



HOME-ARP Allocation Plan Template with Guidance

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Template:

Describe the consultation process including methods used and dates of consultation:

Staff from Pierce County Human Services worked with staff from City of Tacoma’s Community and Economic Development Department, which administers the other HOME Consortium located in Pierce County as the Tacoma-Lakewood Consortium of Cities. The

strategic decision to collaborate in community consultation was made to decrease the burden on organizations consulted, and to streamline communications across Pierce County regarding HOME-ARP.

Joint efforts included presentations and meetings with the Continuum of Care (CoC), Housing Authorities, coordinated entry staff, and the lived experience communities. In addition, the consortiums issued an informational memo that was delivered to organizations via email on April 26, 2022. Organizations were invited to provide additional feedback, data, and input to the consortia in an online form before its closure on May 11, 2022.

Staff also conducted presentations and held conversations with required consultation partners. The CoC consultation meeting was completed on April 20, 2022 to a quorum of members. Meetings with the Tacoma Housing Authority and Pierce County Housing Authorities were held on May 2, 2022 and May 5, 2022 respectively. The lived experiences workgroup was consulted on May 16, 2022. Although we did not receive formal responses from all member organizations of the CoC, they were represented in the meetings where we asked for input.

The informational memo included an outline of the consortiums' responsibilities, details of the consortiums' respective grants, an outline of the HOME-ARP program, all potential uses for funds, the qualifying populations, and outlined the respective decision-making processes and public engagement periods. The linked Microsoft Form inquired about existing HOME-ARP qualifying activities, planned expansion of these services, size and need gaps of the qualifying populations, and for organizational input of how the funds may best be used to benefit qualifying populations. In addition, organizations were asked to self-identify whether their responses and organizational activities are in the City of Lakewood, City of Tacoma, other areas of Pierce County, or across several of these outlined jurisdictions. This allowed for consortiums to only include organizations that serve their communities.

Program staff distributed the information among work groups and further contacted 27 organizations directly. Organizations consulted were identified utilizing departmental relationships and working groups, as well as direct outreach to organizations which may serve or contact any of the qualifying populations. These organizations represented all those required by HOME-ARP, including all housing authorities, the Continuum of Care serving Pierce County, as well as homeless service providers, veteran's services, public agencies serving qualified populations, domestic violence service providers, sexual assault and trafficking service providers, organizations addressing civil rights and/or the needs of persons with disabilities, and fair housing organizations. A second round of emails was sent out on May 9 to increase the response rate.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Tacoma, Lakewood/Pierce County CoC	Continuum of Care	Presentation & Discussion period, with email follow up & form for all CoC members to fill out	Mentioned medical needs (i.e., open wounds) prevent access to shelters, high needs for on-demand shelter, increased housing affordability stock, wrap around services that prevent future occurrences of homelessness designed with lived-experiences in mind, also expressed excitement for funds and use of them for all qualifying populations
Pierce County Housing Authority	Housing Authority	Presentation & Discussion period, with email follow up	Discussed having a large wait list and an increasing need for affordable units that decrease successful voucher-supported housing searches. Mentioned health barriers including addiction and mental health are barriers to successful TBRA use, necessitating services and properties that go beyond what the housing authority can provide without nonprofit partners, or tenant readiness to go into housing without services.
Tacoma Housing Authority	Housing Authority	Presentation & Discussion period, with email follow up	Mentioned that coordinated entry is an improvement but can still inhibit referral if inaccessible, TBRA is effective but only so far as housing stock is available, reminded that supportive services require long-term funding availability and staff
Associated Ministries	Homeless Service Provider	Form & Memo	There is a deficit of affordable housing for people with disabilities, shared housing options for people with criminal histories. Youth access to vocational schools and subsequent good-paying jobs is critical to

			prevention. Mental health institutions as well as domestic violence support are high-barrier and extremely limited in resources compared to need. Capital and service expansion is necessary to meet these needs and the needs of other special populations.
Korean Women's Association	Homeless Service Provider	Form & Memo	No Response
Low Income Housing Institute	Homeless Service Provider	Form & Memo	No Response
Tacoma Rescue Mission	Homeless Service Provider	Form & Memo	No Response
Nativity House	Homeless Service Provider	Form & Memo	No Response
R.I.S.E	Homeless Service Provider	Presentation & Discussion in CoC meeting, with form follow up	Cohesive support services, including education, are needed in the community
Share and Care House	Homeless Service Provider	Form & Memo	No Response
Metropolitan Development Council	Homeless Service Provider	Form & Memo	No Response
LASA	Homeless Service Provider	Form & Memo	No Response
Cascade Cares	Homeless Service Provider; Elderly & Disability Service Provider	Presentation & Discussion in work group meeting, with form follow up	Lack of units and services available for the population served. Challenges maintaining services due to low Medicaid reimbursements and increased costs of wages, food, and inflation. Gaps in ability to serve those living with alcohol or drug use disorder, or severe mental health. Necessitates regional collaborative efforts and partnerships to fill gaps.
Pierce County Veteran Services Office	Veterans Services/ Government Organization serving QPs	Presentation & Discussion in work group meeting, with form follow up	There is a lack of affordable housing to utilize VASH vouchers, there is a need for more supportive housing units, and a need for shelters, in particular

			those where women and LGBTQ+ veterans will feel safe.
Tacoma Veterans Center	Veterans Services/Organization	Form & Memo	No Response
Forward Operating Base Hope	Veterans Services/Homeless Service Provider	Form & Memo	Need for increased affordable housing units
YWCA	Domestic Violence Victims Services	Form & Memo	Access to noncommunal shelter for DV/SA survivors, deeply affordable housing stock (below 30% AMI), and permanent supportive housing are scarce. Legal services for DV survivors need sustainable and consistent funding. Barriers exist for DV clients without income, children or access to TANF.
New Phoebe House	Domestic Violence Victims Services	Form & Memo	Waitlists and access to affordable housing and supportive housing are very long, preventing them from moving families out quicker and assisting more domestic violence victims.
Crystal Judson Family Justice Center	Domestic Violence Victims Services, Public Organization	Form & Memo	No Response
Fair Housing Center of Washington	Org Addressing Fair Housing	Email & Memo	Awardee of funds should provide their affirmative marketing plan during RFP/NOFA process, regularly scheduled fair housing trainings should be required, and ways to boost tenant awareness of fair housing laws and resources should be considered.
Rainbow Center	Organization Addressing Civil Rights	Form & Memo	No Response
Tacoma Urban League	Organization Addressing Civil Rights	Form & Memo	Organization around homelessness prevention and organizations providing services for prevention is important, requires community capacity. A need for more beds and housing comes from inability to access services and underemployment, as

			well as consistent access and flexibility.
City of Tacoma Civil Rights	Organization Addressing Civil Rights, Public Organization	Presentation & Discussion in CoC meeting, with form follow up	There is a need for affordable housing that is accessible to those with disabilities, especially emotional and intellectual disabilities
Vadis	Disability and Homeless Service Provider	Form & Memo	No Response
Tacoma Area Commission on Individuals with Disabilities (TACID)	Fair Housing, Organization addressing needs of persons with disabilities	Presentation & Discussion in CoC meeting, with form follow up	Resources are necessary to build Lived Experiences communities – especially those with disabilities and BIPOC – into the design of services, affordable housing, and homelessness programs. Accessibility in programs and physical design is necessary to serve these communities equitably.
Tacoma Probono Community Lawyers	Homeless Service Provider	Form & Memo	There is a lack of legal services to understand rights to housing, especially for survivors of domestic violence, that could prevent homelessness through evictions and criminal records. What services do exist need more capacity to coordinate across organizations.
Puyallup Tribe of Indians	Homeless Service Provider	Form & Memo	No Response
Tacoma/Pierce County Affordable Housing Consortium	Homeless Service Provider	Form & Memo	No Response
Tacoma Pierce County Coalition to End Homelessness	Homeless Service Provider	Form & Memo	Funds should come online quickly, align with the Pierce County Comprehensive Plan to End Homelessness, and fill a funding gap. They should be used in concert with interjurisdictional bonds.
United Way of Tacoma	Homeless Service Provider	Form & Memo	No Response
Homelessness Lived Experience Work Group	Homeless Service Provider	Form & Memo	No Response

Elevate Health	Homeless Services, Disability Services, Veterans Services	Presentation & Discussion in work group meeting, with form follow up	Cost of living has raised the need for shelter services and affordable housing across Pierce County, entire County lacks flexible medical respite care sites. Non-congregate shelter is critical for populations like LGBTQ, BIPOC, mental health issues, and those in recovery, as general shelter settings are inappropriate for them. Mobile services coordinated across agencies to meet homeless where they would be helpful.
Homelessness Lived Experience Work Group	Homeless Service Provider	Form & Memo	Alternative services and outreach are needed, including peer navigation services. Individuals face barriers or come to institutions like hospitals without being connected to further resources that will enable long-term housing. Limits to who qualifies for CE poses another barrier to homelessness prevention, and for some, in gaining permanent housing.

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

Six total meetings took place, providing the County with feedback from a diversity of perspectives, providers, and individuals belonging to the qualified populations. There was a total of 18 form responses from 15 organizations, supplementing the conversations and data gathered in meetings with additional valuable information from individual organizations.

Feedback from consultation, described in the table above, provided evidence that an increase in all eligible activities is necessary throughout Pierce County to meet the needs of qualified populations. Overall, consultation partners highlighted a need for creative and barrier-reduced options throughout Pierce County, specialized programs that will assist special populations, and a need for integration in the County system.

Furthermore, consultation partners identified a clear need to provide eligible activities in such a way that will be appropriate and sensitive to populations throughout the county. In particular, consultation partners mentioned the disabled, those facing mental and addiction health issues, youth, BIPOC, LGBTQ+, and domestic violence victims. Programs, shelter, and housing should be designed to serve these populations. Examples included LGBTQ+ individuals who may not

be comfortable in a congregate shelter setting and may be more comfortable in a non-congregate shelter setting, or including people with disabilities in the design process to create inclusive affordable housing options beyond the scope of ADA. Each of these examples requires that Pierce County have a diverse range of capital and programmatic features to fit the flexible needs of the population.

Finally, consultation partners provided the County with detailed stories, data, and priorities that were relevant to all qualified populations. Each of these has been carefully considered when crafting the Allocation Plan, and the data provided by consultation partners is detailed throughout this Plan.

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

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

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Template:

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Date(s) of public notice: 6/15/2022***
- ***Public comment period: start date – 6/15/2022 end date – 6/30/2022***
- ***Date(s) of public hearing: 6/30/2022***

Describe the public participation process:

Pierce County went beyond the minimum requirements of HOME-ARP in the public participation process.

Pierce County gave public notice in the New Tribune on June 15^h to announce the public hearing, provide the information on how to attend, provide means to give public comment via phone, email, or in-person, and to make notice of translation services available. Meetings were provided in-person, but also streamed and available to listen to over the phone.

In addition to making the draft plan available at Pierce County locations, a HOME-ARP webpage was created for the purpose of hosting presentations, a feedback form, and recordings of the public meetings. The County provided two preliminary informational public meetings occurring on Wednesday, June 8th in public libraries. The public hearing occurred as part of a Citizens' Advisory Board meeting on June 30th, 2022.

Pierce County additionally created digital media that describes the HOME-ARP program, qualifying populations, consortium grant and proposed use of the plan. All meetings and feedback period were promoted in social media advertisements in addition to the public notice.

Describe efforts to broaden public participation:

Pierce County broadened public participation in part by increasing the number of public hearings at a range of locations across the County with accessibility features, having an increased online presence, and in directly consulting with members of the lived experience community.

Locations for the additional public hearings were chosen based on accessibility to transit and their varied geographic locations throughout the County. The meetings occurred on June 8th at 1 PM and 5:30 PM. Varied times and locations were deliberately chosen to ensure that individuals with varying schedules could attend. Furthermore, during the meeting, automated captioning was provided to ensure that hard-of-hearing individuals were able to participate, and a recording was taken to post to the HOME-ARP webpage later.

The HOME-ARP webpage was a central location for households to engage with meeting materials, recordings, transcripts, and the draft plan. The webpage had built-in translation capabilities to support those communities where English is not the first language.

In addition, in recognizing the populations the HOME-ARP program serves, Pierce County conducted direct outreach to the homeless Lived Experiences Community Workgroup. This workgroup consists of both current and formerly homeless individuals who are diverse in representing several of the different HOME-ARP QPs. This outreach ensured the communities this program will serve are our central focus in HOME-ARP planning and are given opportunity to provide input at both the consultation and public participation phases.

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

1. Public Comment: Annette Agee, community member and board member for the South Tacoma Neighborhood Council and on the TEMS 69th & Proctor Tiny Homes Community Advisory Councils, expressed support for HOME-ARP funds being used for a shelter with medical respite care. In addition, Annette recommended that service features of the shelter focus on building human relationships and how to conduct direct outreach with individuals who refuse services.
 - a. County Response: Annette's recommendations are at the heart of programmatic design. In addition to containing medical respite care in half the beds, this non-congregate shelter will further serve to build relationships that connect individuals to resources and build relationships in the community. The goal will be to assist individuals in achieving healthy, permanent, and affordable housing, which requires building human relationships. This goal will further be supported by Pierce County's recent expansion of the navigation system in coordinated entry. The navigation service provider does seek to hire formerly homeless individuals, which the Lived Experiences Coalition cited was critical to building relationships and reaching individuals who previously refused shelter and services.
2. Public Comment: Emily Hernandez, community member. Emily expressed support for the HOME-ARP plan, and appreciated the public meeting recording which she also livestreamed to community-minded individuals. Emily further inquired about the mechanisms that would be used for limiting rental increases, and the possibilities for resident owned communities.
 - a. County Response: Within the context of the HOME-ARP program for non-congregate shelter with medical respite care, there will not be any rents collected on individuals who are staying. In addition, a resident-owned community would not be appropriate for a shelter which is intended to be temporary. Finally, the County does have affordable housing programs which, in recent years, have supported homeownership projects. Depending on the funding source and project specifics, there may be possibilities for resident owned communities to receive County funding through the annual competitive NOFA.
3. Public Comment: Jennifer Sullivan, member of the Human Services Citizens Advisory board representing the community. Jennifer inquired whether there would be staff on site of the non-congregate shelter providing medical respite services, and whether those staff would be funded or employed by the County.
 - a. County Response: Yes, the service provider who wins the HOME-ARP contract will have staff, such as a registered nurse, on-site to provide medical respite services. The staff will be employed by the service provider, which will also determine operation funding.
4. Public Comment: Gradi Jordan, community member. Gradi expressed interest and appreciation that the County was keeping the public informed through the HOME-ARP webpage.
 - a. County Response: N/A

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

All comments were accepted, and recommendations responded to.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Template:**OPTIONAL Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	409	146	794	722	30								
Transitional Housing	68	28	22	22	71								
Permanent Supportive Housing	472	147	575	544	35								
Other Permanent Housing	298	92	95	95	0								
Sheltered Homeless						134	743	118	40				
Unsheltered Homeless						220	928	167	233				
Current Gap										1,502	453	1,175	1,095

Data Sources: Consultation; Continuum of Care Housing Inventory Count 2021 (HIC)

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	121,521		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	9,092		
Rental Units Affordable to HH at 50% AMI (Other Populations)	22,891		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		14,835	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		19,500	
Current Gaps			34,335

Suggested Data Sources: Comprehensive Housing Affordability Strategy 2014-2018 (CHAS)

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

There are several ways that each of these populations within Pierce County's borders may be estimated. It is important to understand that, while each of these is based on different reports, they may be incomplete due to underreporting and lack of access or public knowledge of programs which collect data. This suggests that the numbers presented in the following section are lower than the actual number of these populations in Pierce County.

Homeless as defined in 24 CFR 91.5

According to HMIS data, there were 4,105 homeless individuals throughout Pierce County on May 2, 2022. Prior to 2022, the number of homeless in Pierce County had not reached 4,000 on any given date. These numbers represent both an increase in homelessness as it relates to the pandemic, but also reflects the increase in outreach teams, expanded and more available shelter, and additional options for engaging with the Coordinated Entry system. While this represents a single day in 2022, HMIS identified 13,009 individuals who experienced homelessness at some point in 2021.

In 2021, homeless individuals were also disproportionately People of Color in Pierce County. 46% of homeless individuals are white, compared to 75% of the county's population, 28% Black compared to 7% countywide, 16% mixed race compared to 7% countywide, 4% Pacific Islander compared to 1% countywide, 3% American Indian or Native compared to 1% countywide, and 1% Asian compared to 6% countywide.

At Risk of Homelessness as defined in 24 CFR 91.5

According to CHAS, there are 16,355 renter households earning below 30% AMI with a severe housing problem. The vast majority of these, 14,045 households, faced a severe housing problem related to spending more than 50% of their income on rent. The rest face severe housing issues including incomplete plumbing facilities, lack of complete kitchens, and overcrowding. Furthermore, Pierce County's 2020 – 2024 Consolidated Plan for HUD programs estimated 920 families were in precarious living situations or being released from an institution in the prior year. When these numbers are added together, they reach a total of 17,275 households which are currently at risk of homelessness; however, the County recognizes actual numbers are likely higher due to underreporting and economic shifts, including loss of income and rising rents, that have occurred since the most recent CHAS numbers were published.

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

According to our most recent domestic violence hotline data, over 5,000 domestic violence hotline calls were responded to in 2021, totaling 1,700 clients served. 65% of domestic violence victims identified themselves as non-white/Caucasian, 30% reported a disability and 87%

reported themselves as low or very low income. Furthermore, domestic violence service providers estimate that they have between 60 and 100 households on waitlists for emergency housing, and up to 300 households on waitlists for permanent survivor housing.

Furthermore, the sexual assault and trafficking service providers provided crisis support, general, medical and legal advocacy for 1,158 clients in 2021, of which 208 participated in the Sex Trafficking & Exploitation Program with service providers, local law enforcement, and the Children's Advocacy center.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

This category describes two different subsets of individuals, those who are currently housed due to temporary assistance programs that require ongoing assistance, and those who are at the greatest risk of housing instability, as determined by household economic conditions and household events.

One of the ways that Pierce County can estimate these households is through the County's Rental and Utility Assistance Program. In 2021, households under 80% AMI were eligible, with prioritization given to those who were under 50% AMI, experiencing unemployment, or at imminent risk of eviction. From March to December of 2021, the county received 18,600 applications. 1,430 applicants were seniors, and 1,248 were Veterans. Furthermore, 40% of applicants were White, 26% were Black, 12% mixed 2 or more races, 9% Pacific Islander, 5% Asian, and 2% American Indian. In all, 9,128 households (41.2%) were served with an average assistance of \$10,500 per household. 3,891 recipients were under 30% AMI and 2,426 were between 30 and 50% AMI. There was a total of 6,317 households served under 50% AMI, which would be a low estimate of households at the highest risk of housing instability due to not including households which were not aware of the program, did not apply to the program, or were found ineligible.

Further estimates can be derived from the County's upcoming 2022 Housing Needs Assessment. According to the Housing Needs Assessment, which uses CHAS 2014 to 2018 data, 14,045 (66.8%) of renter households earning less than 30% AMI are severely housing cost burdened (>50% of income spent on housing). In addition, ongoing pandemic-related economic conditions have exacerbated rent burden, as households with low earnings lost both jobs at a higher rate and access to social services related to the pandemic contracted as rent costs surged across Pierce County. When paired with the households assisted by the County's Rental and Utility Assistance program and those with AMIs between 30 and 50%, there are an estimated 16,471 households at the greatest risk of housing instability.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

According to the 2021 Housing Inventory County Report, Pierce County currently has 1,169 year-round beds available, with 1,032 being in emergency shelter and 137 being transitional housing. Within this system there are 457 non-congregate units and 437 congregate units, those being where a household or individual would be expected to room with individuals outside their household. 71 beds/44 units are dedicated to domestic violence victims, and 101 beds/101 units are dedicated to veterans.

Most homeless shelters in Pierce County do not require participation in Coordinated Entry when unsheltered individuals arrive; however, on-site staff connect homeless individuals to CE in shelters. While Pierce County's CE only assists literally homeless individuals or those fleeing or attempting to flee domestic violence, the decentralized nature of CE throughout Pierce County allows it to reach both sheltered and unsheltered homeless individuals. In addition, resources through the Rebuilding Hope! Sexual Assault center can connect victims to shelter resources. In example, the Sex Trafficking and Exploitation Program assists victims of sex trafficking with case management and navigation, leveraging community partnerships with shelter providers connect victims to shelter.

As CE clients enter, they undertake a motivational conversation with their case worker as part of the Diversion Program. Pierce County's Diversion Program empowers individuals to overcome their barriers to housing by coaching individuals to find a self-identified housing solution, and the program can assist individuals with small grants to support their housing solution. 40% of households in CE choose to divert, and around 50% of those who choose diversion are successful in finding housing using their identified housing solution. Those who achieve housing don't enter CE's housing prioritization pool for permanent housing. Chronically homeless households with Medicaid vouchers are additionally offered navigation services for the duration of their homeless episode.

CE connects homeless individuals to housing, including Pierce County's Transitional Housing, Rapid Rehousing, and Permanent Supportive Housing interventions. Across Pierce County's 121 Transitional Housing Units, 28 are family units, 22 are adult-only, and 71 are for Veterans. Across Pierce County's 726 Permanent Supportive Housing Units, 147 are family units, 544 are adult-only, and 35 are for Veterans. There are 187 other permanent housing units connected to the coordinated entry system, which include affordable rental housing. In addition, the PCHA's Emergency Housing Vouchers support diversion, emergency shelter, and rapid rehousing, while THA's support diversion and rapid rehousing, all distributed through the CE system.

Additional Tenant Based Rental Assistance is provided by the Public Housing Authorities and the County. THA has a total of 2,139 Housing Choice vouchers, 56 tenant protection vouchers, 125 FUPs, 75 foster youth to independence vouchers, 78 mainstream vouchers, 100 NED vouchers, and 219 VASH vouchers. THA also created programs with 130 vouchers that target recovering families, child welfare, and college assistance programs. Funding for these programs

comes from various funds and flexibility by being a move-to-work agency. PCHA currently has 2,617 vouchers across all voucher programs. Together, these are 4,756 vouchers that may be used in various locations in the Pierce County consortium of Cities and Towns. Furthermore, Pierce County has provided tenant-based rental and utility assistance to 9,128 households since 2021 using \$88.2M in pandemic-related assistance funds. The State of Washington has assisted in permanently supporting the program, which will receive \$8 million in 2022 and \$4 million every year thereafter. This program will provide households rent assistance, case management, legal services, and other wrap-around services. All these programs serve households with the highest housing insecurity and households at risk of homelessness.

In addition, the 2022 Pierce County Housing Needs Assessment shows that the housing stock available to those at risk of homelessness and in the highest need includes 9,092 units targeted to those priced to be affordable for households at 30% AMI and 22,891 rental units affordable for houses at 50% AMI.

Other services provided within the County include legal and fair housing assistance, provided in part by Tacomaprobono. Tacomaprobono serves households whose evictions, legal obligations or criminal convictions prevent them from finding housing, as well as those households facing both legal and illegal evictions. Additional services are provided by both nonprofits and public agencies specific to domestic violence victims and veterans.

Describe the unmet housing and service needs of qualifying populations:

(QP1) Homeless as defined in 24 CFR 91.5

&

(QP 3) Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

The Homeless Needs Inventory Gap Analysis uses May of 2022 HMIS data to identify the current housing needs necessary to serve Pierce County's homeless and domestic violence victim population. Pierce County's current temporary housing deficit is around 2,677 beds across 453 family units and 1,095 bed-only units. The method for deriving these estimates came from Pierce County's Comprehensive Plan to End Homelessness, which was written in 2021. The plan identified 2,287 individuals across 1,297 households just one year ago, revealing that the unsheltered homeless number has remained steady, and may have increased in this time. Furthermore, domestic violence service providers identified that they have up to 60 households at a time on their local waitlists for emergency shelter.

Furthermore, the plan identified that there would need to be a county-wide boost of funding from \$40M to \$157M per annum to reach the County's goal of functional zero homelessness. This investment would allow for responsive governance that will both work to prevent homelessness and immediately provide appropriate shelter and services to individuals who become homeless. In addition to higher operational costs, the increase in beds requires a substantial capital investment.

Once households are sheltered, they continue to face difficulties finding transitional, permanent supportive, and affordable rental housing. Households face individual administrative, geographic, social, and economic barriers. For instance, coordinated entry is limited to serving those who are literally homeless or fleeing/attempting to flee domestic violence. Furthermore, individuals who receive Emergency Housing Vouchers may need assistance that includes addiction counseling, life skill growth, and in finding an apartment and willing landlord. Individuals under 24 may not have specific programs that help develop their skills to achieve housing independently and permanently. Groups including women, BIPOC, LGBTQ+, people with disabilities, and religious minorities may choose to leave shelter before achieving housing due to unsafe conditions. Long wait times for permanent supportive housing and affordable housing unit stem from a mismatch in supply and demand.

Each of these situations described was directly identified in interviews conducted during the consultation phase. These situations point to the need for a more flexible shelter and housing system that allows clients the time to recover, supports them with robust service offerings, and helps them find housing in Pierce County's tight rental market. It also points out to the need for greater capital investment to expand the shelter system to fit the needs of the population, and for investment in the gap in affordable housing units.

(QP2) At Risk of Homelessness as defined in 24 CFR 91.5

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(QP4) Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Households at risk of homelessness and other at-risk populations have high needs for homeless prevention services such as having an accessible and appropriate affordable housing stock and programs that are directed to them. As shown in our affordable Housing Needs and Gap inventory, there is a shortage of 8,044 affordable housing units, specifically those targeting households earning under 30% AMI. This information is further supported by programs intended to assist households with the ongoing impacts of the COVID-19 pandemic while 18,600 households applied for the County's Rental and Utility Assistance program, only 9,128 have been able to be helped, over 2/3 of which were under 50% AMI.

If voucher value were increased, or if support services around them were created, many of these households could be assisted with vouchers. Tacoma Housing Authority (THA) identified around 1,700 households on their waitlist after they completed a recent waitlist cleanup, while Pierce County Housing Authority (PCHA) identified their waitlist as being around 8,000 households. However, waitlists do not accurately reflect community need. Actual need is much higher. Waitlists are filled from a lottery of eligible households, and only in years when the existing waitlists reach a threshold. Furthermore, households who receive assistance through the voucher program have increasing difficulty in utilizing them as rents have increased and the housing market supply has strained. In particular, it has been difficult for households to find correctly sized units in local submarkets dominated by single family homes that are typically 2- and 3-

bedroom. Recently, this market strain led PCHS to increase their Housing Choice Voucher Payment Standards to 110%, and 120% for the Emergency Housing Voucher Payment Standards. Their current utilization rate is 58%.

Once households can find housing, it is critical they have the funds and services to both sign a lease contract and maintain housing. Funds that cover applications, deposit, utility deposits and move-in assistance are repeatedly necessary for households with low incomes, as their ability to save for their next move is diminished through the high cost of living and low household income. Services that would help households maintain housing include adult education, financial literacy, ESL, daycare, and after school programs. A particular need for these support services was also identified for youth-led households (households under 24 years old).

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

Pierce County's Comprehensive Plan to End Homelessness discusses the importance of "building for zero" – a state where both shelter and a permanent housing intervention, such as permanent supportive housing, rapid rehousing, and affordable housing, are immediately available when a household enters homelessness. First, creating more shelter is necessary county-wide. Then, connecting households to a broad range of permanent housing options through coordinated entry, housing authorities, and service providers will allow for households to be permanently housed expediently.

The current gap in the shelter system requires approximately 2,677 additional beds across 1,584 units. The Comprehensive Plan to End Homelessness recommends investing in diverse models of shelter that will be appropriate to households of all backgrounds. By having a diverse set of shelter types, individuals such as LGTBQ+, women, BIPOC, and disabled individuals will be more likely to enter a shelter that meets their needs. Recommended forms of shelter include units in tiny villages (330 units, 600 beds recommended), hotel-based shelters (150 units, 300 beds recommended), congregate shelters (320 units, 430 beds recommended), safe parking (170 units recommended), safe encampments (550 units, 700 beds recommended), medical respite (25 units, 50 beds recommended) and young-adult shelter (45 units, 50 beds recommended). Furthermore, domestic violence providers and civil rights and disability service providers identified that non-congregate shelter was virtually always full. For example, the YWCA identified a revolving waitlist of around 60 to 100 households for their emergency shelters for domestic violence victims.

Stakeholders mentioned that there are currently few Medical Respite Shelter options to serve the qualifying populations. The 12 respite beds available in Pierce County require individuals to be referred by hospital staff upon discharge from a hospital stay, limiting who can be put into these beds. Furthermore, stakeholders mentioned that existing shelters are incapable of assisting households with treatment or management of medical conditions.

To move people from the shelter system into permanent housing requires an increased housing stock connected to CE, the housing authorities, and other service providers. The deficit in the affordable housing and permanent supportive housing stock is approximately 14,835 units targeted for households under 30% AMI and 19,500 units targeting incomes 30 to 50% AMI countywide.

The housing deficit creates additional difficulties in moving households out of emergency shelter, and for the success of TBRA programs. According to the Pierce County Housing Authority, additional housing units and services are needed to place households into long-term housing. First, the housing stock – reasonably priced 1-bedrooms are lacking due to a limited housing market dominated by single family homes. Second, there are difficulties successfully finding housing for voucher holders with addiction and mental health issues exiting the shelter system. These households require greater medical services and access to treatment in the community over both the short and long term, which points to a need for increased housing and shelter with these services, such as permanent supportive housing. In addition, many of these households face legal barriers that prevent them from attaining or remaining in housing. Public Agencies also identified that VA Supportive Housing voucher utilization is low due to a lack of affordable housing, rent costs, lack of willingness to use vouchers from landlords/property managers, property development plans not focusing on Veterans in plans, and VA case manager staffing shortages.

Stakeholders in the community also mentioned that young adults are facing difficulties starting households and acquiring housing when they need it, driving them towards homelessness. They primarily spoke to low incomes and lack of affordable and appropriate housing units to be the cause. Furthermore, some suggest that we lack a network of support services that would help youth achieve life skills and prevent future occurrences of homelessness.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Pierce County chooses to use definitions that do not differ from the HOME-ARP notice. The 2020-2024 Pierce County Consolidated Plan does point to cost-burdened households, particularly those under 50% AMI, as facing instability and an increased risk of homelessness; however, for the purpose of HOME-ARP there will be no preferences established based on AMI limits within the qualifying populations, nor will Pierce County seek to further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability” as established in the HOME-ARP Notice.

Identify priority needs for qualifying populations:

The priority needs for the qualifying populations are supported by both the data in the gap analysis and the community consultation. Priority needs include the creation of low-barrier interventions and services, and a capital development project with both additional shelter units and affordable housing units. In addition, it is critical that qualifying populations have access to a diversity of services that are specific to their need, such as medical respite care and navigation services.

The intention of the County is to serve each of these priority needs. In the context of the County's adoption of the Comprehensive Plan to End Homelessness, and other investments currently being made in affordable housing, low-barrier shelter, and navigation, HOME-ARP will best serve priority needs by being invested in a low-barrier non-congregate shelter with a medical respite component. This non-congregate shelter will have approximately 100 beds, with 50 beds serving all HOME-ARP qualifying populations, and the other 50 beds limited to those individuals who require medical respite care within the HOME-ARP qualifying populations.

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

Data was collected from the County's HMIS, a collection of supplemental data from consultation partners, outside data sources such as HUD's CHAS and U.S. Census Bureau's most recent ACS 5-Year Estimates, and the use of up-to-date county reports. The primary in-house report, Pierce County's Comprehensive Strategy to End Homelessness, was adopted by the County Council in March of 2022 and developed by a steering committee representative of governments, organizations, individuals with diverse backgrounds, and the lived-experience communities. Additional reports referenced included Pierce County's 2022 Housing Needs Assessment, 2020-2024 Pierce County Consolidated Plan, Rental and Utility Assistance Dashboard, 2021 Point in Time County, and the 2021 Continuum of Care Housing Inventory County.

HOME-ARP Activities

Template:

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

Pierce County will utilize open, competitive solicitations for applications through a Request for Proposals which will follow all HOME and OMB requirements, as well as State procurement rules and processes. They will be posted using public notice in the News Tribune and on Pierce County Human Service's webpage.

Information on the qualified populations, pertinent preferences, and program requirements will be included at the time of application solicitation, submission, and review as an exhibit in the Request for Proposals. The RFP itself will also include HOME-ARP language to ensure that all qualifying populations are served and no preferences between the qualifying populations are established.

Responses will be scored by Pierce County staff based on the applicants' ability to serve HOME-ARP Qualified Populations, organizational capacity to carry out the HOME-ARP plan and other federal requirements, ability to maintain the project long-term, partnerships with organizations to provide services, project readiness (including site control and financial readiness), and organizational risk.

The County will give preference to a non-congregate shelter project that demonstrates an intent and ability to be low-barrier, housing-focused, and serve all qualifying populations. Through this application process, the County will enable all qualifying populations to be served, with prioritization given based on need and best practices, while ensuring no violations occur regarding fair housing, civil rights, and other discriminations.

Describe whether the PJ will administer eligible activities directly:

Pierce County will not administer eligible activities directly.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

No administrative funds were provided to a subrecipient, nor shall funds be provided to a nonprofit for the purpose of operating or capacity building.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Template:**Use of HOME-ARP Funding**

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ -		
Acquisition and Development of Non-Congregate Shelters	\$ 4,473,639.25		
Tenant Based Rental Assistance (TBRA)	\$ -		
Development of Affordable Rental Housing	\$ -		
Non-Profit Operating	\$ -	0 %	5%
Non-Profit Capacity Building	\$ -	0 %	5%
Administration and Planning	\$ 789,465.75	15 %	15%
Total HOME ARP Allocation	\$ 5,263,105.00		

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

The requested amounts are based on input from the consultation meetings, public hearings, strategic plans, and data regarding the need of projects. Pierce County also considered the readiness and capacity of local agencies to undertake projects funded by the HOME-ARP program.

Staff further considered how HOME-ARP funds should be used in the context of implementing the County's strategic plans, including the County Comprehensive Plan, Consolidated Housing Plan, and the Comprehensive Plan to End Homelessness.

Activities taken by other County and State funders that will benefit HOME-ARP qualifying populations include nearly \$42.2 Million in ARPA funds allocated for development of affordable housing, the creation of a \$4 Million per annum permanent and flexible rental assistance program, \$1.5 Million to expand navigation services amongst all coordinated entry clients beginning in the third quarter of 2022, and a diverse capital project for expanded shelter capacities that includes hotel-based and tiny house units that includes nearly \$30M to house individuals currently in state-owned right aways.

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

The result of this planning process has led to the recommendations that HOME-ARP funds be used for non-congregate shelter in Pierce County, in particular for a project that would include 50 non-congregate shelter beds limited to medical respite care patients and 50 non-congregate shelter beds not limited to medical respite care patients. As identified throughout this plan, there are currently very few medical respite housing options within Pierce County that serve the qualified populations, despite the high need. Current data, input, and recent experiences in planning verified this ongoing need for medical respite housing.

Pierce County recognizes how other NCS would benefit qualified populations. Non-congregate shelter projects eligible for HOME-ARP, such as tiny house villages and former hotels, were identified throughout this process; however, those are already in development. Similarly, expanded services, affordable housing, and tenant-based rental assistance are provided for using other funds in the county.

Respite services in NCS will provide a singular opportunity within Pierce County for qualifying populations to receive respite care in a secure, low-barrier situation. The low barriers will allow for individuals referred from the community to be in respite care, whereas current options require a prior hospital stay. This new class of low-barrier shelter will bring Pierce County closer to goals set forth in the Comprehensive Plan to End Homelessness.

Furthermore, conversations with consultation partners reiterated the need to provide medical services to households. This included individuals from the Lived Experiences coalition, who identified that hospitals in Pierce County frequently discharge individuals quickly to the streets, and are limited in their ability to connect individuals to permanent housing or supportive services that assist individuals recover from illnesses, wounds, or addiction-related disorders when discharged.

In considering the HOME-ARP program and how a mixed respite and non-respite NCS shelter would serve all qualified populations, there was a recognition that this program provides a unique opportunity for Pierce County. In addition to providing medical care, the low barriers in an NCS setting will also allow for more equitable services, as special populations identified by consulting partners will be more comfortable staying in non-congregate settings.

HOME-ARP Production Housing Goals

Template

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

There are no affordable housing units that will be created. However, the HOME-ARP Program will serve as partial funding for the purchase of 100 NCS beds.

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

There are no affordable housing units that will be created. However, the HOME-ARP Program will serve as partial funding for the purchase of 100 NCS beds.

Preferences

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

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

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

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

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

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

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

Template:

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

There are no preferences established among the qualified populations. The referral method does not establish a preference among qualified populations, as any community service provider will be able to refer any person within the qualified populations to Respite Housing. If the Respite Housing is full, individuals will be added to a waitlist. In addition, individuals will be served first come, first served in the NCS beds without respite housing.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

There are no preferences established between the qualified populations.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a

project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

Template:

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

Referrals will be completed directly to the NCS project and will give households first come, first served service.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

Pierce County will not use Coordinated Entry as a referral to NCS funded with HOME-ARP funds.

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

Pierce County will not use Coordinated Entry as a referral to NCS funded with HOME-ARP funds.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

Pierce County will not use Coordinated Entry as a referral to NCS funded with HOME-ARP funds.

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Template

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

A limitation is established within the populations for households that qualify for medical respite care. This limitation only applies to the 50 medical respite NCS beds funded through HOME-ARP. While this limitation will ultimately be determined by the provider of respite care and facilities available on site, it will comply with fair housing rules and/or regulations.

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

The limitation is needed to effectively provide the medical and mental health care available in respite care facilities. This includes the service provider adequately staffing these 50 medical respite care beds with on-site nursing and certified mental health workers. These services are necessary and beneficial to the limited population, who may otherwise face housing and service barriers that limit their ability to recover from their qualifying medical need. This limitation is in concurrence with the overall goals of the County to increase and diversify low-barrier, accessible services to homeless individuals.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

While there will be a limitation based on medical need in the 50 medical respite NCS beds, the 50 non-respite NCS beds will serve all HOME-ARP qualifying populations. Having 50 NCS beds that are non-limited allows Pierce County to meet the requirement that HOME-ARP funds are used to serve all persons in the qualified populations.

HOME-ARP Refinancing Guidelines

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

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