

Prince George's County, Maryland

# HOME-ARP Allocation Plan

11-9-2022

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## Introduction

In response to the economic impacts of the COVID-19 pandemic, nearly \$5 billion in HOME Investment Partnerships Grants (HOME) funds were allocated to jurisdictions across the country through the American Rescue Plan (ARP). Prince George's County, Maryland (the County) was awarded a total of \$7,592,085 in HOME-ARP funds (see Appendix A). These funds may be used for the following activities:

- Acquisition, rehabilitation, and construction of affordable rental housing
- Supportive services, homeless prevention services, and housing counseling
- Acquisition and development of non-congregate shelter
- Tenant-based rental assistance
- Nonprofit operating and capacity building assistance
- Grant administration and planning

Complete information on eligible activities and qualifying populations can be found within the United States Department of Housing and Urban Development [Notice CPD-21-10](#).

Prince George's County Department of Housing and Community Development (DHCD) conducted an extensive series of consultations with stakeholders, including individuals who work directly with households who meet the criteria for the qualifying populations. Additionally, an extensive analysis of the qualifying populations and inventory of existing resources was completed. This HOME-ARP Allocation Plan outlines the research completed, as well as a summary of the activities that Prince George's County intends to implement with its allocation of HOME-ARP funds.

## Consultation

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

As detailed in the table below and in Appendix B, the County completed consultations with the required public and private organizations, as well as other key stakeholders, between March and June 2022. Consultations were completed in a combination of virtual meetings with individual organizations and focus groups with larger groups. The County also accepted written comments from organizations that were consulted. During all consultations, the County described the requirements and scope of HOME-ARP program rules - including funding availability, qualifying populations, and eligible activities - and solicited input and suggestions from key stakeholders.

The input received from these consultations informed the development of the HOME-ARP plan, including the uses of HOME-ARP funds and strategy for distributing HOME-ARP funds. The consultations also assisted the County in identifying existing resources, gaps, and needs of qualifying populations.

List the organizations consulted:

AGENCY/ORG	TYPE OF AGENCY/ORG	METHOD OF CONSULTATION
<b>Continua of Care Serving the Jurisdiction's Geographic Area</b>		
Prince George's County Continuum of Care	Continuum of Care	Virtual focus group
Prince George's County Department of Social Services	Continuum of Care coordinating agency	Virtual meeting
<b>Homeless Service Providers</b>		
Independence Now/ Center for Independent Living	Homeless service provider	Virtual meeting
Y.E.S. Committee for Homeless Youth	Homeless service provider	Virtual meeting
Mission First Housing Corporation	Homeless service provider	Virtual focus group
Pennrose Properties	Homeless service provider	Virtual focus group
Various members of Prince George's County Continuum of Care	Homeless service provider	Virtual focus group
<b>Domestic Violence Service Providers</b>		
Maryland Department of Housing and Community Development	Public agency administering rental assistance for victims of domestic violence (New Futures Program)	Virtual meeting
Glenarden Housing Authority	County-based public agency administering rental assistance and public housing for victims of domestic violence	Virtual meeting
Various members of Prince George's County Continuum of Care	Existing providers of services for domestic violence	Virtual meeting
Homes for America	Homeless and domestic violence service providers	Virtual meeting
Maryland Affordable Housing Coalition	Housing provider: statewide coalition	Virtual focus group
<b>Veterans Groups</b>		
Housing Authority of Prince George's County: VASH Program	County-based public agency administering rental assistance and public housing for veterans	Virtual meeting
Glenarden Housing Authority	County-based public agency administering rental assistance and public housing for veterans	Virtual meeting
Various affordable housing developers	Housing for veterans	Virtual meeting

<b>Public Housing Agencies</b>		
College Park Housing Authority	Public housing authority: municipality	Virtual meeting
Glenarden Housing Authority	Public housing authority: municipality	Virtual meeting
Housing Authority of Prince George's County	Public housing authority: County	Virtual meeting
Maryland Department of Housing and Community Development	Public housing authority: statewide	Virtual meeting
<b>Public Agencies that Address the Needs of the Qualifying Populations</b>		
Prince George's County Department of Social Services	Public agency: County Serves all four (4) Qualifying Populations under HOME-ARP	Virtual meeting
Maryland Department of Housing and Community Development	Public agency: State Serves all four (4) Qualifying Populations under HOME-ARP	Virtual meeting
Maryland Department of Disabilities	Public agency: State Serves all four (4) Qualifying Populations under HOME-ARP	Virtual meeting
Maryland Department of Health	Public agency: State Serves all four (4) Qualifying Populations under HOME-ARP	Virtual meeting
<b>Public/Private Organizations that Address Fair Housing, Civil Rights, and the needs of persons with disabilities</b>		
Independence Now/Center for Independent Living	Fair housing/persons with disabilities (advocacy and services)	Virtual meeting
Disability Rights Maryland	Fair housing/civil rights	Virtual meeting
Arc of Prince George's County	Fair housing/civil rights (advocacy and services)/persons with disabilities	Virtual meeting
Maryland Department of Disabilities	Persons with disabilities	Virtual meeting
Maryland Department of Health	Persons with disabilities	Virtual meeting
Various affordable housing developers	Housing for persons with disabilities	Virtual meeting

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

A summary of themes that informed the activities, preferences, methods of prioritization, and referral processes below is outlined below. Notes from each virtual meeting/focus group can be found in Appendix B.

#### *Lack of Deeply Affordable Rental Housing*

- There was a consistent reference to the general lack of deeply affordable rental housing, with the greatest need below 30% of the area median income (AMI). There was a consensus that the qualifying populations typically require housing that is affordable at or below 20% of AMI either through deep capital subsidy or rental subsidy.

#### *Need for Non-Congregate Shelter*

- Multiple respondents identified an overall ongoing need to increase capacity in non-congregate shelters. The County has a proven track record of securing funding necessary for capital and operating feasibility of non-congregate shelters, most notably during the pandemic. Although at the present time there is not an identified site or proposal for additional non-congregate shelter beds, many respondents noted that there are potential locations throughout the county.

#### *Capital Funding Should be a Priority*

- While there were some mentions of a need to expand rental assistance voucher programs (see notation below regarding victims of domestic violence), most respondents recommended using HOME-ARP funds as a capital source to fill gaps associated with renovating or building new affordable units for households at extremely low-income levels that are affordable without the need for rental assistance. Many respondents identified potential transactions that could benefit from gap funding to achieve feasibility.
- An affordable housing developer noted the need for the production of additional affordable senior housing, which has been difficult to finance over the past five years in light of State's Low Income Housing Tax Credit (LIHTC) scoring system which favors general occupancy housing.
- Affordable housing developers also noted the difficulties associated with adequately serving the County's significant population of undocumented residents.

#### *Qualifying Populations Require Enhanced, Long-Term Supportive Services*

- Multiple respondents highlighted the need for continued, long-lasting supportive services and targeted case management for vulnerable populations when they transition to transition to independent living, especially those involved in existing programs that match special needs populations with available housing.
- Several individuals noted that targeted case management is necessary to sustainably prevent - and respond to crises that can lead to - housing instability for qualified populations who have transitioned to independent living.
- Affordable housing developers noted that there are recently completed and pending rental complexes that include set-aside units for special needs and vulnerable populations. These households need access to and delivery of comprehensive support services to ensure their ability to live independently.

- An official from a neighboring county noted that those administering rental assistance voucher programs for vulnerable populations (e.g., Bridge subsidy, Section 811, New Futures, local programs, etc.) face broad-based challenges related to identifying and supporting members of vulnerable populations who are able to live in independent settings. A need for long-term availability of targeted case management to address crisis situations that threaten the housing stability of clients was identified.
- A member of the Continuum of Care noted that 80 medically frail individuals are currently residing in the system that need enhanced services.

#### *Permanent Supportive Housing is a Priority of the Continuum of Care*

- The Prince George's County Continuum of Care noted that permanent supportive housing (PSH) for the homeless is a priority for the following populations while elevating a recent significant increase in homelessness among the elderly/aging.
  - Unaccompanied youth/individuals exiting foster care
  - Returning justice-involved citizens
  - Veterans
  - Survivors/those fleeing domestic violence
  - Chronic homeless
  - Elderly/aging
- Most of the PSH resources in the county currently require linkage to a permanent rental assistance resource (tenant-based or project-based voucher). However, an alternative approach has proven successful in Maryland whereby sufficient capital subsidy is provided to allow a property owner to provide units at permanently restricted rents that are affordable to households with incomes at and below 30% of the AMI.
- In most cases, the preferred development approach is to integrate special needs/ supportive housing into larger developments that include affordable and unrestricted market-rate units.
- There is a large inventory of existing rental housing in the county that could potentially provide housing opportunities for vulnerable populations. The County's Right of First Refusal Program was highlighted as a potential resource for creating integrated, community-based housing opportunities.

#### *Existing Community-Based Resources and Transit Networks Are an Asset in Serving Vulnerable Populations*

- Several respondents involved in providing rental assistance and supportive services for vulnerable populations noted that the County's availability of transit options and community service are conducive to residents achieving and maintaining independence.
- Some respondents mentioned the need for financial support to deliver supportive services, but, with the exception of the aforementioned need for case management for currently housed vulnerable populations, was not identified as a priority given the availability of community-based services that are funded through other sources.

#### *Increased Transparency Needed in Allocation of Project-Based Rental Assistance*

- Affordable housing developers expressed a desire for enhanced coordination among County-level agencies in deploying incentives and other financial resources.

Specific reference was made to the need for greater clarity regarding the availability and process for securing project-based rental assistance through the Housing Authority of Prince George's County as a means to deliver housing to very low-income and vulnerable households.

#### *Youth Aging Out of Foster Care Require Housing Options*

- The YES Committee is a broad-based effort to create a housing/service center facility for youth exiting the foster care system. Multiple County agencies are working with the local foster care system and judicial system to identify a potential site, as well as needed capital, operating resources, and supportive service funding. In the meantime, efforts are focused on delivering rental assistance and supportive service supports to this population.

#### *Future Pipeline of RAD Projects from Public Housing Authorities Present Opportunities and Challenges*

- The Housing Authority of Prince George's County, College Park Housing Authority, and Glenarden Housing Authority are all working on conversions of their public housing portfolios through the federal Rental Assistance Demonstration (RAD). As a general matter, the county's housing authorities have taken time to respond to the incentives HUD is providing for RAD conversions and are now all on a similar timetable. This may result in a significant demand for capital and supportive service funding for these developments over the next five to ten years.
- Elderly and disabled populations are highly represented among the current tenant base in the properties identified for conversion; any redevelopments would result in improved living conditions for these residents.

#### *Victims of Domestic Violence Need Additional Housing Options*

The State Department of Housing and Community Development identified housing for victims of domestic violence as a priority. They identified rental assistance as an approach to enhancing housing support to this qualifying population.

## **Public Participation**

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: 8/11/2022

Public comment period: start date - 8/11/2022 end date - 8/25/2022

Date(s) of public hearing: 10/11/2022

Describe the public participation process:

In accordance with its Citizen Participation process, as established in Council Resolution CR-047-2020 which set forth the County's FY 2021-2025 Consolidated Plan, along with the County's FY 2021-2025 Citizen Participation Plan, Prince George's County published a summary of the proposed HOME-ARP Allocation Plan for public comment in two newspapers. The summary described the context and purpose of the Allocation Plan, as well as locations where copies of the entire document may be examined. Additionally, DHCD published a full draft of the plan on the Prince George's County website for review.



The draft HOME-ARP Allocation Plan was made available for public comment for a time period not less than 15 days (August 11 – August 25, 2022).

Additionally, Prince George’s County held a public hearing on the HOME-ARP Allocation Plan, scheduled by the County Council for Wednesday, October 11, 2022, at 10:00 A.M. The time, date, location, and subject of the public hearing were announced in newspapers of general circulation (i.e., the Enquirer Gazette and Prince George’s Post) within the County. DHCD issued a public notice notifying the public of the upcoming hearing with adequate advanced notice. While public hearings are typically held at accessible sites, convenient to potential and actual beneficiaries, the County Council is currently holding all public hearings virtually.

#### Describe efforts to broaden public participation:

To reach the Prince George’s County residents with limited English proficiency, DHCD endeavors to issue all of its public notices in both English and Spanish language. The public hearing notice for the HOME-ARP Allocation Plan public hearing was issued in both English and Spanish.

Additionally, DHCD informed members of the Housing Opportunities for All (Comprehensive Housing Strategy) Work Group about the public hearing. This workgroup represents a broad range of community leaders from across the County who are connected with a diversity of residents and other relevant stakeholders.

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

One comment was provided during the public hearing. The speaker was pleased that the Plan recognizes the need for long-lasting services and targeted case management services for vulnerable populations, something the speaker’s organization knows from their experience in direct services. The speaker also shared that they were supportive of the Plan allocating the majority of funding to long-term rental housing developments for extremely low-income households. They also recommended that the County consider adding an additional preference for individuals with disabilities.

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

The County is not accepting the recommendation that to add an additional preference for individuals with disabilities as the County has other resources dedicated to services and housing for individuals with disabilities.

## Needs Assessment + Gaps Analysis

#### Describe the size and demographic composition of qualifying populations within the PJ’s boundaries.

##### *Homeless Populations as Defined in 24 CFR 91.5*

The Prince George’s County Continuum of Care is coordinated by the County’s Homeless Services Partnership, a coalition of over 100 organizations working collaboratively to meet the needs of families and individuals experiencing homelessness. The Prince George’s County Department of Social Services serves as the Lead Administering Agency for the Continuum of Care, as well as the County’s Homeless Management Information System

(HMIS) Lead Agency. As such, it is responsible for collecting and maintaining all HMIS data, reporting, and related training. To track homelessness, the Continuum of Care uses data from Point-in-Time (PIT) count and the HMIS.

The Continuum of Care's [PIT count for January 27, 2021](#) found that there were 535 people experiencing homelessness that night. Within this group, 323 people (60%) were living in emergency shelters, 144 people (27%) were living in transitional housing, and 68 (13%) were unsheltered.

	Emergency Shelter		Transitional Housing	
	Number	Percent	Number	Percent
Household type				
Households without children	146	74.5%	22	35.5%
Households with at least one child and one adult	50	25.5%	40	64.5%
Households with only children	0	0.0%	0	0.0%
Total Homeless Households	196	100.0%	62	100.0%
Persons in each household type				
Persons in households without children	159	49.2%	22	15.3%
Persons age 18-24	17	10.7%	12	54.5%
Persons over age 24	142	89.3%	10	45.5%
Persons in households with at least one adult and one child	164	50.8%	122	84.7%
Children under age 18	95	57.9%	76	62.3%
Persons aged 18 to 24	18	11.0%	11	9.0%
Persons over Age 24	51	31.1%	35	28.7%
Persons in households with only children	0	0.0%	0	0.0%
Total Homeless Persons	323	100.0%	144	100.0%

Table 1. Sheltered Homeless Population (source: Prince George's County Continuum of Care Point-in-Time Count conducted January 27, 2021)

## Sheltered

During the January 2021 PIT count, the Prince George's County Continuum of Care counted 467 sheltered homeless people (258 households) - 196 households were in emergency shelters and 62 households were living in transitional housing. In both emergency shelters and transitional housing, there was a nearly even split between males and females, with zero people identifying as transgender or gender non-conforming.

## Emergency Shelter

According to the January 2021 PIT count, of those persons living in emergency shelters, approximately half were in households with adults only and half were in families with children. For those in adult-only households, nearly 9 out of 10 (89%) people were over the age of 24 whereas over half of persons in families with children were under the age of 18 (58%). Among those living in emergency shelters, 48 persons were chronically homeless, 13 were severely mentally ill, and 14 were veterans. Youth in emergency shelters were all ages 18-24, with 13 unaccompanied and seven parenting at least one child. Further analysis of PIT subpopulation surveys showed a nearly even split between males and females (53% and 47%, respectively). Eighty-six percent of persons living in emergency shelters identified as Black or African American and 12% identified as white (see Table 2).

The Prince George's County 2021 Consolidated Plan reports that the County is home to the largest number of veterans in the state. According to the January 2021 PIT count, there were 14 homeless respondents that were veterans, all of whom were living in emergency shelter. Veteran status was not collected for unsheltered respondents.

### ***Transitional Housing***

According to the January 2021 PIT count, most persons living in transitional housing were in families that included at least one child and one adult (85%); 62% of individuals in these households were children under 18. Individuals in households without children – including singles, couples without children, and groups of adults – comprised 15% of those living in transitional housing; twelve adults were in the 18–24-year range and 10 persons were over the age of 24. Within the group living in transitional housing, 90% identified as Black or African American.

	Emergency Shelter		Transitional Housing	
	Number	Percent	Number	Percent
<b>Ethnicity</b>				
Hispanic/Latino	22	6.8%	5	3.5%
Non-Hispanic/Non-Latino	301	93.5%	139	96.5%
<b>Total</b>	<b>323</b>	<b>100.0%</b>	<b>144</b>	<b>100.0%</b>
<b>Gender</b>				
Female	153	47.4%	75	52.1%
Male	170	52.6%	69	47.9%
Transgender	0	0.0%	0	0.0%
Gender Non-conforming	0	0.0%	0	0.0%
<b>Total</b>	<b>323</b>	<b>100.0%</b>	<b>144</b>	<b>100.0%</b>
<b>Race</b>				
Black or African American	278	86.1%	130	90.3%
White	37	11.5%	4	2.8%
Asian	1	0.3%	5	3.5%
American Indian or Alaska Native	0	0.0%	2	1.4%
Native Hawaiian or Other Pacific Islander	0	0.0%	0	0.0%
Multiple Races	7	2.2%	3	2.1%
<b>Total</b>	<b>323</b>	<b>100.0%</b>	<b>144</b>	<b>100.0%</b>

Table 2. Demographics of Sheltered Homeless Population (Source: Prince George's County Continuum of Care Point-in-Time Count conducted January 27, 2021)

### **Unsheltered**

Those identified as unsheltered are generally those living on the streets and in public places not meant for human habitation. These places can include parks, libraries, metro stations, shopping malls, churches, soup kitchens, and other public gathering spaces. Surveys of unsheltered persons are conducted by teams deployed into the community to locate and count them. There were 68 unsheltered homeless persons (64 households) counted and zero unsheltered families counted during the January 2021 PIT count.

### **Deep Dive: Youth**

During the January 2021 PIT count, there were 25 households of unaccompanied youth between the ages of 18-24. Out of these 25 households, 13 reported living in emergency

shelter and 12 reported living in transitional housing. The County's PIT count reported that 14 households in the count were parenting youth aged 18-24; half of these individuals lived in emergency shelter and half lived in transitional housing. This data point was not collected for unsheltered households.

The most recent study on the comprehensive needs and demographics of homeless youth comes from the County's [Coordinated Community Plan](#). This report contains data from a 2018 Youth REACH MD survey. While this report provides valuable context on the county's youth experiencing homelessness, it should be noted that the data was collected pre-pandemic.

Based on this data, 60% of youth from Prince George's County reported fleeing domestic violence while homeless and 14% of youth reported engaging in the foster care system. Additionally, there were 177 parenting youth experiencing homelessness.

#### *At Risk of Homelessness as Defined in 24 CFR 91.5*

In Prince George's County, the number of households with incomes below 30% AMI has grown in recent years. Comprehensive Housing Affordability Strategy (CHAS) data show that Prince George's County had an increase of households with incomes equal to or below 30% AMI between 2010 and 2018. As of 2018, approximately 13% of households had incomes equal to or below 30% AMI. Of these households, 63% were renters and 37% were homeowners (see Figure 1).

Per HUD standards, a household that spends between 30% and 50% of their monthly income on housing is considered "housing cost burdened," whereas a household that spends more than half of its income on monthly housing expenses is considered to be experiencing "severe housing cost burden." Per 2018 CHAS data, 35% of households were housing cost burdened or severely cost burdened in Prince George's County.

Lower-income households in Prince George's County experienced cost burdens at higher rates and more severely compared to higher-income households. Nearly 85% of extremely low-income households were either cost burdened (11%) or severely cost burdened (73%) (see Figure 2).

In addition to cost burden, there are other indicators that a person may become homeless. The first is households with more than two people living in a single room or studio housing unit. These households are experiencing extreme overcrowding, typically with precarious tenancy agreements, and the presence of other housing inadequacies such as a lack of kitchen or plumbing utilities. According to Census data, 87% of overcrowded households for all income levels are renter occupied. Another indicator of risk of homelessness is households with at least a 21-day eviction notice at the time they apply for housing support. These households have very limited time to secure housing and may become homeless while paperwork is being processed and an alternate unit can be found.

Both the number and proportion of people living in a unit with more than one HUD-defined housing problem (includes incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and cost burdens greater than 30%) have continued to increase. According to 2018 CHAS data, 38% of all households in Prince George's County were living in inadequate conditions. When focusing on extremely low-income households, the proportion increases, with over 84% of households earning less than 30% AMI living in

inadequate conditions. However, it is difficult to quantify the individuals and families in these unique scenarios due to limited data collection.

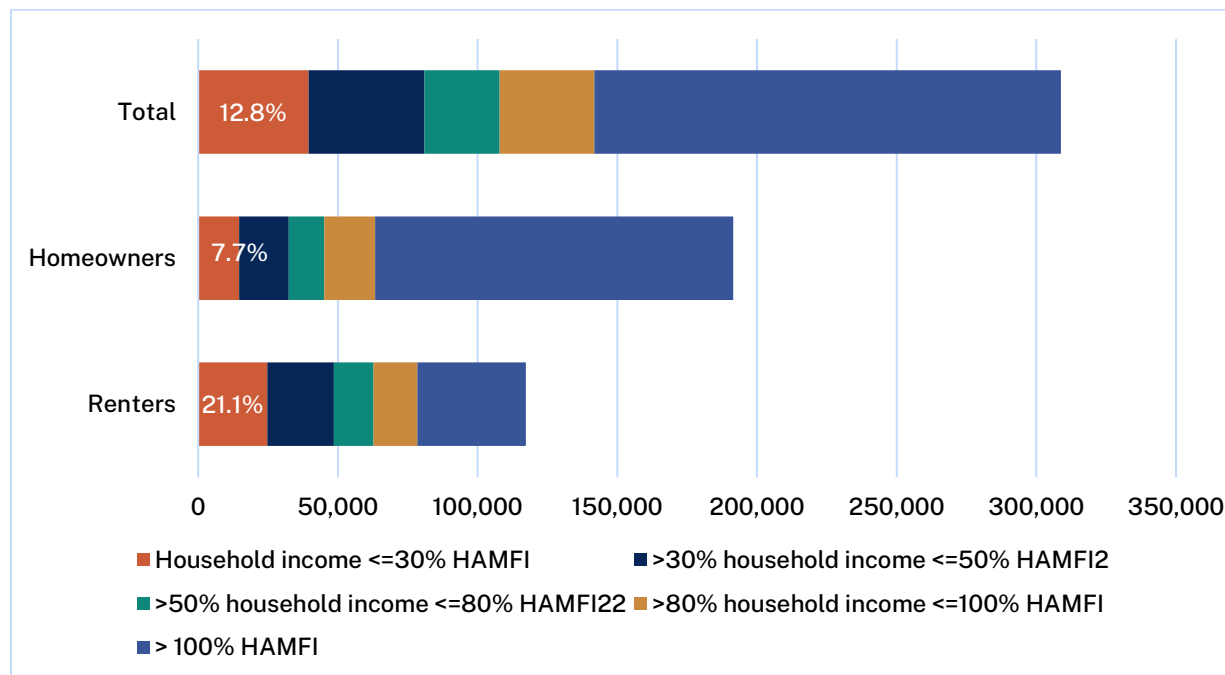


Figure 1. Income Distribution Relative to HUD Area Median Family Income (source: United States Department of Housing and Urban Development Comprehensive Housing Affordability Strategy data (2018))

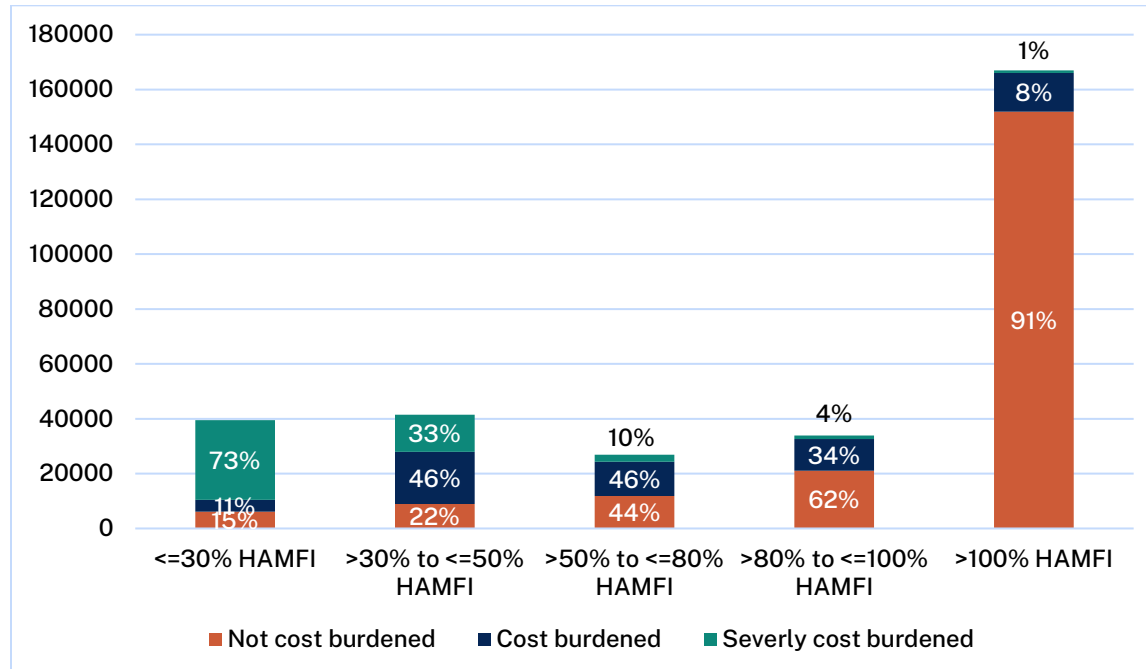


Figure 2. Housing Cost Burden by Income, Prince George's County (source: United States Department of Housing and Urban Development Comprehensive Housing Affordability Strategy data (2018))

### Lack of Sufficient Resources or Support Networks

Personal support networks include extended family, friends, or faith-based organizations that can provide temporary or permanent housing opportunities that reduce a person needing to go to an emergency shelter. Households without personal support networks are at-risk of becoming homeless, particularly when experiencing cost burdens or other housing problems. One way to examine this sub-population is to look at the scope of households who have applied for assistance through the County's Emergency Rental Assistance Program (ERAP), which provides funding for households most at risk of eviction.

Between March 2021 and September 2022, Prince George's County Department of Housing and Community Development provided emergency rental assistance to 9,377 households; 5,436 of these households reported incomes of less than 30% of the AMI. It should be noted that these households may not be counted as households with less than 30% of the AMI in the 2018 CHAS data due to COVID-19 impacts.

Households by AMI	Households Assisted	
	Number	Percent
Below 30% AMI	5,436	58%
30-50% AMI	3,019	32.2%
50-80% AMI	922	9.8%
Total	9,377	100.0%

Table 3. Households Assisted Through Prince George's County's Emergency Rental Assistance Program (source: Prince George's County Department of Housing and Community Development)

### *Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as Defined in 24 CFR 91.5*

According to the January 2021 PIT count, 16 respondents were survivors of domestic violence. Additionally, data from the 2018 Prince George's County Coordinated Plan on youth reports that 60% of youth from Prince George's County reported fleeing domestic violence while homeless. Beyond the homelessness system, the following county-level data on grounds for issuing temporary/final orders was made available in a January 2022 monthly report by the State of Maryland Administrative Office of the Courts:

Grounds	Count
Assault	48
Caused a fear of harm	44
Caused harm	3
Mental abuse of a child	1
Physical abuse of a child	1
Rape or other sexual offense or attempt	2
Sexual abuse of a child	2
Stalking	5
Statutory abuse of a vulnerable adult	1
Harassment	11
Malicious destruction of property	5
Trespassing	6
Total	129

Table 4. Grounds for Domestic Violence Related Orders (source: State of Maryland Administrative Office of the Courts, January 2022 Monthly Summary Reporting)

The grantee recognizes that these numbers only represent instances of domestic violence and stalking that have been reported. More detailed demographic data was not available.

Some additional data is available through the Prince George's County Family Justice Center (FJC), an initiative that was created to improve the legal system's response to those who have been impacted by domestic violence, sexual assault, human trafficking, and elder abuse. In FJC's FY 2019 report, which is the most recent available data, the FJC provided services for over 1,200 clients in Prince George's County. Eighty-three of those were provided with some form of shelter or housing. Additionally, 154 clients received some form of public assistance, which includes housing vouchers, though it is not explicitly stated how many vouchers were provided. Furthermore, 33 of their clients were referred to The NEHE Foundation, which provides emergency housing services for survivors of domestic violence. Fifty-nine were referred to the House of Ruth, a nonprofit that empowers women, children, and families to rebuild their lives and heal from trauma, abuse, and homelessness.

Data on human trafficking in Prince George's County is limited. However, 11 of FJC's clients were referred to Courtney's House, an anti-sex trafficking program which focuses on men and women aged 12-21. The National Human Trafficking Hotline publishes annual statistics and reported that 136 cases of human trafficking occurred in the state of Maryland in 2020. Women survivors represented 81% of the cases, and minors represented 30% of the cases. Demographics for race and ethnicity were not available.

*Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as Defined in 24 CFR 91.5* According to HMIS data from 2017 to 2020, there were 93 adults over the age of 60 years of age and with disabilities needing housing support services. Of the 93 adults, over 36% reported having a disability and had the longest length of stay in housing among older adults. Among the 93 adults, 70% of older adults were entering homeless situations, and 83% reported to be individuals rather than households. Only 10% of older adults reported successful exit from homelessness and, of those successfully exiting services, over 30% found housing support through emergency shelter. While the data highlights the state of older adult housing before the pandemic, the data indicates the growing need in the county for increased permanent housing support and residency services for older adults.

According to the CHAS (2018), there are approximately 74% of households with incomes equal to or less than 30% of HUD Area Median Family Income (HAMFI) are severely cost burdened (spend more than 50% of their income on housing costs). These households also struggle with housing problems with over 90% of households experiencing one of the HUD-defined housing problems according to 2018 CHAS data. As noted above, 2,652 households with reported incomes of 30-50% AMI have been assisted through the County's ERAP. However, additional data to quantify the sub-populations are not available at this time.

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:

### *Supportive Services*

The Homeless Services Partnership consists of 100 public and private groups, consumers, and individuals with diverse support service expertise. Continuum of Care services are navigable through a call center that connects people to programs throughout the county. The services available through the Continuum of Care include:

- on the street support services;
- 24/7 homeless support;
- homeless prevention services;
- emergency weather shelters including beds for most vulnerable populations;
- COVID-19 aid;
- transitional housing and rapid re-housing programs; and
- permanent housing support.

The County also has several organizations available to help families and individuals fleeing domestic violence transition to safe housing.

### *Homeless Housing Inventory*

As of January 2021, the County had:

- 478 total emergency shelter beds\* (166 for families)
- 146 transitional housing,
- 144 rapid re-housing beds (88 for families),
- 326 PSH beds, and
- 183 other permanent housing beds.

\*Includes 150 non-congregate emergency shelter beds were made available upon the onset of the COVID-19 pandemic that were not included in the 2021 Housing Inventory Count from Prince George's County

In 2022, the County added several programs to increase support to homeless persons. The County's Foster Youth to Independence program expands the housing opportunities for unaccompanied youth that have prior involvement in child welfare. Six Youth Homelessness Demonstration programs were established for youth, including a walk-in center, street outreach, joint transitional rapid re-housing, transitional crisis, and PSH support.

Local affordable housing providers and public housing authorities participate in a broad-based effort coordinated by the State of Maryland known as the [Maryland Partnership for Affordable Housing](#) to provide PSH in the County. This initiative provides targeted and coordinated rental assistance and housing placement support for vulnerable populations, especially the disabled and those transitioning from institutional settings to independent living.

### *Emergency Assistance*

Additionally, 139 Emergency Housing Vouchers were created and dedicated to households experiencing homelessness. 139 households in the County were awarded Emergency



Housing Vouchers and, as of May 2022, 75 households had secured leases with these vouchers. Emergency Housing Vouchers provide access to programs specifically available to voucher recipients, as well as strategically prioritized public and additional affordable housing programs.

The County DHCD continues to administer its ERAP. Between March 2021 and September 2022, 9,377 households were provided a total of \$91.2M in rental assistance (average of \$9,725 per household). The County provided an additional \$731.6K in utility assistance.

#### *Affordable Housing Development and Non-Emergency Rental Assistance*

Public housing authorities at the state, county and local levels provide tenant-based and project-based rental assistance, as well as public housing, to qualifying populations. These resources are an important element of the overall safety net but are insufficient to meet the overall need.

Describe the unmet housing and service needs of qualifying populations:

#### *Homeless*

##### **Housing and Shelter Units**

When examining the shelter universe through the high-level numbers in the gaps analysis table, there appear to be adequate resources. However, when considering the gaps analyses together with context from the consultations, nuances emerge.

Prince George's County has adequate beds and units to meet the needs of family households experiencing homelessness (as counted in January 2021). There is a surplus of beds and units available to provide families with emergency shelter and transitional housing services. The 2021 PIT survey counted 90 sheltered family households (including transitional housing units), a level of need addressed by the County's 40 units of transitional housing (121 beds), and 52 emergency shelter places (166 beds).

For homeless adults without children, the data indicate that resources are extremely tight and are not available to meet the long-term housing needs. Across the County, there are 312 beds for homeless adults in emergency shelters and another 25 in transitional housing. While these services respond to critical short-term housing needs, they do not provide longer-term housing stability that the County believes is essential to providing the housing stability essential to meeting the needs of homeless adults. A gap analysis of the total number of rapid rehousing, PSH, and other permanent housing shows that long-term housing options are limited, with only a two-unit surplus across the County when compared to the number of unsheltered households. Additional rapid rehousing, permanent housing services, and other non-congregate housing opportunities are critical – having surplus emergency shelter beds is important to be able to meet last minute needs and they should not be employed as long-term housing solutions due to limited permanent and rapid rehousing options for adults.

As noted in the consultation findings, stakeholders have cited a need for non-congregate shelter units, particularly for individuals and households who may have unique medical needs. Both the study and the Consolidated Plan from the County emphasize the need for more transitional and permanent veteran housing units. The 2021 County Consolidated Plan also identified a need for housing that is aware of accessibility accommodations

necessary for veterans with disabilities or veterans who are ineligible for housing that requires an honorable discharge.

The County Department of Social Services noted a 300% year-over-year increase in demand for services among the elderly. Other providers and members of the Continuum of Care concurred with the increase in demand among this population. A growing proportion of sheltered homeless households with elderly and disabled individuals are dependent on fixed incomes like Supplemental Security income and Social Security Disability Insurance. Permanent housing units, including assisted living facilities for elderly and disabled persons, must be flexible to the fixed incomes of the growing population of elderly renters and housing voucher recipients.

There is also a need for housing services that support the physical accessibility and mental health needs of individuals and families who are elderly or have disabilities. A 2019 PIT count from the County's Consolidated Plan reported that severe mental illness and physical disability were the two largest barriers to permanent housing and independent living for single adults. More wrap-around services for mental illness and disabilities in housing support are critical in transitioning more households to permanent housing.

Finally, Prince George's County lacks transitional housing units dedicated to unaccompanied youth, including parenting youth; there is also a lack of transitional housing units for parenting youth aged 18-24.

### **Case Management**

Beyond shelter, intensive case management was identified as service need for the Homeless qualifying population, including those in integrated housing settings. Additionally, the 2021 Consolidated Plan from the County reported that all federally funded services for veterans are located outside of the county, identifying the County's need for more centralized veteran services for residents.

### *At Risk of Homelessness AND at Greatest Risk of Housing Instability*

#### **Affordable Rental Housing**

Prince George's County lacks enough rental homes priced for extremely and very low-income renters. There are more extremely low-income renter households in the County than there are affordable rental units. This reiterates the lack of supply for the deeper affordable housing and the limited diversity of supply in the county for those in most need (see 3).

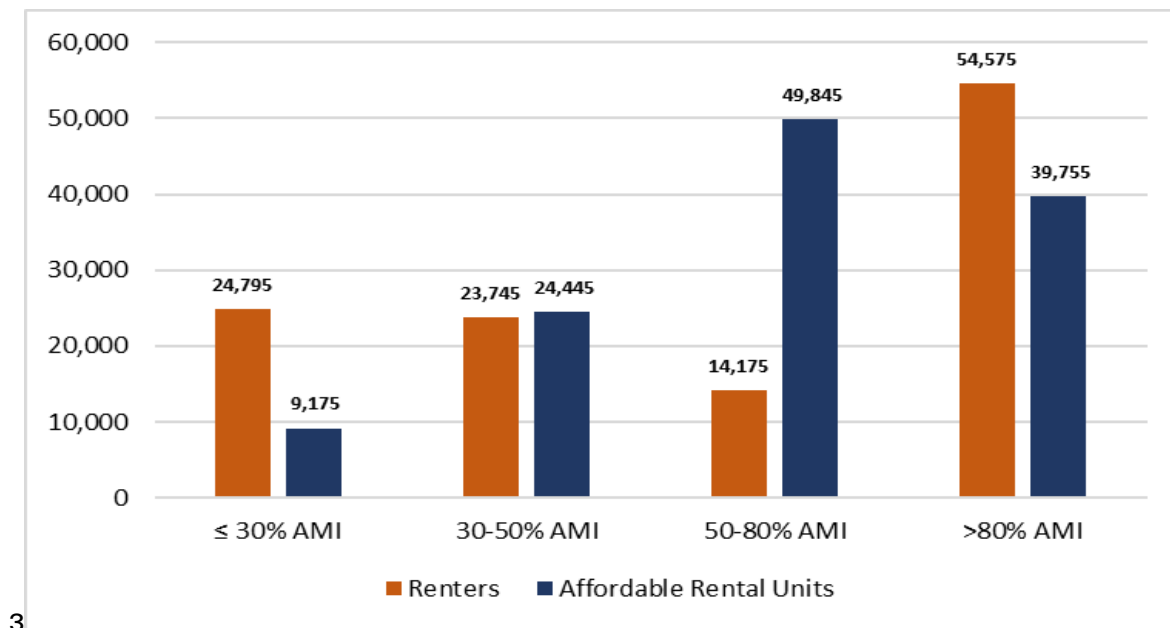


Figure 4. Unmet Needs for Rental Units Priced by Income (source: HUD CHAS (2018))

### Housing for Specific Populations

There are 914 individuals who are on the Prince George's County Section 811 waitlist maintained by the Maryland Department of Disabilities. 601 of these individuals (66%) have indicated an interest in being placed in housing in Prince George's County; included in this amount are 398 individuals (44% of the total) who currently reside in the County.

- 139 of the 601 total need a stepless, ramped, or flat entry for their unit
- 167 of the 601 total need physically accessible housing
- 9 indicated a need for a unit accommodating individuals with hearing impairments
- 32 indicated a need for a unit accommodating individuals with vision impairments

Consultations with community service providers in the County's coordinated Community plan also emphasized the need for housing options specifically for youth aging out of foster care. Statements of housing needs for youth formerly engaged in foster care identifies similar needs described in the Coordinated Community Plan's 2018 analysis of youth housing needs.

### Emergency Financial Assistance

Residents in these two qualifying populations would benefit from increased emergency housing assistance resources; for those who are facing eviction or have recently been evicted, rental, security deposit, utility, and legal assistance resources can be critical.

### Supportive Services

Case management can help households navigate the complex housing resource ecosystems, as well as other critical social services

*Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as Defined in 24 CFR 91.5*

A 2019 study from the National Alliance of Safe Housing (NASH) identified barriers for survivors beginning the process in seeking housing needs. Most respondents from the

study found out about domestic violence resources primarily through law enforcement or the court system. Transportation to providers was a barrier for respondents when seeking initial resources.

The NASH study reported that admission into housing services could be exclusionary for victims of domestic violence. Admission policy barriers included: alienating intake questions about a survivor's trauma or immediate safety; lack of bilingual support staff; and requirements for survivors to have protective orders. According to the State of Maryland's Administrative Office of the Courts (January 2022), only 26% of domestic violence protections in Prince George's County were issued out of 332 domestic violence protection petitions. 127 reasons – or 51.8% - of reasons for dismissal of domestic violence protection orders were from failure to appear in court. The State's report reflects difficulty for Prince George's County residents to attain protective orders from the courts. These barriers inhibit a survivor's ability to seek immediate safety and housing in the County.

NASH's 2019 study also reported an overall lack of housing units available to domestic violence survivors and limited implementation of protection policies for survivors living in Low Income Housing Tax Credit residences. With limited availability in units for survivors or policies to ensure survivor protection in housing, survivors are vulnerable to losing housing support from providers or safety from immediate harm.

Domestic violence survivors in Prince George's County often encounter barriers when searching for safe and secure housing. Reported barriers include limited housing options for female-headed households with more than two children or male children over 12 years old; a lack of pay stub or proof of work experience; move-in costs; and household furnishings for a family. For residents fleeing domestic violence or similar threats, access to financial resources to support a safe move is limited; leaving under duress can limit the amount of time and resources available to ensure safe and secure housing.

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

The County utilized PIT and Housing Inventory Count data to conduct the homeless gap analysis. The number of PSH, rapid rehousing, and other permanent housing units were compared with the number of households counted during the PIT count.

Additionally, the County Department of Social Services and the Continuum of Care have identified an overall, ongoing need for 300 beds of capacity in non-congregate shelters. There is a strong desire to increase the overall capacity of non-congregate shelter beds, and the County has a proven track record of securing funding necessary for capital and operating feasibility.

	Current Inventory	Level of Need	Gap
	# Of Units	# Of Households	# Of Households
Total Rental Units	123,220		
30% AMI Units	9,175		
50% AMI Units	24,445		
0-30% AMI Renter HH with 1 or more severe housing problems		20,875	
30-50% AMI Renter HH with 1 or more severe housing problems		21,355	

Overall gap			-8,610
30% AMI gap			-11,700

Table 5. Non-Homeless Housing Gaps

CHAS data were utilized to complete the non-homeless needs inventory and gap analysis; the County compared the number of units affordable to households with very- and extremely-low incomes with the number of households in those income brackets who were also facing at least one severe housing problem. The greatest need is for households with incomes equal to or less than 30% of the AMI. When comparing the number of units affordable to households with incomes equal to or less than 30% of the AMI with the number of households with incomes equal to or less than 30% of the AMI who have one or more severe housing problem, there is a gap of 11,700 units.

	Homeless																
	Current Inventory							Homeless Population						Gap Analysis			
	Family <sup>a</sup>		Adults Only <sup>b</sup>		Chronic <sup>c, d</sup>	Veteran <sup>d, e</sup>	Youth <sup>d, e</sup>	Family Households	Adult Households <sup>f</sup>	Chronic	Veterans	Victims of Domestic Violence	Youth <sup>g</sup>	Family		Adults Only	
	# Of Beds	# Of Units	# Of Beds	# Of Units	# Of Beds	# Of Beds	# Of Beds							# Of Beds <sup>h</sup>	# Of Units	# Of Beds	# Of Units
Emergency Shelter	166	52	162	162	n/a	6	28										
Transitional Housing	121	40	25	25	n/a	0	26										
Permanent Supportive Housing	183	53	143	143	158	2	0										
Rapid Rehousing	88	29	56	56	n/a	0	0										
Other Permanent Housing <sup>i</sup>	148	61	35	35	n/a	0	0										
Sheltered Homeless (Includes transitional)								90	168	48	14	6	39				
Unsheltered Homeless <sup>j</sup>								0	64	n/a	n/a	n/a	n/a				
														133	53	2	2

Table 6. Homeless Housing Gaps (sources: Prince George’s County 2021 Continuum of Care Housing Inventory Count; Prince George’s County 2021 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations Count; Homelessness in Metropolitan Washington: Results and Analysis from the 2021 Point in Time Count of Persons Experiencing Homelessness)

Notes:

- a) Family Units and Family Beds categories include units and beds for households with one adult and at least one child under age 18
- b) Assumes that the number of beds is equal to the number of units for non-family counts
- c) Chronic Beds include beds in Permanent Supportive Housing dedicated to serve chronically homeless persons
- d) Chronic, Veteran and Youth beds are subsets of Total Bed Inventory
- e) Veteran Beds and Youth Beds, respectively, include beds dedicated to serve homeless veterans and their families, and include beds dedicated to housing homeless youth aged 24 and younger.
- f) Includes single adults, adults couples with no children, and groups of adults
- g) Includes Unaccompanied Youth and Parenting Youth ages 0-24
- h) Estimates for total Family Bed calculation: (number of family households x the average family household size) – (sum of Family Beds in Permanent Supportive Housing, Rapid Rehousing, and Other Permanent Housing)
- i) Other Permanent Housing (OPH) consists of Public Housing - Housing with Services (no disability required for entry) and Public Housing - Housing Only, as identified in the 2020 HMIS Data Standards
- j) In 2021, HUD gave communities the option to cancel or modify the unsheltered survey portion of their PIT counts based on the potential risk of COVID-19 transmission through conducting and in-person survey. Figure provided is the total of unsheltered households, reflecting that household type and disaggregated subpopulation data were not included in the 1/27/2021 PIT survey.

### Identify priority needs for qualifying populations:

Prince George's County has identified the following priority needs: 1) non-congregate shelter units, 2) deeply affordable rental housing, and 3) long-term supportive housing services, such as case management support for qualifying populations. These needs are reflected in the needs assessment in different ways for each qualifying population.

Expanded non-congregate shelters can provide households who have intense service and/or medical needs safe, quality shelter to as they transition into affordable housing units (whether dedicated units or naturally occurring affordable housing), as well as access to case management services that address risks to housing stability such as domestic violence, fixed income, or mental illness.

Additionally, increasing the supply of dedicated affordable housing for very- and extremely-low income residents is critical. 3 of the needs assessment demonstrates the County's need to expand deeply affordable housing opportunities. With 44% of the homeless adult housing units consisting of temporary housing units (including emergency shelter and transitional housing beds), more permanent housing options are needed for those exiting homelessness, as well.

Not only do households in unstable housing situations require units to secure permanent long-term housing, but many qualifying populations also require specialized and trauma-informed case management support to address the unique and occasionally similar needs of each population such as benefits support, childcare service referrals, or mental health services. Case management services can offer vital referrals to resources outside of housing providers that can prevent future housing instability upon settlement in a permanent housing unit.

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

The County considered findings from the consultations alongside the data analyses outlined above to identify gaps and prioritize needs. As the County's Continuum of Care is prioritizing the development of deeply affordable rental housing paired with support services, the number of unsheltered homeless individuals was compared with the number of transitional and permanent housing units. See the notes beneath Table 6 on page 25 for details on how the gaps were calculated.

The needs for non-congregate shelter units emerged through consultations with key stakeholders, including members of the County's Continuum of Care. Low-barrier temporary units are critical.

Preventing homelessness for those who may face housing instability is also paramount. The County assessed this by comparing the number of very- and extremely-low income households with severe housing issues and the number of units affordable to very- and extremely-low income households.

Recognizing the limitations of these gaps analyses and available data to quantify the qualifying populations, it remains clear that Prince George's County faces an affordable housing shortage – for those who are currently housed and homeless alike.

Another consistent theme was the need to connect residents with supportive services to increase housing stability. Case managers are crucial to supporting residents by connecting them with relevant wrap-around services.

## HOME-ARP Activities

### Allocations

Based on key findings from the consultations, needs assessment, and gaps analysis, Prince George's County proposes funding three activities, in addition to grant administration and planning. Please see [Table 7](#) below for a summary of the proposed allocations. The funding allocations are within HOME-ARP statutory limits.

ACTIVITY	FUNDING AMOUNT	PERCENT OF THE GRANT	STATUTORY LIMIT
Supportive services	\$1,029,835		
Acquisition/development of non-congregate shelter	\$835,274		
Development of affordable rental housing	\$4,588,164		
Admin + planning	\$1,138,812	15%	15%
Total	\$7,592,085		

Table 7: Summary of Proposed HOME-ARP Allocations

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients, and/or contractor: The County's DHCD will release a public notice of funding availability (NOFA) that complies with all HOME-ARP regulations.

Developer applications will be scored based on a number of factors, potentially including:

- Leverage for HOME-ARP funded units (i.e., project-based rental assistance, coordination with the Prince George's County Continuum of Care, other public and private funding)
- Financial feasibility of total development
- Developer experience
- Proximity to transit
- Sustainable design, energy efficiency, and green design standards

A separate NOFA will be made available for the acquisition or development of non-congregate shelter units. Similarly, the applications will be scored based on a number of factors, potentially including:

- Leverage (i.e., coordination with the Prince George's County Continuum of Care, other public and private funding)
- Financial feasibility
- Developer experience
- Proximity to transit
- Sustainable design, energy efficiency, and green design standards



Regarding the selection of a non-profit supportive service provider, DHCD will release an open request for qualifications for case management services for eligible residents residing in the affordable rental units.

Describe whether the PJ will administer eligible activities directly

DHCD will manage the rental housing development and non-congregate shelter activities, as they manage other local, state, and federal funding sources. As noted above, the Department will select qualified development partners.

Prince George's County Department of Housing and Community Development will select a third-party or several third parties to administer the supportive service activity.

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

N/A

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

### *Supportive services*

To promote housing stability, allocated funding for supportive services will be used specifically for case management services for residents who meet the criteria of a qualifying population who are living in affordable rental units that are funded with HOME-ARP funds.

Based on input from an expert at the Maryland Department of Disabilities, the estimated cost on an annual basis to deliver targeted case management services to 20-30 PSH units would range from \$168,000 to \$300,000.

### *Non-congregate shelter*

According to the HOME-ARP Notice, "(a) non-congregate shelter is one or more buildings that provide private units or rooms as temporary shelter to individuals and families and does not require occupants to sign a lease or occupancy agreement." Through the pandemic, providing non-congregate shelter units proved to be an effective approach to reducing the number of unsheltered residents in Prince George's County. As noted above, the County has concluded there is an ongoing need for 300 non-congregate shelter beds for various populations and seeks to use HOME-ARP funds to support acquisition and development of additional non-congregate shelter capacity to fill this need.

These funds may be used for an entity to acquire an existing non-congregate shelter or to develop new or additional non-congregate shelter units. The Prince George's County Continuum of Care noted that while other funding resources exist to support the operations of non-congregate shelters, there is limited funding for acquisition and development. The County demonstrated the ability to provide operating and supportive service support for non-congregate shelters during the pandemic. At the present time, there is not an identified site or specific proposal for additional non-congregate shelter beds the County is considering allocating these dollars to.

### *Development of affordable rental housing*

There is a significant need for rental housing that is affordable to households with very low and extremely low incomes, including those who meet the criteria for HOME-ARP qualifying populations. While units will be open to all qualifying populations, they will be underwritten to extremely low-income affordability assumptions to ensure they are financially viable for the life of the program.

The County's primary goal for the use of HOME-ARP funding when supporting deeply affordable rental housing is to focus on the creation of units that can retain long-term affordability (40 years) without the need for rental assistance, if needed. Additionally, the County seeks to create deeply affordable rental units that have supportive services.

Utilizing a model that the Maryland Department of Housing and Community Development has been using for a number of years, affordable housing developers will be incentivized to dedicate a portion of units in their respective multi-family rental developments as affordable for those in the qualifying populations. This model encourages mixed-income development and advances a more integrated approach to housing for the qualifying populations, who otherwise may live in more segregated environments.

Under this approach, deeply affordable rental units with supportive services can be affordable (typically at 10-20% of AMI) and available for a 40-year period without the need for rental assistance. While this approach requires deep capital subsidies and up-front funding of operating reserves, it has proven to be a cost-effective approach that allows for the use of scarce rental assistance resources elsewhere.

This approach also aligns with other County planning efforts, including the County's Housing Opportunity for All Comprehensive Housing Strategy and County Executive's Economic Development Platform, which sets a target of increasing affordable rental opportunities.

This approach does not preclude the County from pursuing opportunities to link long-term, project-based rental assistance with PSH. If such rental assistance opportunities present themselves, the County will make every effort to leverage this important source of support.

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

The needs assessment and gaps analysis demonstrated a need for increasing the supply of deeply affordable rental housing, as well as non-congregate shelter units. Furthermore, the consultations elevated a need for case management that will help households gain housing stability.

While there are seemingly adequate emergency shelter units based on the 2021 inventory and PIT, households need safe, quality permanent affordable housing opportunities to transition to after accessing emergency and/or transitional housing. Additionally, the non-homeless gaps analysis demonstrates a significant need for deeply affordable housing units, especially for those with incomes equal to or less than 30% of the HAMFI.

Furthermore, understanding the size of the population at-risk of homelessness, including those living in substandard or crowded housing, as well as trends in rising housing costs, increasing the number of deeply affordable quality units is the top priority. While scaling up the number of units for formerly homeless households and/or households facing instability, there is a parallel need for greater investment in case management to support the eligible tenants of the units to be funded with HOME-ARP to promote greater housing stability.

Though resources exist for the operations of non-congregate shelters, HOME-ARP is a unique federal funding source that allows for the acquisition and development of non-congregate shelter units. Members of the County's Continuum of Care highlighted the ongoing need of 300 non-congregate shelter beds.

## **HOME-ARP Production Housing Goals**

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

As noted above, the County's primary goal in using HOME-ARP funds for affordable rental housing is to create PSH that is affordable for a period of 40 years without the need for long-term rental assistance support. This approach, which has been used successfully across the State of Maryland, provides a set-aside of deeply affordable units that are affordable for households with incomes as low as 10-20% of AMI, typically within larger affordable housing developments. The approach involves a high level of up-front capital subsidy and the creation of an internal operating reserve that enables property owners to successfully operate units with rents that are well below the incremental operating cost.

In estimating unit production with this approach, the County examined its existing pipeline of 17 projects seeking affordable housing resources to arrive at an average total development cost of \$262,373 per unit. This figure is based on the allowable development costs under HOME-ARP, which are more flexible than typical HOME funds. The existing pipeline includes both new construction and acquisition/rehabilitation developments, as well as a mixture of unit types, including one, two and three-bedroom units, so a variety of potential housing typologies will be possible for qualifying populations.

For financial modeling purposes, the County assumed that HOME-ARP funds would cover 80% of this per unit capital cost, with the remaining 20% leveraged from other available affordable housing resources. This results in a need for \$209,898 of HOME-ARP funds for the development cost portion per affordable housing/PSH unit.

The County also assumed that each unit supported with HOME-ARP funds would require an up-front funding of a \$45,000 per unit operating reserve, which is equal to \$250 per unit per month for a 15-year period. These funds are necessary to cover the gap between operating costs (i.e., maintenance, administration, etc.) and actual tenant rent at the 10-20% AMI range.

Combined, the HOME-ARP support needed for each unit would be estimated at \$254,898 (\$209,898 + \$45,000).

Using this approach, it is estimated that a total of \$4,558,164 of HOME-ARP funds would be needed to produce a total of 18 affordable units for qualifying populations.

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

The County will target the HOME-ARP funds that are dedicated for affordable rental housing to produce deeply affordable housing for qualifying populations. The estimate of 18 units produced is based on the most conservative analysis that involves the need to deeply subsidize capital costs and fund an operating reserve so that units can be leased to a qualifying household without the need for rental assistance.

It is the County's hope that additional capital resources can be leveraged (or rental assistance secured) that will enable the overall number of units produced using HOME-ARP funds to be increased. However, it is important that even at the most conservative production level of 18 units, these HOME-ARP assisted units will provide critically needed housing for a period of at least 40 years without the need for additional ongoing subsidy from the County.

## Preferences

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

For rental housing developments, Prince George's County will give preferences to households within the following Homeless qualifying sub-populations for the affordable rental housing and non-congregate shelter activities.

First preference:

- Households who are eligible for HOME-ARP funded housing under the Homeless Qualifying Population as defined by 24 CFR 91.5 Homeless (1); AND
- Households who have been identified as having severe service needs

Second preference:

- Households is eligible for HOME-ARP funded housing under the Homeless Qualifying Population as defined by 24 CFR 91.5 Homeless (1);
- Households who have NOT been identified as having severe service needs; AND
- Households who have been living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least six months OR has experienced three occasions in the past three years of living in one of these locations

Third preference:

- The household is eligible for HOME-ARP funded housing under the Homeless Qualifying Population as defined by 24 CFR 91.5 Homeless (1);
- The household has NOT been identified as having severe service needs; AND
- The household has been living in a place not meant for human habitation, a safe haven, or in an emergency shelter for less than six months OR has experienced less than three occasions in the past three years of living in one of these locations

**Fourth preference:**

- All other households who eligible for HOME-ARP funded housing under the Homeless Qualifying Population as defined by 24 CFR 91.5 Homeless (2), or (3)

For non-congregate shelter, there is a preference for households who are eligible for HOME-ARP funded housing under the Homeless Qualifying Population as defined by 24 CFR 91.5 Homeless (1) who have severe service needs.

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

The need for stable housing for individuals experiencing homeless, especially those with severe service needs and those are chronically homeless, emerged during consultations and through the needs assessment. Numerous service providers and the CoC noted that individuals with severe service needs are not well served by congregate emergency shelters and are very vulnerable when unsheltered. Throughout the consultations, it was also raised that it is a priority of the County to provide more permanent housing opportunities to those within the homeless service system, opening up units for currently unsheltered residents.

Prince George's County's Continuum of Care will apply its Coordinated Entry Policy to HOME-ARP funded units, including use of the Composite Score and By Name list approach. The 2022 policy includes a method of prioritization specifically for HOME-ARP funded rental (see Appendix C). For the non-congregate shelter units, a method of prioritization will be created that prioritizes individuals with severe service needs.

This approach will allow the households in the homeless qualifying population to move to stable permanent rental housing or non-congregate shelter in line with the Continuum of Care's policies.

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

All rental units funded with HOME-ARP will be open to all qualifying populations. The coordinated entry policy for rental units funded with HOME-ARP codified this, as well.

If the PJ intends to use the coordinated entry (CE) process established by the Continuum of Care, 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:

All qualifying populations are served by the County's Continuum of Care and coordinated entry process.

## Limitations

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:

**The PJ does not intend to limit eligibility for rental housing or non-congregate shelter activities to the homeless qualifying population.**

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

N/A

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):

N/A

## HOME-ARP Refinancing Guidelines

N/A

## **Appendices**

## Appendix A: Award Letter





OFFICE OF COMMUNITY PLANNING  
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-7000

April 28, 2021

Ms. Angela D. Alsobrooks  
County Executive of Prince George's County  
14741 Governor Oden Bowie Drive  
Upper Marlboro, MD 20772-3043

Dear County Executive Alsobrooks:

I am pleased to inform you of your jurisdiction's Fiscal Year (FY) 2021 allocation for HUD's HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) funding. The American Rescue Plan appropriated \$5 billion to help communities provide housing, shelter, and services for people experiencing and other qualifying populations. These HOME-ARP funds are in addition to your regular FY 2021 HOME formula allocation. This one-time funding creates a significant opportunity for you to meet the housing and service needs of your community's most vulnerable populations.

Your jurisdiction's FY 2021 HOME-ARP allocation is \$7,592,085.

HOME-ARP funding gives jurisdictions significant new resources to address their homeless assistance needs by creating affordable housing or non-congregate shelter units and providing tenant-based rental assistance or supportive services. Later this year, the Department will issue an implementing notice providing guidance on HOME-ARP, including instructions and requirements for developing a substantial amendment to your jurisdiction's FY 2021 Annual Action Plan describing your proposed use of the funds. HOME-ARP funds are available for expenditure until September, 2030.

HOME-ARP funds are allocated through the HOME formula to all participating jurisdictions that qualified for an annual HOME Program allocation for FY 2021. HOME-ARP funds must be used for individuals or families from the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability; and veterans and families that include a veteran family member that meet one of the preceding criteria.

HOME-ARP funds can be used for four eligible activities including the production or preservation of affordable housing; tenant-based rental assistance; supportive services, including homeless prevention services and housing counseling; and the purchase or development of non-congregate shelter for individuals and families experiencing homelessness. Additionally, HOME-ARP provides up to 15 percent of the allocation for administrative and planning costs of the participating jurisdiction and for subrecipients administering all or a portion of the grant. HOME-ARP can provide up to 5 percent of the grant for operating costs of Community Housing

Development Organizations (CHDOs) and other non-profit organizations, including homeless providers. Additional funding is available to these organizations for capacity building. Like other formula grant funds, HOME-ARP funds will be administered in the Integrated Disbursement and Information System (IDIS).

While your jurisdiction will not have access to HOME-ARP funds until HUD has issued an implementing notice and subsequently reviewed and accepted a substantial amendment to your FY 2021 Annual Action Plan, I urge you to begin consulting with homeless service providers, domestic violence service organizations, public housing agencies, and other organizations and agencies that assist qualifying populations in your area. Early identification of the unmet needs among these populations and consideration of potential uses of HOME-ARP funds will position your jurisdiction to design and implement its HOME-ARP Program expeditiously.

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The Office of Community Planning and Development looks forward to working with you to ensure the success of this critical program. If you or any member of your staff have questions, please contact your local CPD Office Director.

Sincerely,

A handwritten signature in dark ink, appearing to read 'James', with a stylized flourish at the end.

James Arthur Jemison II  
Principal Deputy Assistant Secretary  
for Community Planning and Development

## Appendix B: Consultation Notes

Prince George's County Continuum of Care / Various Attendees

6/8/2022

- Development of non-congregate shelter was mentioned as a priority for multiple participants; the need for such a facility was evidenced during pandemic, especially among the chronically homeless and families.
- Big need for non-congregate shelter for medically fragile and behavioral health populations to fill the gap between in-patient and independent living settings.
- Additional need for supportive services.
- Huge need for shelter services for medically frail; 80 consumers in system. Regular shelter beds are not appropriate for medically-frail; non-congregate shelter would be optimal.
- Additional need for mental health and behavioral health consumers/populations.
- Permanent Supportive Housing should also be a priority, with linkage to non-congregate shelter which would identify consumers ready for PSH.
- Increased supportive services are needed for returning citizens since stay longer in shelter due to difficulty finding independent living.
- Operator of local young adult shelter becoming aware of enhanced need for behavioral health and mental health populations.
- For youth without MH or BH issues, life skills and related services are needed to make transition to independent living.
- Shelter in Beltsville undergoing strategic step down as pandemic and related funding ends; new alternative setting needs to be identified. Beltsville location replaced church-based, rotating shelter which was less expensive, but provided less capacity.
- Senior population is increasing in shelters. Seniors need enhanced services. Shepard's Cove noted increase in 65+ women. County DSS noted 300% increase year-over-year in Point in Time count. Reference to "senior blitz" survey from several years ago.
- DSS believes County does good job serving homeless veterans; additional capacity for this population is not viewed as a priority.
- Need for staff training to effectively support medically frail populations; other non-CoC resources at County could provide this training.
- Tenant-based rental assistance is needed for medically frail and those with behavioral health conditions. Many in Rapid Recovery program are not qualifying for PSH because not classified as chronically homeless. DSS notes that this population is a priority of CoC, so can serve this population with PSH.
- Undocumented refugee populations via Resettlement Agency (current priority is Afghan refugees) need support. Currently 1520/1600 are located in County.
- Coordinated Entry system discussed. About 2-4 openings for PSH every month does not meet demand. Current approach requires permanent rental subsidy due to high rents.
- HOME-ARP not available for operating expenses of non-congregate shelter; this is not a huge barrier to enhanced **NON-CONGREGATE SHELTERS** since other resources are available in County to support **NON-CONGREGATE SHELTERS**.

- Domestic violence populations have evictions on record making difficult to qualify for new housing. Provide support to clients and potential landlords. Landlord incentives are not a clear-cut eligible use with HOME-ARP.
- Need for support for clientele with lower levels of mental health conditions that are not caught by current system.

Maryland Department of Health / Marianne Graham  
5/13/2022

- Oversees Money Follows the Person (MFTP) program.
- Lots of contacts for people who want to move to Prince George's County, but not a lot of resources.
- MFTP and Bridge subsidy for three years for residents transitioning from institutions, nursing homes, and state residential facilities.
- Work with local housing authorities and Maryland Department of Housing and Community Development (DHCD).
  - Prince George's County is popular because of public transit, access to services, density of population.
- Partner with Maryland DHCD, Department of Disabilities under 811, Weinberg programs.
  - Most 811 units in County are filled.
  - Primary opportunities are now at turnover (death eviction, etc.).
  - 811 units are project-based. 325 statewide with another 100 or so on the way. Most are fully leased.
- Case managers assigned but sometimes residents decline.
- Make referrals to Centers for Independent Living.
  - Voucher referrals
  - Legal aid referrals
- Need more deeply affordable and accessible units.
- Short-term case management for stability is a strong need.

Maryland Affordable Housing Coalition / Various Affordable Housing Companies  
5/6/2022

- Strong need to create deeply affordable, permanent supportive housing for the homeless.
- Funding needs to include supportive services across all age groups.
- Strong demand for capital funding to write-down rents without the need for rental assistance. Even with deep capital subsidy, there is a need for additional subsidy for operations/services to achieve long-term sustainability for vulnerable populations.
- Need to enhance supportive service connections for residents in targeted units.
- Pursue pairing HOME-ARP funds with units that have project-based rental assistance but need to understand priorities of Housing Authority of Prince George's County. Issues such as Site and Neighborhood Standards.
- Gating issues for residents referred via continua of care and HUD.
  - Most vulnerable populations have complicated mental health/ emotional issues.
  - Case management support needs to be enhanced.
  - Need to have realistic expectations regarding failure.

- Challenge the notion that all units must serve the most vulnerable; there needs to be targeted matching of units to individuals/families with ability to live independently with supports.
- Senior housing is a huge need. Hasn't been a priority with State Low Income Housing Tax Credit program in recent years.
- Immigration status will influence decisions to pursue support and housing. Programs need more flexibility regarding immigration status.
- Rental assistance programs should be created. Consider modeling on DC Local Rent Supplement Program (LRSP) with wrapped supportive services.

Maryland Department of Disabilities / Chelsea Hayman

5/16/2022

- Deeply affordable housing is very scarce and in strong demand.
- Tenant-based voucher assistance trend for clientele to enable mainstreaming. Also work on 811/ Weinberg project-based approaches.
- Established relationships with public housing authorities via referrals.
  - Ongoing challenge is finding adequate units within payment standards.
  - Accessibility is addition issue in finding acceptable units.
- Strong demand for behavioral health services, especially within older buildings in public housing authority portfolios.
- Housing Authority of Prince George's County also under voluntary compliance agreement/settlement agreement facilitated by HUD/ Disability Rights Maryland to deliver additional accessible units for public housing residents and voucher recipients.
- General need for behavioral health services and securing financing to deliver services over the long term, especially those services not paid through traditional channels. Strong need for ongoing/ targeted case management not covered under Medicaid waivers.
- Additional services gap for residents transitioning from facility-based setting (i.e., nursing home, rehab center, etc.) to independent living, especially when moving to a new jurisdiction. Need to re-establish connections with services during this transition.
- Case management services currently covered by Medicaid, etc. typically expire upon determination that independence has been achieved. There is a need for continued case management services (at a less intensive level) to avoid/ prevent destabilizing events, especially among residents needing ongoing psychiatric care and therapy.
- Seeking to create ongoing supportive services program using case management staff to connect with residents every two weeks using Money Follows the Person funding.
- Already a significant amount of constituent outreach in Prince George's County. Most common inquiry from constituents is housing, so strong relationship with County and housing authorities is key.
- Seek to place constituents in independent living which provides lower cost level of care and greater independence.
- County is "popular" among constituents due to transit opportunities. Housing affordability is an increasing challenge as pricing increases in neighboring jurisdictions.
- More engagement with Continuum of Care is needed.
- Management of waiting lists; staying in contact is a challenge.

- County should target HOME-ARP funds to the “pain points” such as achieving full accessibility of units from the outset.

Prince George’s County Department of Social Services / Renee Ensor-Pope  
3/16/2022

- County priority is to incentivize cross-system utilization and bring capacity to scale.
- 10-year plan to end homelessness wrapped up in 2021. Standing up process for community engagement to craft 2022-2031 plan is underway.
- Silver tsunami leading to increasing needs for seniors. Added seniors to five previously identified priority sub-populations (in non-priority order): 1) unaccompanied youth <25; 2) returning citizens; 3) veterans; 4) domestic violence; 5) chronically homeless.
- Need for assessment of info for immigrant (especially Latino) populations.
- Elderly population needs support with activities of daily living in some cases.
- Lack of accessible housing alternatives for individuals with disabilities who are experiencing homelessness.
- Surge of returning citizens due to efforts to discharge from correctional facilities during pandemic. This led to integration into the community a lot of individuals without a plan.
- Increasing rents in County is exacerbating challenges.
- Tremendous need for deeply affordable housing (<30% AMI) that is affordable to clients without need for rental assistance. Lack of permanent housing is a huge stumbling block.
- Non-congregate shelter is needed at a manageable scale/lesser density. Should pursue opportunity to acquire a facility (a la a hotel) by using Housing Authority of Prince George’s County or housing authority funds to acquire. Secure project-based rental assistance, match with HUD funding, re-allocate current funding being used for leases for additional services and assistance.
- Looking at hotel sites in south County, working with County Central Services to identify other potential sites. Housing Authority of Prince George’s County owns land which could be a site.
- Some services can already be paid for by State/Federal funding under provisions of Medicaid waiver.
- General need to think differently about how to house people permanently while recognizing that the emergency need will always be there.
- Looking at system integration with Housing Authority of Prince George’s County.

Independence Now / Sarah Basehart  
5/20/2022

- Independence Now is the designated Center for Independent Living (CIL) for Prince George's and Montgomery Counties.
- Receive many calls from persons with disabilities seeking housing.
  - Calls include working age with a wide range of disabilities (sensory, physical, emotional).
  - Many callers are in crisis or first-time and without case managers.
- Work with State Department of Disabilities on 811 and Weinberg programs to provide housing support to lowest income disabled households.
  - These rental assistance/ placement programs are critical in Prince George's County since Housing Authority of Prince George's County waiting list for vouchers has been closed for past 7-8 years.
- Worked with County Department of Social Services to deploy about 100 emergency rental assistance vouchers for the homeless.
- Medicaid waiver provides for home care services in community for former nursing home residents after 30 days; housing availability is the barrier for this population.
- Connections with Independence Now are via word of mouth, agency referrals, mental health system. About 20% of consumers are homeless.
- Consumers also include populations that are reluctant to contact public agencies, such as non-citizens.
- Searching for housing that meets voucher standards is very difficult. Several years ago, major issue was accessibility; today the challenge includes finding rents that meet payment standards.
- Need to make sure there is accessibility to public transit.
- Also work with renters and homeowners to do accessibility modifications to units.
- Strong advocacy role. Have been involved with Housing Opportunities for All initiative since outset.
- Peer-based approach with 80% of staff having disabilities.
- Ongoing case management support for residents is a big issue, especially for those with significant behavioral health issues. Significant unmet need to keep households stabilized over the long term. Most services are associated with initial stabilization. Working on securing Medicaid funding for case management for 811 and Weinberg units.

ARC of Prince George's County / Robert Malone and staff  
5/31/2022

- Have been in touch with Housing Authority of Prince George's County since last year regarding voucher RFP, but group homes are not eligible.
- Currently have state and federal funding for residential and community supports at 40+ group homes where ARC pays rent.
- New waivers to allow residents to live outside group home setting.
  - Independent living with drop-in support.
- Community-based locations getting more expensive due to rising rents.
- Seeking locations near public transit. Primary demand comes from within County, although some consumers are seeking to relocate to the County.

- Maintain waiting list for developmental disability services, including dual diagnosis with mental health. Some referrals must be relocated out of state due to lack of options.
- Strong demand for in-home accessibility modifications, especially among the elderly.
- Alternative to group homes emerging. Supportive living model pays for “just what you need” services delivered in-home with funding provided via State. Community Pathways Waiver.
- Immigrants /non-citizens reluctant to seek housing and social services.
- Funding needs:
  - Rental assistance vouchers for disabled, especially in group homes
  - Drop-in supports
  - Accessibility improvements for existing group homes.

Disability Rights Maryland / David Prater

6/1/2022

- Voluntary compliance agreement and settlement agreement with Housing Authority of Prince George’s County.
- Relief includes 69 new accessible units with project-based vouchers for deep rental subsidy.
  - Current status is 0 units; some units in development pipeline so numbers should begin trending upward soon.
  - Housing Authority of Prince George’s County issued RFP two years ago for existing Low Income Housing Tax Credit applicants with some success.
- For all qualified populations, there is a strong need for project-based rental assistance to achieve permanent housing.
- Tenant selection criteria and occupancy criteria determine by owner who is awarded project based vouchers. Some parameters on location of units based on public transit access, dispersal within county.
- New construction is not an absolute requirement to achieve relief goals. Scattered site is also a possibility, though new construction provides greater flexibility in achieving UFAS, which provides enhanced accessibility beyond Fair Housing Act standards.
- Reducing concentration away from Low Income Housing Tax Credit “super sites” could be a good policy decision.
- Housing Authority of Prince George’s County also set up Modification Fund for tenant-based voucher recipients to deal with reasonable accommodations. Putting more funding into fund would be good.
- Housing Authority of Prince George’s County has less than 400 units; vouchers at 6,000+
- Voucher discrimination among private landlords appears to be a common issue in County. Some basic fair housing and legislation/education would make sense.



Glenarden Housing Authority / Sharon Land  
4/22/2022

- 60 public housing units.
- 16 for seniors/disabled.
- 44 for families.
- Serve County's most needy/vulnerable.
- Have received Commitment to Enter into a Housing Assistance Payments (CHAP) from HUD for redevelopment of public housing.
  - Undergoing physical needs assessments.
  - Goal is to transition via RAD from public housing units to project-based Section 8 rental assistance.
- ROSS coordinator indicates strong demand for supportive services among residents, especially victims of domestic violence and mental health populations. Domestic violence appears to have increased during the COVID-19 pandemic. Need a voucher program or referral option for DV.
- Receive limited inquiries from veterans (typically homeless veterans).
- Need greater availability of supportive services.
- 75-80% of phone calls / inquiries are from homeless.
  - Make referrals to Department of Social Services.
  - Engaged with Continuum of Care.

College Park Housing Authority / Michelle Johnson and Arelis Perez  
3/17/2022 and 3/23/2022

- Seniors and disabled are residents in Attick Towers, which is only public housing in portfolio.
- No voucher program administered.
- Working on Rental Assistance Demonstration conversion for Attick Towers.
- Work with Agency Disability Committee for College Park and meet once a month. Close collaboration with County Department of Social Services.
- Need for wrap-around services.

Housing Authority of Prince George's County / Karanja Slaughter, Crystal Ford, Denise Haffenden  
5/2/2022

- Veterans Affairs Supportive Housing (VASH) vouchers for veterans in County, DC, VA under partnership. 150 vouchers are set aside with coordination via County Department of Social Services.
- Need a bigger allocation for veterans that have nothing to do with Veterans Affairs because some vets do not meet requirements if not in good standing or had a dishonorable discharge.
- Major Rental Assistance Demonstration initiative underway for multiple (five) public housing properties in portfolio. Significant elderly and disabled presence in public housing.
- All preference populations under HOME-ARP are residing in public housing and voucher programs.

- Newly implemented family supportive services program to assist with underemployed, disabled, domestic violence.

Maryland Department of Housing and Community Development / Greg Hare and Alvin Lawson

4/28/2022

- Act as public housing authority for entire state. Some voucher households port into Prince George's County from other parts of the state.
- Oversee contract administration for project-based Section 8 developments in County.
- VASH initiative for veterans in Eastern Shore and Western Maryland primarily.
- Move-up Initiative provides rental assistance to transition out of PSH to free up units.
- Disabled and homeless served via Money Follows the Person/Bridge Subsidy/Weinberg programs.
  - Involves coordination/partnership with Housing Authority of Prince George's County.
  - 811 does not involve public housing authorities.
- Domestic violence rental assistance via New Futures Program.
  - Targets DV survivors as well as youth aging out of foster care.
  - Substantial number of participants in Prince George's County.
- State HOME-ARP goals are focusing on Weinberg program to use capital to drive down rents, building momentum of Shelter and Transitional Housing Facilities Grant Program, capital gaps for multifamily deals, and other Continuum of Care priorities.

Bridgewater Real Estate / Adam Stein and Tim Sabet

5/10/2022

- Working with Baywoods, single owner of multiple hotel properties that could be suitable for non-congregate shelter.
- Owner is patient and has two properties under contract (College Park and Silver Spring). College Park property provides good opportunity for seniors.
- Additional hotel property located in Camp Springs is available. In discussions with Community Crisis Center which is currently renting hotel units in multiple locations and looking to consolidate into one location.
- Owner has agreed conceptually to sell for \$8 million or lease for \$1.3 million per year.
- Community Crisis Center model provides several months of housing for clients to achieve stability; current location ends July (Beltsville?).

Y.E.S. Committee / Representatives of various public and non-profit organizations  
4/29/2022

- Targeting development of facility for youth aging out of foster care who are at risk of homelessness. Anticipate development/construction of facility is two years out.
- During interim, focus on development of multi-service center to be operational for delivery of services for current population and future residents of housing.
- Discussed Family Justice Center development and financing process.

Homes for America / Dana Johnson  
6/7/2022

- Developed and operate Restoration Gardens for youth aging out of foster care. Model requires full time case manager for 43 units.
  - Cost of \$50k-\$60k/year for staff position.
- Current property manager and service provider being replaced. New case management provider is Springboard Case Management.

Also operate with ½ FTE case manager for Broadway scattered site development which has 10 sites and 50 households. Less vulnerable population than Restoration Gardens.

## Appendix C: Prince George's County Continuum of Care Coordinated Entry Policy

## **Prince George's County Continuum of Care Coordinated Entry Policy**

### **1. Introduction**

The CoC Interim Rule defines several responsibilities of a Continuum of Care in §578.7(a)(8). One of these responsibilities is to establish and operate either a centralized or coordinated assessment system, in consultation with recipients of ESG program funds within the geographic area. This coordinated entry/assessment system provides an initial, comprehensive assessment of the needs of individuals and families for housing and services. The Prince George's County Continuum of Care (CoC) has developed the following Coordinated Entry Policy as written standards for providing assistance using McKinney-Vento Homeless Assistance funds in accordance with the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act CoC Program Interim Rules. As part of the Prince George's County Continuum of Care (MD-600) all Homeless Services Partnership (HSP) member agencies and organizations must participate in the process and accept housing referrals from the Coordinated Entry System.

A coordinated entry/assessment system is defined to mean a coordinated process designed to coordinate program participant intake, assessment, and provision of referrals. To meet basic minimum requirements, the CoC's coordinated entry system must:

- Cover the entire geographic area of the County,
- Be easily accessed by individuals and families seeking housing or services,
- Be well advertised,
- Include a comprehensive and standardized assessment tool.

The CoC is required to establish and consistently follow written standards for providing assistance. At a minimum, these written standards must include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid re-housing assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance;
- Policies and procedures that ensure assistance is provided fairly and methodically; and
- Policies and procedures to ensure continuous coordinated entry system performance, including implementation of HUD's Coordinated Entry data elements to standardize data collection on core components of coordinated entry -- access, assessment, prioritization, and referral.

Coordinated Entry systems are important in ensuring the success of homeless assistance and homeless prevention programs in communities. In particular, such assessment systems help communities systematically assess the needs of program participants and effectively match each individual or family with the most appropriate resources available to address that individual or family's particular needs.

Prince George's County's Coordinated Entry process is designed to identify, engage, and assist homeless individuals and families and ensure those who request or need assistance are connected to proper

housing and services. Coordinated Entry will ensure that the people who receive housing are the ones who are most in need, not those who are the easiest to serve.

There are three core components to the Coordinated Entry system:

1. Standardized access to housing programs
2. Standardized Assessment that prioritizes people with the longest histories of homelessness and the most extensive needs
3. Coordinated referral that ensures persons are housed as appropriately as possible in the least restrictive environment

## **2. Overview of the Coordinated Entry System**

Most communities, Prince George's County included, lack the resources to meet the needs of all people experiencing homelessness. By utilizing Coordinated Entry, the County ensures that households experiencing homelessness receive the level of assistance that is most appropriate to resolving their homelessness, and that households with the most severe service needs are prioritized for assistance and receive it in a timely manner. Severe service needs are defined as at least one of the following: repeated incidents of emergency department (ED) use (defined as more than four visits per year) or hospital admissions, two or more chronic conditions as defined in §1945(h)(2) of the Social Security Act, or frequent and repeated incarceration for crimes related to homelessness i.e. trespassing, public urination.

Key elements of Coordinated Entry are:

- Designated Coordinated Entry staff who facilitate housing referrals within the CoC and have the management responsibility to implement the day-to-day workflow of the process;
- Use of standardized assessment tools to assess client needs;
- Prioritization of clients with the longest time homeless and the most barriers to returning to housing;
- Referrals based on the results of the assessment tool(s) to homeless assistance programs, mainstream services, behavioral health providers, and other appropriate programs;
- The use of a By Name List which documents all literally homeless persons within the CoC (whether they are sheltered or unsheltered) and a Prioritization List made up of clients referred by all Access Points, all clients who meet the HUD definition of "chronically homeless", and all unsheltered individuals known to DSS Street Outreach;
- Documentation of vulnerability scores, ranking on the priority housing list, referrals, etc. in HMIS or other shared database to ensure transparency;
- Regular (bi-weekly) Coordinated Entry Prioritization Team meetings that include representatives from Emergency Shelter (ES), Joint Transitional Housing/Rapid Rehousing (TH-RRH), Rapid Rehousing (RRH), and Permanent Supportive Housing (PSH) providers, Behavioral Health, DSS Street Outreach and other Access Points and CoC housing providers; and
- A Coordinated Entry Steering Committee made up of a relatively small group of executive-level decision-makers from the major providers and/or funders of housing or services and mainstream service providers which meets at least quarterly and is responsible for:

- Policy oversight: establishing and reviewing policies, procedures and performance benchmarks, measuring performance and identifying system gaps;
- Evaluation responsibility to assess the performance of the system and create a feedback loop for policy oversight;
- Conflict Resolution and Coordination of funding resources; and
- Drafting interim amendments to the Coordinated Entry Policy which are needed to address unexpected circumstances, and which will be approved by the CoC at the next meeting of the Homeless Services Partnership and incorporated (if necessary) into the next update to the Coordinated Entry Policy.

The implementation of coordinated entry is a national best practice. When implemented effectively, coordinated entry can:

- Reduce the number of phone calls people experiencing homelessness must make before finding crisis housing or services;
- Reduce new entries into homelessness through coordinated system-wide diversion and prevention efforts;
- Prevent returns to homelessness by placing people in appropriate housing that meets their needs;
- Reduce or remove the need for individual provider wait lists for services;
- Foster increased collaboration between homelessness assistance providers;
- Improve a community's ability to perform well on Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act outcomes and make progress on ending homelessness;
- Target limited funding to achieve maximum results.

## **Nondiscrimination**

All housing assistance made available through the Prince George's County CoC is available to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability and without regard to actual or perceived sexual orientation, gender identity, or marital status and must comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws in accordance with 24 CFR 5.105 (a) including, but not limited to the following:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status;
- Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance;
- Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin under any program or activity receiving Federal financial assistance; and
- Title II of the Americans with Disabilities Act prohibits public entities, which includes state and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing-related services such as housing search and referral assistance. Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

## **Data Management/Privacy Protections**

The coordinated entry process is designed to ensure adequate privacy protections of all participant information. The CoC has written policies and procedures for obtaining participant consent to share and store participant information for purposes of assessing and referring participants through the coordinated entry process. These are detailed in the Prince George's County's HMIS Policies and Procedures Manual, which is hereby incorporated into this policy.

### **Training**

The CoC will provide training protocols and at least one annual training opportunity to participating staff at organizations that serve as access points or otherwise conduct assessments. The purpose of the training is to provide all staff administering assessments with access to materials that clearly describe the methods by which assessments are to be conducted with fidelity to the CoC's coordinated entry process, including its written policies and procedures and any adopted variations.

### **Evaluation**

The Coordinated Entry Steering Committee is responsible for developing and updating written procedures that describe the frequency of and method used for evaluations of the Coordinated Entry System as required by HUD, including how many participants will be selected and the process by which their feedback will be collected, and must describe a process by which the evaluation will be used to update existing policy and procedures. Evaluations will be conducted bi-annually and will be designed to answer the core questions:

- Does the CoC's implementation of coordinated entry efficiently and effectively assist persons to end their housing crisis?
- Are the housing and services interventions in the CoC more efficient and effective because of coordinated entry?

### **Marketing & Education**

In order to reach all County residents who may be in need of services, the CoC affirmatively markets housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, sexual orientation, gender identity, gender expression, age, familial status, or actual or perceived disability. The CoC utilizes a number of means to disseminate information about the county's coordinated entry system and educate potential users of the system, as well as agencies and service providers who may work with people who are experiencing or at-risk of homelessness. Special outreach and marketing campaigns utilizing radio, social media and print media have been designed and are utilized to reach specific subpopulations including domestic violence survivors, transition aged youth, and veterans.

The County's homeless hotline is featured prominently on the county's website as well as being listed in area service guides, and posted in day centers, social service offices, public library branches, and PG Parks Recreation Centers throughout the county. The street outreach team works closely with area emergency rooms, Fire/EMS mobile integrated health, crisis response teams, public safety agencies, and public libraries to ensure that they are knowledgeable about the county's coordinated entry system and how to help someone access it. Coordinated Entry staff attends cross-disciplinary meetings with the Departments of Health, Corrections, Education, Social Services, specialty courts, and domestic violence



and veteran service providers in order to identify potential system users and to ensure that information on how to access services is well known throughout the county. Additionally, public events which serve individuals who are homeless or those at risk of homelessness (like the annual Point in Time enumeration, holiday food and gift giveaway, and Veteran Stand Down/Homeless Resource Day) are advertised widely on social media, in newspapers, and on local radio stations. DSS keeps a record of these marketing activities.

### **3. Coordinated Entry System in Prince George's County**

#### **Access, Initial Contact, and Engagement**

The County has a 24/7 homeless hotline, dedicated drop-in centers, and street outreach teams to ensure that anyone in need of services can easily access them. Broad access allows homeless households to be referred to the hotline or to street outreach (whichever is more appropriate) by day centers, libraries, hospitals, public safety agencies, mental health and social service providers, the religious community, and others.

##### **Homeless Hotline**

The County's 24/7 hotline is staffed by people who are trained in trauma-informed care and well educated in the County's homeless services and coordinated entry system. Staff screen and assess all callers utilizing the Triage Assessment Tool to determine if they are homeless or at risk of imminent homelessness. All clients are assisted in being linked to mainstream resources outside the Homeless Services System including: Social Services, Energy Assistance, Somatic and Behavioral Health, SOAR, Employment Programs, Food Pantries, etc. Basic client information is entered into HMIS, along with the documentation of any services or referrals which were provided.

If a client meets the criteria for being homeless or at imminent risk of homelessness, hotline staff immediately makes efforts to resolve the household's housing crisis through mediation, emergency rental assistance, and/or "rapid re-housing lite". If these diversion efforts are not successful and homelessness for the individual/family cannot be prevented the individual/family will be placed in emergency shelter, provided space is available. Priority for placements in non-congregate emergency shelter initiatives will be prioritized for persons with severe service needs. Regardless of whether space is available the household's information will appear on the CoC's By Name List.

##### **Street Outreach**

People living on the street or other places not meant for human habitation are linked to an outreach team who triages the case and ensures the client's basic needs are being met as completely as possible. They help facilitate obtaining identification, access to behavioral and somatic health providers, food and clothing, and remain in contact with the client until a housing plan can be implemented. Street Outreach team members enter client information in HMIS and in cases where the person is self-reporting more than one year of continuous homelessness or multiple episodes of homelessness, they help gather information to prove chronicity.

##### **Access Points**

All providers of services to homeless households within the CoC have the ability to refer clients onto the Coordinated Entry Prioritization List, either directly as an Access Point, or through the Street Outreach program. Access Points must have staff who are trained and authorized in HMIS and must participate in the Coordinated Entry Prioritization Team. PGCCoC Access points include emergency shelters, drop-in centers, outreach teams, special population workgroups, DV providers, and other organizations which provide services to people experiencing homelessness.

## **Special Populations**

Case managers across the CoC are trained to identify when a client is part of a special population which is a prioritized focus of the CoC and where special resources may be available. When a case manager or counselor at any point in the CoC workflow identifies that a client is a member of a special population, appropriate referrals are made:

- Survivors (Domestic Violence, Human Trafficking, Sexual Assault and others): CCSI, House of Ruth, DASH, CAFY, and Trafficking and Sexual Assault Provider partners
- Unaccompanied Youth and Young Adults (13-24): Sasha Bruce Youthwork, Promise Place, Covenant House, iMind, Mary's Center, University of Maryland College Park, MMYC, and St. Ann's
- Veterans: VA and SSVF providers – Friendship Place, Housing Counseling Services, US Vets, Vesta Inc.
- Returning Citizens: PGCDoc Reentry Division, The Bridge Center at Adams House, Welcome Home, American Justice Reentry & Rehabilitation, Destiny Power & Purpose Inc.
- Chronically Homeless and persons experiencing severe somatic and behavioral health challenges: Street Outreach Team, QCI Behavioral Health, Crisis Response, Safe Journey House, iMind Behavioral Health, Mobile Integrated Healthcare (within Fire/EMS), Health Care Alliance, and the CLASP and ACIS teams
- Elderly and Aging: Adult Protective Services, In Home Aide, TDAP, Assisted living and nursing homes, adult day care, and Metro access.

## **Survivors**

Victims of human trafficking, sexual assault and/or domestic violence (including dating violence, sexual assault, or stalking) will be served by a separate DV coordinated entry process that meets HUD requirements as detailed in the Coordinated Entry Notice and maintains confidentiality requirements outlined in the Violence Against Women Act (VAWA). Survivors access the same housing resources available to the CoC as a whole through the Prioritization Team bi-weekly meeting but do so after their personally identifying information is anonymized. This will ensure that confidentiality and therefore safety can be maintained. Victims of domestic violence may enter the DV coordinated entry process through the county's 24 hour crisis intervention hotline, the 24 hour homeless hotline or through a victim service provider, which is defined in section 401 (32) in the McKinney-Vento Act as a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking.

## **Unaccompanied Homeless Youth and Transitional Age Youth**

Because of the unique needs of Transition Age Youth, the CoC uses a process includes the use of resources that the County has developed specifically to address their needs. Youth enter the coordinated entry process through youth specific street outreach teams and drop in centers, the PGPCS McKinney-Vento Program, the Maryland Crisis Connect Hotline, the Department of Juvenile Services, the Homeless Hotline, and referral from youth service providers.

### **Referrals of TAY to Short Term Shelters and Crisis Programs**

For short term shelters and crisis programs (i.e. 90 day programs), housing placements are not required to be made by matching TAY from the BNL. Providers can make direct referrals to the short term shelters and crisis programs based on the application/intake process of that provider, as long as there is an opening in the crisis program and there is not a TAY prioritized for a crisis program on the BNL. TAY referred to a crisis program from another TAY TH program can return to the referring program without going through Coordinated Entry, if their crisis has resolved. If a TAY is identified as needing crisis services and all of the TAY crisis programs are at capacity, the TAY will be placed on the BNL and identified as needing crisis services, and will be placed as soon as an opening in a TAY crisis program is identified. If multiple TAY are on the BNL and identified as needing crisis services, when an opening in a TAY crisis program is identified, prioritization of the TAY with the highest acuity will be made by the Coordinated Entry Program Manager and the crisis program manager in consultation with the referring agencies.

### **Veterans**

Because of the unique needs of Veterans, the County uses a separate coordinated entry process that meets HUD requirements as detailed in the Coordinated Entry Notice. The process includes the use of the Composite Score Index and full SPDAT and accesses resources that the County has developed specifically to address their needs. Veterans enter the coordinated entry process through special street outreach teams, SSVF and GPD programs, the VA, the homeless hotline, and Serving Together office.

### **Screening and Assessment**

Prince George's County utilizes two assessment tools to guide referrals for emergency rental assistance, rapid re-housing, joint transitional-rapid rehousing, subsidized and unsubsidized housing, and permanent supportive housing based on client need, program eligibility and services offered. The Triage Assessment is our universal initial screening tool, and the Composite Score Index is a more in-depth screening and prioritization schema focused specifically on referrals to supportive housing. Some of the criteria used to determine a client's position on the Priority List include:

- HMIS data, which can help determine chronicity, patterns of homelessness, and prior use of rental assistance.
- The extent to which people, especially youth and children, are unsheltered.
- High utilization of crisis or emergency services, including emergency rooms, jails, and psychiatric facilities, to meet basic needs.
- Significant health or behavioral health challenges or functional impairments which require a significant level of support in order to maintain permanent housing.
- Vulnerability to victimization, including physical assault or engaging in trafficking or sex work.

- Vulnerability to adverse impacts from communicable diseases.

As a method of measuring and sorting these vulnerabilities, the Coordinated Entry Prioritization Team utilizes a Composite Score Index to efficiently identify which clients have the most barriers to returning to housing so they can be prioritized for a housing intervention.

### **Triage Assessment Tool**

The Triage Assessment is an intake and assessment tool which captures data elements required for all clients being served by the CoC, regardless of their point of access into the system. It assesses a client's eligibility for referral to special programs (Veteran, Unaccompanied Homeless Youth, Transition Age Youth, DV, Chronic, etc.) and homelessness prevention and diversion interventions. It incorporates the HUD required Crisis Needs Assessment and the Current Living Situation and Coordinated Entry Event sub-assessments.

### **Composite Score Index**

A Composite Score allows the particular vulnerabilities of homeless households in consideration for limited housing supports to be weighed against each other in the prioritization process conducted by the Coordinated Entry Prioritization Team. The Composite Score is produced from data elements in HMIS and information provided by case managers at CoC Access Points. The elements of the Composite Score are weighed as follows:

Priority	Approximate % of Composite Score	Factors
Length of Time Homeless	11%	Length of time homeless based on HMIS
Living Situation	19%	Place not meant for human habitation
		Non-congregate shelter
		Emergency shelter
		Other/Institutionalization
		Rapid Rehousing
Sub-Population	28%	Families with children under 4 years old
		Families with children over 4 years old
		Older adults
		Unaccompanied Homeless Youth (UHY)
		Systems Connected Youth
		Veterans
		Returning Citizens

		Actively Fleeing DV/Human Trafficking
Most Needs	43%	Returns to Homelessness
		Multiple evictions
		Medical Needs
		Large family
		Mental health
		Developmental health
		Substance use
		Physical Disability
		Chronic Health Condition
		HIV/AIDS

Participants in the coordinated entry process are free to decide what information they provide during the assessment process. They will not be denied assessment or services if they refuse to provide certain pieces of information, unless the information is necessary to establish or document program eligibility per the applicable program regulations.

#### **Coordinated Entry Prioritization Team Meetings/Referral Protocols**

CoC leadership will keep Coordinated Entry staff up to date on the housing resources available within the Coordinated Entry system, including Supportive Housing, Supportive Services Only, and dedicated Housing Voucher programs. Coordinated Entry staff will coordinate with supportive housing program staff to identify openings in real time and provide referrals from the prioritization list as soon as an opening is identified.

The Prioritization Team determines whether potential participants meet project-specific requirements of the projects for which they are prioritized and to which they are referred. The process of collecting required information and documentation regarding eligibility occurs concurrently with the assessment, scoring, and prioritization processes. Eligibility information is not used as part of prioritization and ranking.

The Prioritization Team meets bi-weekly to review the prioritized list of homeless clients. The team is composed of representatives from ES, SSO, RRH, TH-RRH, and PSH providers, the VA, behavioral health providers, the SOAR team and Street Outreach. Prior to the bi-weekly meeting, notice is sent out that includes the minutes from the last meeting, placements made from the prioritization lists, and the current prioritized lists of homeless households.

During the bi-weekly meeting the Prioritization Team discusses individual clients and which program could best serve them. Resources from outside the CoC are discussed and linkages to them. The prioritization list for each type of housing is reviewed and the order of priority is confirmed by the Prioritization Team, with adjustments being made as necessary. Once the team confirms the prioritization lists, the households on the prioritization lists are essentially “pre-referred” for any eligible opening which is identified until the next Prioritization Team meeting.

At the time of referral to supportive housing, the referring Access Point will need to provide a verification of homelessness and some proof of legal residency in the United States to the supportive housing provider. Permanent Supportive Housing projects will also need the Access Point to provide the signed Verification of Chronic Homelessness form. If possible, the referring Access Point should also provide the following client documents to the supportive housing program:

- Birth Certificate for all household members
- Social Security cards for all adults
- Government-issued photo ID
- Proof of income
- Verification of homelessness
- DD-214 (for Veteran referrals)

### **Referral Rejection Policy**

No client may be turned away from homeless dedicated housing due to lack of income, lack of employment, disability status, or substance use unless the project's primary funder requires the exclusion or a previously existing and documented neighborhood covenant/good neighbor agreement has explicitly limited enrollment to clients with a specific set of attributes or characteristics. Housing Providers restricting access to projects based on specific client attributes or characteristics will need to provide documentation to the CoC providing a justification for their enrollment policy.

Both CoC housing providers and program participants may deny or reject referrals. Referral rejections from housing providers should be infrequent and must be documented in HMIS with specific justification as prescribed by the CoC. Allowable criteria for denying a referral include:

- Client/household refused further participation (or client moved out of CoC area)
- Client/household does not meet required criteria for program eligibility
- Client/household unresponsive to multiple communication attempts
- Client resolved crisis without assistance
- Client/household safety concerns
- Property management denial (include specific reasons documented by property manager and validated under fair housing laws).

### **Grievance and Appeal Procedure**

If a client or provider is dissatisfied with the decision of the Coordinated Entry Team, they must put their concern in writing and request a meeting with the CoC leadership. CoC leadership will review the written document to schedule a meeting with the client within 5 business days of receiving the request and will render a decision in writing within 5 business days of the meeting.

## **4. Housing Interventions and Prioritization**

### **Housing First**

Housing First is an approach to permanent housing which HUD strongly recommends, and which has been shown to improve the housing outcomes of homeless households and will reduce overall

homelessness within a CoC's geographic area. As defined by HUD, the core elements of a Housing First approach are:

- Few to no programmatic prerequisites to permanent housing entry
- Low barrier admission policies
- Rapid and streamlined entry into housing
- Supportive services are voluntary, but can and should be used to persistently engage tenants to ensure housing stability
- Tenants have full rights, responsibilities, and legal protections
- Practices and policies to prevent lease violations and evictions
- Applicable in a variety of housing models

### **Move On Strategy**

The purpose of Coordinated Entry is to connect homeless households with the least restrictive, least intensive intervention which will help them permanently resolve their housing crisis. Some households will need the most intensive ongoing supports in order to maintain their housing, but some households, even those who begin in the most intensive programs, will eventually stabilize and be able to maintain permanent housing without CoC supports and resources. All programs should work with their clients to assess whether the household could be moved to a less intensive program type, or even move on from CoC support and resources entirely. Coordinated Entry staff will work with program staff to routinely screen all CoC programs to identify participants living in a CoC PSH program and certified by the CoC as appropriate for transition from a high acuity level of support into other less intensive housing opportunities to create opportunities for placement of new high acuity admissions from the CoC Prioritization List.

### **Housing Vouchers, Public Housing and HOME ARP**

Set-aside housing units made available to the CoC by the Prince George's County Department of Housing and Community Development and local Housing Authorities should be utilized judiciously to resolve housing crises for households who are ready to move on from the need for high acuity projects, or for literally homeless households who have unusual barriers which CoC supportive housing projects cannot overcome (for example a household with more members than can be served in CoC transitional housing programs). Housing Vouchers should be prioritized for households who:

- Have an extensive history of homelessness,
- Are expected to lack of sufficient financial resources to ever afford market rate housing,
- Have sufficient resources that the application of a Housing Voucher would permanently resolve their housing crisis,
- Can handle all activities of daily living including rent payment, utility payments, etc.
- Have the ability to communicate respectfully and responsibly with Rental Offices and Utility companies, so as not to put their voucher at risk,
- If possible, for households who are literally homeless but lack financial prospects without the voucher to make them good candidates for RRH, they may be enrolled in RRH with financial subsidy and case management as a bridge to self-sufficiency with the voucher in place.
- Are otherwise described and/or prioritized in Agreements associated with special set aside housing unit types.

## **Prioritization Standards**

The CoC's order of priority ensures that those persons with the longest histories residing in places not meant for human habitation, in emergency shelters, and in safe havens and with the most severe service needs are given first priority in PSH that is dedicated or prioritized for chronic homelessness.

In PSH that is not dedicated or prioritized for chronic homelessness those persons who do not yet meet the definition of chronic homelessness but have the longest histories of homelessness and the most severe service needs and are therefore the most at risk of becoming chronically homeless, are prioritized.

The matching and referral linkage process utilizes these prioritization criteria for each project type and takes into account the severity of the needs, length of time homeless, subpopulation characteristics, use of emergency public safety services and other criteria depending on the specific project type.

## **HOME-ARP Units**

To address the need for homelessness assistance and supportive services, Congress appropriated ARP funds to be administered through HOME 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.

### **Qualifying populations**

ARP defines qualifying individuals or families as those that are (1) homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) ("McKinney-Vento"); (2) at risk of homelessness, as defined in section 401 of McKinney-Vento; (3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; (4) part of other populations where providing supportive services or assistance would prevent a family's homelessness or would serve those with the greatest risk of housing instability; or (5) veterans and families that include a veteran family member that meet the criteria in one of (1)-(4) above.

### **Prioritization**

The Prince George's County Continuum of Care is the referral agency for all HOME-ARP funded rental units. The qualifying population definitions are outlined in HUD Notice CPD-21-10. While the units are open to all qualifying populations, the Coordinated of Care will utilize the following method of prioritization:

Order of Priority 1: A household should be prioritized first for HOME-ARP funded units if the following are true:

- The household is eligible for HOME-ARP funded housing under the Homeless Qualifying Population as defined by 24 CFR 91.5 Homeless (1); and



- The household has been identified as having severe service needs.

Order of Priority 2: A household should be prioritized second for HOME-ARP funded units if the following are true:

- The household is eligible for HOME-ARP funded housing under the Homeless Qualifying Population as defined by 24 CFR 91.5 Homeless (1); and
- The household has NOT been identified as having severe service needs; and
- The household has been living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 6 months OR has experienced three occasions in the past 3 years of living in one of these locations; and,
- There are no eligible households within the CoC's geographic area that meet the criteria under Order of Priority 1 for HOME-ARP funded units

Order of Priority 3: A household should be prioritized third for HOME-ARP funded units if the following are true:

- The household is eligible for HOME-ARP funded housing under the Homeless Qualifying Population as defined by 24 CFR 91.5 Homeless (1); and
- The household has NOT been identified as having severe service needs; and
- The household has been living in a place not meant for human habitation, a safe haven, or in an emergency shelter for less than 6 months OR has experienced less than three occasions in the past 3 years of living in one of these locations; and
- There are no eligible households within the CoC's geographic area that meet the criteria under Order of Priority 1 or 2 for HOME-ARP funded units

Order of Priority 4: A household should be prioritized fourth for HOME-ARP funded units if the following are true:

- The household is eligible for HOME-ARP funded housing under the Homeless Qualifying Population as defined by 24 CFR 91.5 Homeless (2), or (3); and
- There are no eligible households within the CoC's geographic area that meet the criteria under Order of Priority 1, 2, or 3 for HOME-ARP funded units

### **Rapid Rehousing**

Rapid Re-housing (RRH) provides Prince George's County residents who are homeless with short-term housing subsidies allowing them to quickly achieve stable housing and become sustainably re-housed. RRH financial subsidy will generally be provided on a declining basis and all participants will be reassessed monthly to determine individual subsidy levels based on need and progress towards goals. Assistance will cease as soon as the participant is determined to be stable but may be provided for a period of no more than twelve (12) months. See the Prince George's County Continuum of Care: Rapid Re-Housing Policies and Procedures, incorporated herein by reference.

An applicant shall be eligible to receive RRH assistance if they:

1. Are a resident of Prince George's County, and,

2. Are currently literally homeless as defined by HUD (which includes having a primary nighttime residence that is a publicly or privately operated shelter or transitional housing facility designed to provide temporary living accommodations; or a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings), and,
3. Are referred by the Coordinated Entry Prioritization Team, and,
4. Have no other housing option (must be validated by the CoC).

Given that there will be more eligible applicants for RRH funds than limited resources can support, additional criteria will be considered by the HSP's Coordinated Entry Steering Committee and priority will be given to candidates who demonstrate the current capacity (or well-planned, potential capacity) to quickly achieve stable housing, **AND** who meet at least one of the following conditions:

- Homelessness status was a result of a *one-time* crisis – financial, health, domestic violence – for whom it can reasonably be assumed will become self-sustaining once the crisis is resolved.
- Reasonable expectation for career advancement or increased income as indicated by tenure in current employment, expected completion of education/vocational programs, achievement of skills and training certifications, or pending military, retirement or social security benefits.
- Documented opportunity of receiving subsidized housing or an assisted living placement within approximately twelve (12) months.
- Referred and case managed by one of the County's problem-solving courts (re-entry, drug, veterans, family and youth).
- Defined as Unaccompanied Homeless Youth, elderly, Domestic Violence survivor, or having a diagnosed disability (including HIV).

### **Joint Transitional-Rapid Rehousing**

An applicant shall be eligible to receive Transitional-Rapid Rehousing if they:

1. Are a resident of Prince George's County, and,
2. Are currently literally homeless as defined by HUD (which includes having a primary nighttime residence that is a publicly or privately operated shelter or transitional housing facility designed to provide temporary living accommodations; or a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings) , and,
3. Are referred by the HSP's Coordinated Entry Prioritization Team, and,
4. Have no other housing option (must be validated by the CoC).

Given that there will be more eligible applicants for TH-RRH than limited resources can support, additional criteria will be considered by the HSP's Coordinated Entry Steering Committee and priority will be given to candidates who demonstrate planned, potential capacity to achieve stable housing, **AND** who meet at least one of the following conditions:

- Defined as Unaccompanied Homeless Youth or Domestic Violence survivor.
- Reasonable expectation for career advancement or increased income as indicated by tenure in current employment, expected completion of education/vocational programs, achievement of skills and training certifications, or pending military, retirement or social security benefits.
- Referred and case managed by one of the County's problem-solving courts (re-entry, drug, veterans, family and youth).

## **Permanent Supportive Housing**

All admissions into PSH must come through Coordinated Entry and be accompanied by the CoC's *Verification of Chronic Homelessness Documentation Checklist and Summary* (addendum a). Because many of the CoC's PSH units are shared 2- or 3-bedroom apartments, Access Point case managers should work to identify other chronically homeless individuals with whom a person may be compatible. Prince George's County CoC has adopted the provisions and requirements set out in the HUD Notice CPD-14-012 for the Prioritizing Person's Experiencing Chronic Homeless and Other Vulnerable Homeless Persons in Permanent Supportive as the baseline written standards for operations of Permanent Supportive Housing Programs within the CoC.

### **PSH Dedicated or Prioritized for PSH**

Order of Priority 1: A household should be prioritized first in dedicated or prioritized PSH if all of the following are true:

- Individual or head of household meets the definition of chronically homeless per 24 CFR 578.3; and,
- The length of time the individual or head of household has been homeless is at least 12 months continuously or over a of at least four occasions in the past 3 years where the total length of time homeless totals at least 12 months; and,
- The individual or head of household has been identified as having severe service needs (as outlined in Section 2 of this Policy).

Order of Priority 2: A household should be prioritized second in dedicated or prioritized PSH if all of the following are true:

- Individual or head of household meets the definition of chronically homeless per 24 CFR 578.3; and,
- The length of time the individual or head of household has been living in a place not meant for human habitation, a safe haven, or in an emergency shelter is at least 12 months continuously or over a period of at least four occasions in the past 3 years where the total length of time homeless totals at least 12 months; and,
- The individual or head of household has NOT been identified as having severe service needs; and,
- There are no chronically homeless households within the CoC's geographic area that meet the criteria under Order of Priority 1 for dedicated or prioritized PSH.

Order of Priority 3: A household should be prioritized third in dedicated or prioritized PSH if all of the following are true:

- Individual or head of household meets the definition of chronically homeless per 24 CFR 578.3; and,
- The length of time the individual or head of household has been living in a place not meant for human habitation, a safe haven, or in an emergency shelter is at least four occasions in the past 3 years where the total length of time homeless totals less than 12 months; and,
- The individual or head of household has been identified as having severe service needs; and

- There are no chronically homeless households within the CoC's geographic area that meet the criteria under Order of Priority 1 and 2 for dedicated or prioritized PSH.

Order of Priority 4: A household should be prioritized fourth in dedicated or prioritized PSH if all of the following are true:

- Individual or head of household meets the definition of chronically homeless per 24 CFR 578.3;
- The length of time the individual or head of household has been living in a place not meant for human habitation, a safe haven, or in an emergency shelter is at least four occasions in the past 3 years where the total length of time homeless totals less than 12 months; and,
- The individual or head of household has NOT been identified as having severe service needs; and
- There are no chronically homeless households within the CoC's geographic area that meet the criteria under Order of Priority 1, 2, and 3 for dedicated or prioritized PSH.

**PSH that is not dedicated or prioritized for Chronically Homeless:**

Order of Priority 1: A household should be prioritized first in non-dedicated and non-prioritized PSH if the following are true:

- The household is eligible for CoC Program-funded PSH meaning that there is a household member with a disability, and they are coming from a place not meant for human habitation, a safe haven, or in an emergency shelter. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution; and
- The household has been identified as having severe service needs.

Order of Priority 2: A household should be prioritized second in non-dedicated and non-prioritized PSH if all of the following are true:

- The household is eligible for CoC Program-funded PSH meaning that there is a household member with a disability, and they are coming from a place not meant for human habitation, safe haven, or emergency shelter. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution; and,
- The household has been living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 6 months or has experienced three occasions in the past 3 years of living in one of these locations; and,
- The household has NOT been identified as having severe service needs; and,
- There are no eligible households within the CoC's geographic area that meet the criteria under Order of Priority 1 for non-dedicated or non-prioritized PSH.

Order of Priority 3: A household should be prioritized third in non-dedicated and non-prioritized PSH if all of the following are true:

- The household is eligible for CoC Program-funded PSH meaning that there is a household member with a disability, and they are coming from a place not meant for human habitation, safe haven, or emergency shelter. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution; and,
- The household has NOT been identified as having severe service needs AND has been living in a place not meant for human habitation, a safe haven, or in an emergency shelter for less than six months or has experienced less than three occasions of living in one of these locations in the past 3 years; and,
- There are no eligible households within the CoC's geographic area that meet the criteria under Order of Priority 1 and 2 for non-dedicated or non-prioritized PSH.

Order of Priority 4: A household should be prioritized fourth in non-dedicated and non-prioritized PSH if the following is true:

- Any household that is eligible for CoC Program-funded PSH meaning that there is a household member with a disability, and they are coming from transitional housing where they entered directly from a place not meant for human habitation, emergency shelter, or safe haven.
- There are no eligible households within the CoC's geographic area that meet the criteria under Order of Priority 1, 2, and 3 for non-dedicated or non-prioritized PSH.

## Addendum A: Verification of Chronic Homelessness Documentation Checklist and Summary

### Verification of Chronic Homelessness Documentation Checklist and Summary

An applicant must be chronically homeless to be considered for PSH. To be considered chronically homeless, the Head of Household (HoH) must meet at least one of the specific elements of each of the following criteria:

#### 1. Housing Status

- a. Currently homeless and has been continuously homeless for one year or longer
- b. Currently homeless and has experienced four or more occasions of homelessness, totaling 12 months or more, in the past three years
- c. Has been residing in an institutional care facility for fewer than 90 days and his/her housing status was either a. or b. before entering that facility

#### 2. Disability

- a. Developmental Disability
- b. HIV or AIDS
- c. Physical, mental, or emotional impairment that meets all of the following criteria:
  - i. Is expected to be of long-continuing or indefinite duration, and
  - ii. Impedes the individual's ability to live independently, and
  - iii. Is such that the ability to live independently could be improved with more suitable housing

To confirm program eligibility, please complete this form in its entirety.

Head of Household Name: \_\_\_\_\_ Date: \_\_\_\_\_

Referring Staff & Organization: \_\_\_\_\_ VI-SPDAT Score: \_\_\_\_\_

**Disability** – as defined by section 401(9) of the McKinney-Vento Homeless Assistance Act (43 U.S.C. 11360(9)).

**Third Party Documentation is required.** Please indicate the type of verification supplied and attach to this form.

- ☐ Written verification from a **licensed professional** certifying that the disability is expected to be long-continuing or of indefinite duration and substantially impedes the individual's ability to live independently
- ☐ Written verification from the **Social Security Administration**
- ☐ Receipt of a **disability check**
- ☐ Temporary Option – *Staff Observations of a disability can be used for program entry, but must be confirmed by one of the above written standards within 90 days of program entry.*

**Current Living Situation** – To be considered chronically homeless, the individual must meet one of the following homeless conditions the night before entering the program.

**Documentation and Details must be provided by completing the *Chronic Homeless Summary* (attached).**

- ☐ Lives in a place not meant for human habitation or an emergency shelter.
- ☐ Has been residing in an institutional care facility for fewer than 90 days and met the homelessness criteria above before entering the facility (including but not limited to jail, substance abuse or mental health treatment facility or hospital).

**Homeless History** – To be considered chronically homeless, the individual must meet one of the following two homeless history conditions. (Documentation and Details must be provided by completing the *Chronic Homeless Summary* (attached)).

**The individual must have been living in a place not meant for human habitation, or an emergency shelter:**

- ☐ **Continuously for at least 12 months**, without a break of 7 or more consecutive nights
- ☐ **On at least 4 separate occasions in the last 3 years**, where the combined occasions equal at least 12 months

Notes: Stays in institutional care facilities for fewer than 90 days do not constitute a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was residing in an emergency shelter or place not meant for human habitation immediately before entering the institutional care facility.

A single encounter in a month is sufficient to consider the household homeless for the entire month unless evidence of a break.

**Criteria for Documentation of Homeless History:** You do not need to complete this page. It is for reference only.

*Notes to Providers:*

- At least 9 of the 12 months of homelessness or 3 of the 4 incidents of homelessness must be certified by third-party documentation. Three months or one incident can be self-certified.
- A single encounter in a month is sufficient to consider the household homeless for the entire month unless evidence of a break.
- In extreme cases self-certification of homelessness for more than 3 of 12 months or 1 of 4 incidents of homelessness is allowable if third-party documentation cannot be obtained.
  - Attempts to obtain 3rd party documentation must be thoroughly documented along with the reasons why 3rd party documentation was not obtained; and
  - This is limited to rare circumstances. No more than 25% of households served in a program during an operating year can be self-certified.

Current Living Situation	Suitable Documentation
<b>Streets or other place not meant for human habitation</b>	<ul style="list-style-type: none"> <li>• <b>Written Third Party</b> (one or more of the following)               <ul style="list-style-type: none"> <li>○ HMIS record of calls to Hotline and/or street outreach contacts</li> <li>○ Signed letter on letterhead from street outreach or homeless service provider</li> <li>○ Signed letter on letterhead from referral sources including: feeding centers, churches, somatic and behavioral health providers, crisis response, police, and libraries.</li> </ul> </li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• <b>Self-Declaration</b> (both of the following):               <ul style="list-style-type: none"> <li>○ Signed declaration of homelessness</li> <li>○ Written explanation by staff of attempts to secure 3<sup>rd</sup> party verification</li> </ul> </li> </ul>
<b>Emergency Shelter</b> (includes hypothermic, church-based, domestic violence and County shelters)	<ul style="list-style-type: none"> <li>• <b>Written Third Party</b> (one or more of the following)               <ul style="list-style-type: none"> <li>○ HMIS record of shelter stay</li> <li>○ Signed letter on letterhead from the shelter provider</li> </ul> </li> </ul> <p>OR</p> <ul style="list-style-type: none"> <li>• <b>Self-Declaration</b> (both of the following):               <ul style="list-style-type: none"> <li>○ Signed declaration of homelessness</li> <li>○ Written explanation by staff of attempts to secure 3<sup>rd</sup> party verification</li> </ul> </li> </ul>
<b>Hospital, Jail, or Other Institution</b> If the client's stay was 90 days or less and the client was in shelter or on the streets prior to entry, the time at the institution is counted as time homeless. If the client's institutional stay is over 90 days it is counted as a break in homelessness.	<ul style="list-style-type: none"> <li>• <b>Written Third Party</b> (one or more of the following)               <ul style="list-style-type: none"> <li>○ Letter or discharge paperwork from hospital or other institution, including admission and discharge dates</li> <li>○ Referral from Dept of Corrections, Offender Reentry Program or one of the County's Specialty Courts</li> <li>○ Record of institutional stay pulled from institutional database</li> </ul> </li> </ul> <p>AND, to document homelessness, at least one of the types of documentation required for streets or shelter homelessness related to the client's housing status immediately prior to stay in the institution, or identification as homeless upon intake at the institution.</p>

**Chronic Homelessness Summary: Please complete this form in its entirety.**

In the table below, chart the HoH's housing situation for one year or three years, depending on the category by which s/he is being qualified. Attach sufficient documentation for each change in housing situation. Up to 3 months (or one episode) can be documented through self certification.

The HoH is eligible because s/he has experience (check one)

- ☐ Continuous homelessness on the streets or in shelters for 1 year or longer (document at least the past 1 year)
- ☐ 4 or more occasions of homelessness totaling 12+ months on the streets or in the shelters in the past 3 years (document the past 3 years)

	Start Date	End Date	Duration	Location (Type)	Location (Provider name or location description)	Documentation	Attached
Episode 1				<input type="checkbox"/> Place not meant for habitation <input type="checkbox"/> Emergency Shelter <input type="checkbox"/> Institution < 90 days		<input type="checkbox"/> HMIS or Institutional record <input type="checkbox"/> Housing/ Service Provider <input type="checkbox"/> Outreach/ Referral Provider <input type="checkbox"/> Client Self-Certification	<input type="checkbox"/> Yes <input type="checkbox"/> No
Episode 2				<input type="checkbox"/> Place not meant for habitation <input type="checkbox"/> Emergency Shelter <input type="checkbox"/> Institution < 90 days		<input type="checkbox"/> HMIS Institutional record <input type="checkbox"/> Housing/ Service Provider <input type="checkbox"/> Outreach/ Referral Provider <input type="checkbox"/> Client Self-Certification	<input type="checkbox"/> Yes <input type="checkbox"/> No
Episode 3				<input type="checkbox"/> Place not meant for habitation <input type="checkbox"/> Emergency Shelter <input type="checkbox"/> Institution < 90 days		<input type="checkbox"/> HMIS Institutional record <input type="checkbox"/> Housing/ Service Provider <input type="checkbox"/> Outreach/ Referral Provider <input type="checkbox"/> Client Self-Certification	<input type="checkbox"/> Yes <input type="checkbox"/> No
Episode 4				<input type="checkbox"/> Place not meant for habitation <input type="checkbox"/> Emergency Shelter <input type="checkbox"/> Institution < 90 days		<input type="checkbox"/> HMIS Institutional record <input type="checkbox"/> Housing/ Service Provider <input type="checkbox"/> Outreach/ Referral Provider <input type="checkbox"/> Client Self-Certification	<input type="checkbox"/> Yes <input type="checkbox"/> No

**Certifications**

I, the Head of Household named below, certify that the timeline documented above is accurate to the best of my recollection.

Head of Household Name (printed): \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

I, the Staff named below, certify that the timeline documented above is accurate as the HoH described it during the interview(s) conducted on the following date(s): \_\_\_\_\_

Staff Name (printed): \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_



[illegible]

Coordinated Entry System Workflow - Version 4.1												
Who: Homeless Helpline	Who: Homeless Prevention Providers	Who: Housing Stabilization Program (HSP)	Who: DV Service Providers	Who: DV Service Providers (cont)	Who: Outreach/Non-shelter Service Provider	Who: Emergency Shelters	Who: Coordinated Entry Staff & Case Conferencing Team	Who: Access Point (Referral Source)	Who: Transitional Housing Provider	Who: Rapid Rehousing Provider	Who: Permanent Supportive Housing Provider	Who: Public Housing Authority/Voucher Provider in HMS
<p><b>1</b> The Prince George's County Homeless Helpline (1-888-721-0899) is the central information and access point for homelessness services, including emergency shelter. The Helpline screens for Domestic Violence, Human Trafficking, Sexual Assault, Veteran status, and Transition Housing. Helpline staff refer clients to appropriate services.</p> <p><b>2</b> The Prince George's County Helpline is a 24-hour, toll-free, confidential helpline which captures the data elements required for all clients in HMS. It assesses a client's eligibility for referral to special programs and services, and it coordinates the Current Living Situation Assessment (CEA), and Coordinated Entry Event, and provides referrals for Coordinated Entry.</p> <p><b>3</b> A Coordinated Entry Event (CEE) documents a referral or a client who needs Crisis or Housing services.</p> <p><b>4</b> A Coordinated Entry Assessment (CEA) documents the identification of a client who needs Crisis or Housing services.</p> <p><b>5</b> Homeless Prevention Assistance is for households who are at risk of homelessness within 14 days due to an imminent event.</p> <p><b>6</b> Eligibility for programs in Prince George's County may depend on program requirements. See <a href="https://bit.ly/2EP7ZnZ">https://bit.ly/2EP7ZnZ</a> for more information on the categories of homelessness defined by the McKinney-Vento Act, or consult the Coordinated Entry Policy.</p> <p><b>7</b> Outreach is a strategy that provides information for people seeking shelter by helping them identify immediate alternate housing arrangements and, if necessary, providing them with services and financial assistance to help them remain in or return to permanent housing.</p>		<p><b>8</b> Post placement follow up case management services are CoC funded and available to households leaving a CoC program. The goal is to provide support and stability in the POC CoC. This is called the Housing Stabilization Program (HSP).</p> <p><b>9</b> DV Service Providers who can perform intake into the DV Service System of the CoC which serve Prince George's County DV Coalition:</p> <ul style="list-style-type: none"><li>Information on clients experiencing domestic violence (human trafficking or violence) (collectively referred to as DV) cannot have Personally Identifying Information (PII) entered into HMS, per the requirements of the Privacy Act of 1974 (PADA). Client information including PII is maintained in a Comparable Database. Information necessary for the clients' safety and well-being is entered into HMS with the PII anonymized. See Prince George's County Domestic Violence Policy for more details.</li><li>Rapid Resolution is an intervention designed to prevent immediate entry into homelessness or immediately resolve a household's homelessness once they are housed. This includes housing or an unsheltered situation.</li></ul> <p><b>10</b> The Coordinated Entry Summary is created when an Access Point case manager completes an intake and enters information into a Google Form created by CE staff. The CE Summary collects all information related to the intake and provides a narrative that is not already contained in HMS.</p>		<p><b>11</b> Outreach and non-shelter service providers are projects or programs within or outside of the CoC which serve unsheltered homeless individuals and have the ability to perform assessments and make referrals in HMS. This includes DSS Street Outreach at Adams House, homeless drop-in centers, the Healthcare Alliance, POC Department of Corrections, and others.</p>	<p><b>12</b> Emergency Shelters provide shelter for people experiencing homelessness and include case management services. They are not sheltered in HMS.</p>	<p><b>13</b> The CE Case Prioritization Team (CE Team) is made up of representatives of the defined Access Points, CoC Partners, and is chaired by Program Manager (CEPM). The CE Team meets bi-weekly to review and approve the Prioritization Lists.</p> <p><b>14</b> The Composite Score Index produces a vulnerability score from questions and data elements in HMS.</p> <p><b>15</b> The By Name List is made up of all homeless individuals in the CoC who are unsheltered, meet the HUD definition of Chronically Homeless, and/or are referred to Coordinated Entry because they are expected to resolve through routine case management.</p> <p>Chronically homeless has been defined by HUD as a single individual or a household with a disabling condition who has either experienced homelessness for longer than a year (living in substandard housing or a shelter, safe haven, or a household with a disability) or experienced at least 12 months of homelessness in four or more instances in the last three years.</p> <p><b>16</b> The Prioritization Lists are made up of the highest vulnerability clients on the By Name List and are case management referrals to supportive housing resources by the Coordinated Entry Team.</p> <p><b>17</b> The "Yellow Book" is the Coordinated Entry Weekly Meeting to prioritize clients. It is made up of the Prioritization List of clients and a summary sheet for each client on the By Name List. The CE Summary Google Form, it's called the "Yellow Book" because the original resources were placed in yellow report covers.</p>	<p><b>18</b> Access Points are service providers who encounter unsheltered homeless individuals or households and can make referrals to the Coordinated Entry Program. They are the primary point of case management for clients who have not yet been placed in supportive housing. At this time, only Prince George's County CoC Access Points are:</p> <ul style="list-style-type: none"><li>AQS</li><li>Chronic Homelessness Workgroup</li><li>Covenant House</li><li>Department of Corrections</li><li>DSS Street Outreach</li><li>Domestic Violence Workgroup</li><li>Family Emergency Shelter</li><li>Housing Initiative</li><li>Homelessness Workgroup</li><li>MARS</li><li>Mission of Love</li><li>Charles Day Center</li><li>PO Plaza Day Center</li><li>Prince Georges</li><li>Promises Place</li><li>QCI</li><li>Safe Placings</li><li>Sasha Blue</li><li>Shelter for Women</li><li>Senior Homelessness Workgroup</li><li>Shepherds Cove</li><li>SOAR</li><li>Veteran Homelessness Workgroup</li><li>VOAOC</li><li>Warm Nights</li><li>Youth Homelessness Workgroup</li></ul>	<p><b>19</b> Transitional Housing provides housing for up to 24 months in a facility owned or leased by a TH provider. In Prince George's County, TH projects are generally joint THRH projects which provide short-term housing while a household locates permanent housing. Case management for some time after move in. TH providers can make referrals to Coordinated Entry like emergency shelters.</p>	<p><b>20</b> Rapid Rehousing Providers enroll clients referred by Coordinated Entry and then help the household locate their own rental unit, receive financial assistance, and obtain mental health services along with 12 months of case management. Households in RRH do not accrue time for the purposes of chronicity, but are considered homeless or at risk of homelessness if they are referred to RRH as a "bodge" to PSH, or who need a "step" up to a permanent subsidy like a housing voucher. Can be referred to Coordinated Entry.</p>	<p><b>21</b> Permanent Supportive Housing Providers offer the most intensive level of case management in housing programs in the POC CoC. All programs in the POC CoC are managed by Prince George's County. County is dedicated with some variations for persons who meet the HUD definition of Chronic Homelessness. Permanent supportive housing is long as the need that level of assistance. Households who have sufficiently stabilized and are able to "move on" to PSH, or who need to be referred to Coordinated Entry for a housing voucher, can be referred to Coordinated Entry.</p>		

## 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: Prince George's County, Maryland

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

52-6000998

\* c. UEI:

058592189000

### d. Address:

\* Street1: 9200 Basil Court, Suite 500

Street2:

\* City: Largo

County/Parish:

\* State: MD: Maryland

Province:

\* Country: USA: UNITED STATES

\* Zip / Postal Code: 20774-3043

### e. Organizational Unit:

Department Name:

Housing and Community Dev.

Division Name:

Housing and Community Dev.

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

Prefix: Ms.

\* First Name: Aspasia

Middle Name:

\* Last Name: Xypolia

Suffix:

Title: Director

Organizational Affiliation:

County Government

\* Telephone Number: 301-883-5531

Fax Number: 301-883-9832

\* Email: AXypolia@co.pg.md.us

## Application for Federal Assistance SF-424

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

B: County Government

### Type of Applicant 2: Select Applicant Type:

### Type of Applicant 3: Select Applicant Type:

### \* Other (specify):

### \* 10. Name of Federal Agency:

U.S. Department of Housing and Urban Development

### 11. Catalog of Federal Domestic Assistance Number:

14-239

### CFDA Title:

HOME Program

### \* 12. Funding Opportunity Number:

### \* Title:

### 13. Competition Identification Number:

### Title:

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

County

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Prince George's County Substantial Amendment to the Federal FY 2021 (County FY 2022) Annual Action Plan to include the HOME American Rescue Plan (ARP) application.

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 MD-004

\* b. Program/Project MD-004

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

MD-005

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date: 09/20/2021

\* b. End Date: 09/30/2030

**18. Estimated Funding (\$):**

* a. Federal	7,592,085.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	7,592,085.00

**\* 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: Aspasia

Middle Name:

\* Last Name: Xypolia

Suffix:

\* Title: Director

\* Telephone Number: 301-883-5531

Fax Number: 301-883-9832

\* Email: AXypolia@co.pg.md.us

\* Signature of Authorized Representative:



\* Date Signed: 11/15/2022

## 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.

<b>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</b> 	<b>TITLE</b> Director
<b>APPLICANT ORGANIZATION</b> Prince George's County Dept. of Housing and Community Dev.	<b>DATE SUBMITTED</b> 11/15/2022



## 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.

<b>SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL</b> 	<b>TITLE</b> Director
<b>APPLICANT ORGANIZATION</b> Prince George's County Dept. of Housing and Community Dev.	<b>DATE SUBMITTED</b> 11/15/2022

## **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

11/15/2022  
\_\_\_\_\_  
Date

Director  
\_\_\_\_\_  
Title