program Year 2021. The open house will be held on August 11, 2020, from 10:00 AM to 12:00 PM. The open house will be held at the City of Philadelphia, Department of Planning and Development, Division of Housing and Community Development, 1515 Arch Street, Philadelphia, PA 19102.

Open House for the City of Philadelphia's Annual Action Plan (AAP) for the City Fiscal Year 2022/ HUD Program Year 2021. The open house will be held on August 11, 2020, from 10:00 AM to 12:00 PM. The open house will be held at the City of Philadelphia, Department of Planning and Development, Division of Housing and Community Development, 1515 Arch Street, Philadelphia, PA 19102.

ESTATE NOTICES

The City of Philadelphia is holding a public hearing on the Substantial Amendment to the Annual Action Plan for the City Fiscal Year 2022/ HUD Program Year 2021. The hearing will be held on August 11, 2020, at 10:00 AM. The hearing will be held at the City of Philadelphia, Department of Planning and Development, Division of Housing and Community Development, 1515 Arch Street, Philadelphia, PA 19102.

ESTATE NOTICES

The City of Philadelphia is holding a public hearing on the Substantial Amendment to the Annual Action Plan for the City Fiscal Year 2022/ HUD Program Year 2021. The hearing will be held on August 11, 2020, at 10:00 AM. The hearing will be held at the City of Philadelphia, Department of Planning and Development, Division of Housing and Community Development, 1515 Arch Street, Philadelphia, PA 19102.

INQUIRER.COM

Page 43

INQUIRER.COM

MEETING NOTICES

HEREBY GIVEN THAT THE

Carol R. Coffey
Secretary

Michael A. Decker
Chief Clerk

1000

SERVICE BY PUBLICATION
IN THE COURT OF COMMON PLEAS OF
DELAWARE COUNTY

Please note that all comments must be received by the Board Secretary by close of business on June 22, 2022, to be considered for the Board Meeting or by close of business on June 23, 2022, to be considered for the Committee Meetings. All comments received will become part of the public record and will be included in the transcript of the Board Meeting, which will be subsequently posted on the SEPTA website at www.septa.org. According to the Board Meeting will also be posted for viewing on SEPTA's website at www.septa.org/notice.

Ex-cop: DA's plea deal 'disrespectful' to police

The FOP and former officer - who was nearly shot on the job - blasted the offer of 4-8 years in prison.

By Chris Palmer
STAFF WRITER

A former Philadelphia officer who was shot as while responding to a call on the District Parkway on Thursday for making what he called a "disrespectful" stop plus offer to the

Former Officer Patrick Keller said his colleagues had drafted a memorandum a plan called for instead of a three- to eight-year prison sentence followed by three years of probation.

Keller, 35, has now work as an officer in a suburban police department that he declined to name. He said he was not sure he would not match the severity of the crime. And he feared prosecution for not sufficiently investigating before reaching that conclusion.

Several rounds of Police Local 2000 had the offer a "second chance" to officers who had been fired for cause. Keller was one of the officers who were fired for cause.

Former Police Officer Keller said he was not sure he would not match the severity of the crime. And he feared prosecution for not sufficiently investigating before reaching that conclusion.

The remarks were made during a meeting of the Police Local 2000.

"I want this case to go on trial on 2 Jan. When the court first closed I was in losing my life," Koller said during a news conference to public union leaders here in American Philadelphia. He did not specify what union he would prefer named.

John McNulty, president of the

Kiefer was "born as a police officer," said McSherry, who is a socialist. Kiefer also gave police preference. "So [for] the regular average person in the community, what does that say to itself?" "There's an unacceptability to them."

The remarks were another part



He dismisses much of the past long-standing between some police officers and Kravner's office.

The union has repeatedly criticized the DHS mother-son approach, saying it has contributed to the high gun violence crisis by undermining citizenship.

Kravner has defended his position and said his critics have

James Whit, a spokesman for Krasner's office, said officials view Keller's case "as a test case that is being presented vigorously and justly in light of the facts and the law."

Police said Koller and an officer responded to the black of South 14th Street to answer the Oct. 22, 2000, for personal domestic incidents involving a gun. The officers arrested Dennis Smith on the charge of a battery, police said, and took him where the gun was.

Ridder approached him, dug him from a scuffle and the find as they fell onto a mat.

Sizak was initially charged with crimes including attempted murder, but Governor Thomas Coary Judge Diana Anshel agreed to drop the charge last

Jahshik would need to approve the terms of any guilty plea to

Rob said a hearing scheduled for Friday, at which Smith was expected to swear his plea, was likely to be delayed pending a criminal health evaluation by Smith.

legal notices

[illegible][illegible]

1991 **1992** **1993** **1994** **1995** **1996** **1997** **1998** **1999** **2000** **2001** **2002** **2003** **2004** **2005** **2006** **2007** **2008** **2009** **2010** **2011** **2012** **2013** **2014** **2015** **2016** **2017** **2018** **2019** **2020** **2021** **2022** **2023** **2024** **2025** **2026** **2027** **2028** **2029** **2030** **2031** **2032** **2033** **2034** **2035** **2036** **2037** **2038** **2039** **2040** **2041** **2042** **2043** **2044** **2045** **2046** **2047** **2048** **2049** **2050** **2051** **2052** **2053** **2054** **2055** **2056** **2057** **2058** **2059** **2060** **2061** **2062** **2063** **2064** **2065** **2066** **2067** **2068** **2069** **2070** **2071** **2072** **2073** **2074** **2075** **2076** **2077** **2078** **2079** **2080** **2081** **2082** **2083** **2084** **2085** **2086** **2087** **2088** **2089** **2090** **2091** **2092** **2093** **2094** **2095** **2096** **2097** **2098** **2099** **2100** **2101** **2102** **2103** **2104** **2105** **2106** **2107** **2108** **2109** **2110** **2111** **2112** **2113** **2114** **2115** **2116** **2117** **2118** **2119** **2120** **2121** **2122** **2123** **2124** **2125** **2126** **2127** **2128** **2129** **2130** **2131** **2132** **2133** **2134** **2135** **2136** **2137** **2138** **2139** **2140** **2141** **2142** **2143** **2144** **2145** **2146** **2147** **2148** **2149** **2150** **2151** **2152** **2153** **2154** **2155** **2156** **2157** **2158** **2159** **2160** **2161** **2162** **2163** **2164** **2165** **2166** **2167** **2168** **2169** **2170** **2171** **2172** **2173** **2174** **2175** **2176** **2177** **2178** **2179** **2180** **2181** **2182** **2183** **2184** **2185** **2186** **2187** **2188** **2189** **2190** **2191** **2192** **2193** **2194** **2195** **2196** **2197** **2198** **2199** **2200** **2201** **2202** **2203** **2204** **2205** **2206** **2207** **2208** **2209** **2210** **2211** **2212** **2213** **2214** **2215** **2216** **2217** **2218** **2219** **2220** **2221** **2222** **2223** **2224** **2225** **2226** **2227** **2228** **2229** **2230** **2231** **2232** **2233** **2234** **2235** **2236** **2237** **2238** **2239** **2240** **2241** **2242** **2243** **2244** **2245** **2246** **2247** **2248** **2249** **2250** **2251** **2252** **2253** **2254** **2255** **2256** **2257** **2258** **2259** **2260** **2261** **2262** **2263** **2264** **2265** **2266** **2267** **2268** **2269** **2270** **2271** **2272** **2273** **2274** **2275** **2276** **2277** **2278** **2279** **2280** **2281** **2282** **2283** **2284** **2285** **2286** **2287** **2288** **2289** **2290** **2291** **2292** **2293** **2294** **2295** **2296** **2297** **2298** **2299** **2300** **2301** **2302** **2303** **2304** **2305** **2306** **2307** **2308** **2309** **2310** **2311** **2312** **2313** **2314** **2315** **2316** **2317** **2318** **2319** **2320** **2321** **2322** **2323** **2324** **2325** **2326** **2327** **2328** **2329** **2330** **2331** **2332** **2333** **2334** **2335** **2336** **2337** **2338** **2339** **2340** **2341** **2342** **2343** **2344** **2345** **2346** **2347** **2348** **2349** **2350** **2351** **2352** **2353** **2354** **2355** **2356** **2357** **2358** **2359** **2360** **2361** **2362** **2363** **2364** **2365** **2366** **2367** **2368** **2369** **2370** **2371** **2372** **2373** **2374** **2375** **2376** **2377** **2378** **2379** **2380** **2381** **2382** **2383** **2384** **2385** **2386** **2387** **2388** **2389** **2390** **2391** **2392** **2393** **2394** **2395** **2396** **2397** **2398** **2399** **24**

[illegible][illegible]



Good Morning, Philly.

Sign up for the **PHILLY Inquirer's Morning**

It's the start of a new day, and you're looking for a good morning. The **PHILLY Inquirer's Morning** is the perfect way to start your day. It's a daily newsletter that brings you the latest news, weather, and more. Sign up today and get it delivered to your inbox every morning.

Sign up for the PHILLY Inquirer's Morning

It's the start of a new day, and you're looking for a good morning. The **PHILLY Inquirer's Morning** is the perfect way to start your day. It's a daily newsletter that brings you the latest news, weather, and more. Sign up today and get it delivered to your inbox every morning.

Good Morning, Philly.

Sign up for FREE!
Inquirer.com/Morning

Public Hearing

The third period was only open for public comment only. Calls were accepted, translation services were made available, received by mail and drop box at Municipal Services Building was made available.

List of Participants Providing Testimony

Rachel Falkove, Executive Director, Philadelphia Interfaith Hospitality Network (soon to be Family Promise of Philadelphia) – she stated that she was also representing the following groups: Congreso, Help USA, People’s Emergency Center and Valley Youth House

Greg Wertman – President, HAPCO Philadelphia

Jessie Keel – Community Organizer, Youth Advocate & Your Mentor

Liam Spady – Temple Student, Co-Chair of Philly Home 4 Youth

Maria Murray – Advocate for Juvenile Law Center for Transforming Youth Systems

SUMMARY OF COMMENTS

1. Increase funding for homeless prevention to address increase in eviction filings.
 - This recommendation was not accepted as the City has other resources for eviction prevention.
2. Set aside 20% of HOME-ARP funding for targeting programming, support and permanent supportive housing projects for youth and young adults.
 - This recommendation was not accepted as set-asides for specific populations are not eligible under the HOME-ARP regulations. In addition, the City was recently awarded \$8.7 million in YHDP funds to address youth homelessness.

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

City of Philadelphia

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

23-6003047

*** c. UEI:**

QPDZXKQFL635

d. Address:

*** Street1:**

1234 Market Street

Street2:

17th Floor

*** City:**

Philadelphia

County/Parish:

Philadelphia

*** State:**

PA: Pennsylvania

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

19107-3705

e. Organizational Unit:

Department Name:

Planning & Development

Division Name:

Housing & Community Developmen

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

Ms

*** First Name:**

Melissa

Middle Name:

*** Last Name:**

Long

Suffix:

Title:

Director of DHCD

Organizational Affiliation:

*** Telephone Number:**

215-686-9789

Fax Number:

*** Email:**

melissa.long@phila.gov

Application for Federal Assistance SF-424

* 9. Type of Applicant 1: Select Applicant Type:

X: Other (specify)

Type of Applicant 2: Select Applicant Type:

C: City or Township Government

Type of Applicant 3: Select Applicant Type:

* Other (specify):

Municipality

* 10. Name of Federal Agency:

U.S. Dept. of Housing & Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.218

CFDA Title:

HOME Investment Partnership

* 12. Funding Opportunity Number:

* Title:

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

HOME - American Rescue Plan (ARP) formula entitlement funding (Annual Action Plan Year 47) - Philadelphia

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant **1,2,8,13*** b. Program/Project **1,2,8,13**

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:* a. Start Date: **09/20/2021*** b. End Date: **09/30/2021****18. Estimated Funding (\$):**

* a. Federal	42,007,561.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	42,007,561.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: Ms. * First Name: Anne Fadullon

Middle Name:

* Last Name: Fadullon

Suffix:

* Title: Director of Dept. of Planning & Development* Telephone Number: 215-686-4600 Fax Number: * Email: anne.fadullon@phila.gov

* Signature of Authorized Representative:

* Date Signed: **10/05/2022**

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director of Planning & Development
APPLICANT ORGANIZATION City of Philadelphia	DATE SUBMITTED 10/13/2022

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director of Planning & Development
APPLICANT ORGANIZATION City of Philadelphia	DATE SUBMITTED 10/13/2022

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official

10/13/2022

Date

Director of Planning & Development

Title