



HOME-American Rescue Plan Program

CITY OF RACINE, WISCONSIN

INCORPORATED IN 1848

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Introduction

The overall purpose of HUD HOME-ARP funding is to assist the following four qualifying populations:

1. Homeless
2. At risk of homelessness
3. Fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.
4. Other populations where assistance would prevent homelessness or serve those with the greatest risk of housing instability, including:
 - Households previously qualified as homeless
 - Households currently housed due to temporary or emergency assistance.
 - Households needing additional housing assistance or supportive services to avoid a return to homelessness.

HUD Requirements:

The plan includes elements required by HUD:

- 1. Consultation and Public Participation:**
 - An outline of the consultation and public participation processes used to inform the plan.
 - Details about the feedback received through these processes.
- 2. Assessment of Needs:**
 - An assessment of the needs of the qualifying populations.
 - Identification of gaps in local housing and service systems.
- 3. Planned Use of Funds:**
 - Explanation of how HOME-ARP funds will be utilized to support priority activities and production goals.
- 4. Limitations:**
 - Any limitations or restrictions associated with the use of the funds.

This plan demonstrates a comprehensive approach to addressing homelessness and housing instability within the City of Racine, aligning with the requirements set forth by HUD. It emphasizes targeted support for specific populations and includes a thoughtful assessment of local needs and gaps in housing and service systems. The transparent communication of the consultation and public participation processes ensures community involvement in the decision-making process.

City Demographics

1. Population:

- The population of Racine in 2023 is 76,233.
- The city has been experiencing a decline at a rate of -0.58% annually.
- Since the most recent census in 2020, the population has decreased by -1.73%.

2. Economic Indicators:

- Average household income in Racine is \$61,062.
- The poverty rate in Racine is 19.81%.

3. Housing Statistics:

- The median rental cost is \$1,113 per month.
- The median house value in Racine is \$188,000.

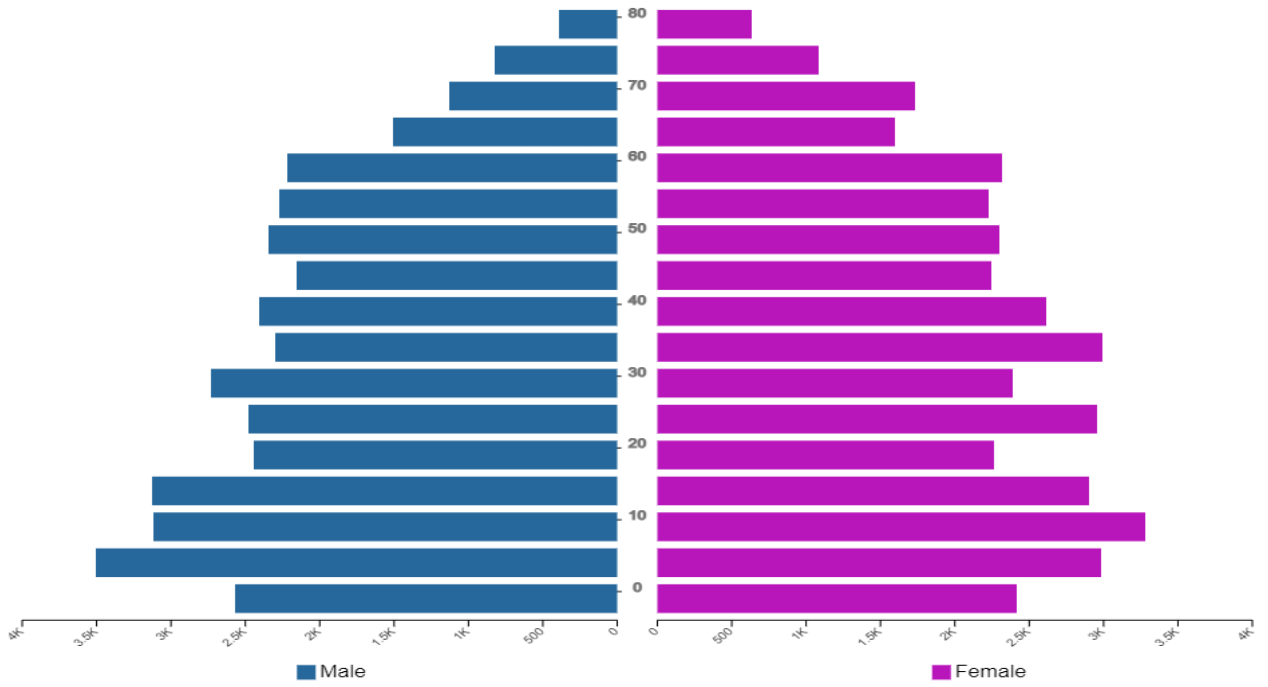
4. Age Distribution:

- The median age in Racine is 34.7 years.
- For males, the median age is 32.9 years.
- For females, the median age is 36.2 years.

These statistics provide a snapshot of Racine's demographic and economic landscape. The declining population, coupled with economic indicators such as household income and poverty rate, can be crucial factors for policymakers and community leaders to consider when planning for social and economic development. Additionally, housing statistics and age distribution provide insights into the city's housing market and age demographics. According to the most recent ACS, the racial composition of Racine was:

Race	Population	Percentage (of total)
White	47,443	61.06%
Black or African American	17,612	22.67%
Two or more races	8,227	10.59%
Other race	3,450	4.44%
Asian	590	0.76%
Native American	369	0.47%
Native Hawaiian or Pacific Islander	14	0.02%

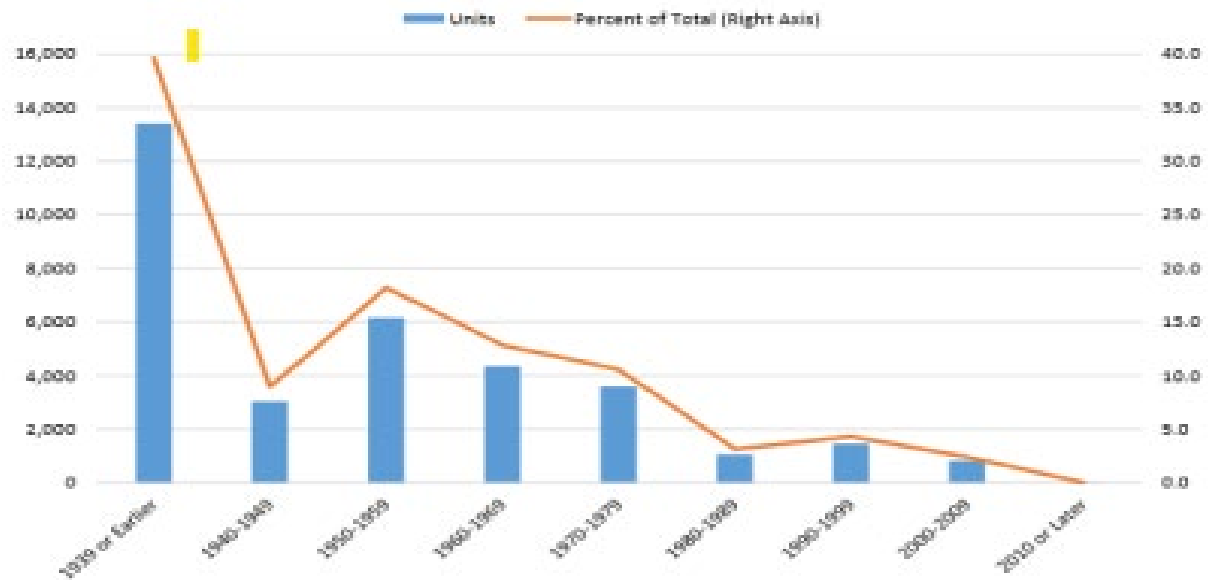
Racine Population Pyramid 2023



Housing in the City of Racine

Housing Units by Year of Construction
City of Racine, WI

Table 1



Housing Strengths & Weaknesses

	Strength	Neutral	Weakness
The availability of affordable rental housing	12%	36%	53%
Housing that appeals to young professionals	12%	41%	47%
The availability of affordable homes for purchase	18%	36%	46%
Quality of housing	14%	39%	46%
Range of housing options	17%	40%	43%
The value of homes	21%	48%	31%
Housing options for seniors	19%	52%	29%

Consultation

Two-Phase Consultation Process:

- 1. Phase 1 - Introduction and Outreach (December 2021):**
 - Staff presented HOME ARP funding at the City and County of Racine Continuum of Care meetings.
 - Solicited comments, both written and verbal, during this phase.
 - Introduced HOME ARP to the larger continuum.
- 2. Phase 2 - Specific Feedback Gathering (March 2022):**
 - Hosted a Zoom meeting with the Continuum of Care (C.O.C) steering committee.
 - Engaged with specific groups to solicit comments:
 - Virtual Meetings via Zoom or Written Correspondence:
 - C.O.C, Hope Center, Hospitality Center, Racine Vocational Ministries, Lutheran Social Services, Safe House, Women’s Resource Center, Bethany Apartments, Racine Revitalization Partnership, and Legal Action of Wisconsin.
 - Organizations requested permanent supportive housing for individuals with disabilities or senior citizens.
 - Email or Phone Communication:
 - Career Industries, Society Assets, Racine Housing Authority, Gorman Property Development, the Center for Veterans Issues, HALO, and St. Vincent De Paul.
 - Feedback received emphasized the need for more support services and affordable housing.
 - In-Person Meetings:
 - Veteran’s Outreach of Wisconsin, Fight to End Exploitation, and Racine-Coordinated Entry.
 - Expressed the need for smaller permanent housing with attached supportive services.

Specific Feedback from Agencies:

- **Permanent Supportive Housing:**
 - Organizations like C.O.C, Hope Center, Hospitality Center, and others requested permanent supportive housing for individuals with disabilities or senior citizens.
- **Support Services and Affordable Housing:**
 - Feedback from Career Industries, Society Assets, Racine Housing Authority, Gorman Property Development, the Center for Veterans Issues, HALO, and St. Vincent De Paul emphasized the need for more support services and affordable housing.
- **Smaller Permanent Housing with Supportive Services:**
 - Veteran’s Outreach of Wisconsin, Fight to End Exploitation, and Racine-Coordinated Entry expressed the need for smaller permanent housing with attached supportive services.

This comprehensive consultation process and engagement with a variety of organizations have provided valuable insights into the specific needs and priorities of the community. The feedback received from these interactions will play a crucial role in shaping the HOME-ARP plan to address the unique challenges and requirements of the City of Racine.

Public Participation

1. Comment Period and Public Hearing:

- The public comment period for the HOME ARP Plan took place from February 24, 2023, to March 13, 2023.
- A public hearing was hosted on March 13, 2023, during the evening Community Development Block Grant (CDBG) meeting.

2. Notification Methods:

- Public participation was noticed through:
 - Newspaper publication.
 - City of Racine social media.
 - Direct emails to the City of Racine Outreach list for Annual Action Plans and Consolidated Plans.

3. Continuum of Care (C.O.C) Meetings:

- City staff actively participated in all Continuum of Care meetings (Racine, WI 502) via Zoom.
- Feedback and notes were gathered on the needs of at-risk and homeless residents in the City of Racine during these meetings.

4. Direct Meetings with Organizations:

- City staff conducted direct meetings with organizations like Racine and Kenosha Vocational Ministry and HALO, both in-person and via Zoom.
- These meetings aimed to gather more detailed information on the specific needs of the community.

Efforts to Broaden Public Participation:

1. Targeted Emails:

- City staff created targeted emails to all service providers, ensuring a wide range of stakeholders were informed and invited to participate.

2. Monitoring Visits:

- Time was set aside during yearly monitoring visits with grantees receiving other funds (ESG, HOME, CDBG) to gather additional feedback on the needs within the City of Racine.

3. Collaboration with Mayor's Office Communication Staff:

- Collaboration with the Mayor's Office Communication staff to leverage social media and other City publications for broader outreach within the City of Racine.

Summary of Public Comments:

• Quantity of Comments:

- No comments or recommendations were received from the public during the public participation period from February 24, 2023, through March 13, 2023.

This summary reflects the proactive efforts made by the City of Racine to engage the public in the planning process for the HOME ARP Plan. Although no public comments were received during the specified period, the extensive outreach and collaboration with various stakeholders demonstrate a commitment to transparency and inclusivity in the decision-making process.

Needs Assessment and Gaps Analysis

Qualifying Populations' Needs and Gaps

The city will use the Coordinated Entry System with multiple access points for referral.

- Applications submitted directly to the project will be forwarded to the Coordinated Entry Program and ranked accordingly.
- Screened applicants will then be referred for housing through this system.

Qualifying Populations 1 - Homeless

The definition of homelessness, as provided in [24 CFR 91.5 Homeless \(1\), \(2\), or \(3\)](#):

(Code of Federal Regulations), typically includes individuals and families lacking a fixed, regular, and adequate nighttime residence. This can encompass a range of situations, including living on the streets, in shelters, or temporary and transitional housing.

Homelessness Statistics in Racine (2022):

1. Point in Time Count:

- Identified 5 households living on the street.
- Identified 188 households living in shelters.
- A total of 193 homeless households in Racine.

2. HOPES Center Outreach Program:

- Typically encounters 5 to 11 households living on the streets of Racine.

3. HALO (Homeless Assistance Leadership Organization):

- Indicates that the number of "leavers" (those exiting the program) is slightly lower than the number of entrants.
- Houses approximately 160 people per night.

Challenges and Implications:

1. Adequate Bed Spaces:

- HALO notes a lack of adequate bed spaces, which may result in challenges in accommodating the homeless population.

2. Utilization of Hotel Vouchers:

- Due to the insufficient bed spaces, there is a need to utilize hotel vouchers to provide temporary shelter for individuals and families experiencing homelessness.

3. People Sleeping on the Floor:

- The shortage of available bed spaces may lead to situations where individuals have to sleep on the floor, highlighting the strain on existing resources.

Overall Impact:

The data from the Point in Time count, outreach programs, and HALO's insights collectively depict a homelessness situation in Racine. While efforts are made to provide shelter and assistance, challenges such as the lack of adequate bed spaces and the need for hotel vouchers indicate the complexity of addressing homelessness in the community. Understanding the specific dynamics and challenges can inform targeted strategies to improve housing stability and support for those experiencing homelessness.

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	85	25	118	16	40								
Transitional Housing	28	9	43	9	40								
Permanent Supportive Housing	20	6	120	25	85								
Other Permanent Housing	85	25	36	25	6								
Sheltered Homeless						77	34	40	121				
Unsheltered Homeless						0	5	1	0				
Current Gap										77	52	5	5

Qualifying Populations 2 – At Risk of Homelessness

At-Risk of Homelessness:

1. Definition (24 CFR 91.5):

- Outside of McKinney Vento Qualified Households, local partners provide additional insights.

2. Local Assistance Programs:

- Wisconsin Emergency Rental Assistance (WERA) Program:
 - Provided housing assistance for rent, late fees, security deposit, and utility fees.
 - Fielded approximately 6,000 phone calls for assistance in 2022.
 - Assisted 4,046 households, with a pending 600-700 requests.
 - Indicates at least 4,746 households were housing unstable in Racine County.
- Families in Transition Team Racine Unified School Districts (RUSD):
 - Reported 690 students in 2022 requiring services under McKinney-Vento.
- Here to Help Program (City-Funded):
 - Assisted 264 households with rental assistance.
- St. Vincent De Paul:
 - Provided services to 896 households "at risk" in 2022.
 - Note: Not all households were at risk of homelessness.

The information highlights critical unmet needs in terms of suitable housing units, particularly for different household sizes, and the challenges associated with housing vouchers. Additionally, there is a strong consensus among service providers on the importance of supportive services for successful housing transitions. The data on at-risk populations and assistance programs underscore the scope of housing instability in the community, emphasizing the need for comprehensive solutions and continued support services.

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	19,150		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	960		
Rental Units Affordable to HH at 50% AMI (Other Populations)	5,360		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		2,975	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		690	
Current Gaps			9165

Summary and Analysis of the City of Racine's Homeless and Housing Situation:

Unmet Needs and Challenges:

1. Wisconsin Emergency Rental Assistance Program:

- Stopped accepting applications as of January 31, 2023.
- Served over 4,000 households with 700 awaiting screening.
- The return rate for further assistance is about 35%, indicating potential gaps in follow-up services.

2. Doubled-Up Families:

- Doubled-up families are at higher risk of homelessness post-rental assistance programs tapering off.

3. Economic Fragility and Inflation:

- Increased calls for services, attributed to the fragility of the economy and rising inflation.

4. Lack of Follow-Up Services:

- Critical need for follow-up services for households transitioning from homelessness to housing.
- Follow-up services reported to be not happening as much as needed.

5. Veteran-Specific Challenges:

- VA has unused housing vouchers due to inadequate housing conditions.
- City-specific veteran housing initiatives in place, such as Tiny Homes.

6. Capacity and Specialized Staff:

- Nonprofit organizations lack capacity for more cases and need specialized staff for housing-related case management.

7. Retaliation Risks:

- Inspection and repairs by the Neighborhood Enhancement Team may lead to retaliatory actions by property owners.

Qualifying Populations 3 – Fleeing, or attempting to flee, Domestic Violence, Dating Violence, Sexual Assault, stalking, or Human Trafficking, as defined by HUD

Specific Populations:

1. Domestic Violence, Dating Violence, Sexual Assault, Stalking, and Human Trafficking:

- Women’s Resource Center is our local Domestic Violence Service Provider. They have space for 58 people in their shelter and are often at capacity. During 2022, WRC reported that 227 unmet requests for shelter. In 2022, the crisis hotline for Domestic Violence, Sexual Assault, and Human Trafficking received 1,231 calls and 631 of those calls merited a crisis response.
- In 2022 a total of 126 households (86 without children, and 40 with children) staying in emergency shelter (City and County) reports a history of domestic violence this is about 22% of the total population served by emergency shelter. These numbers do not include Domestic Violence Specific Shelters.
- The Fight to End Exploitation has identified Human Trafficking in all 72 Wisconsin Counties. Since 2007, according to the National Human Trafficking Hotline, there has been a total of 596 cases of human trafficking in Wisconsin. The Fight to End Exploitation explained that it is hard to narrow down specific geographic areas of calls due to the nature of movement within Human Trafficking.
- The corridor between Chicago to Milwaukee is a known trafficking route which encompasses much of the Midwest. The City of Racine has high unemployment and other social economic factors which make it a target location for traffickers to find victims. WI also has a high rate of forced labor due to the agriculture nature of the state.

Qualifying Populations 4 – Other Populations under Section 212(a) of NAHA

1. For populations falling under Qualifying populations 4, where providing supportive services or assistance is mandated under section 212(a) of the National Affordable Housing Act (NAHA), multiple referral methods will be employed.
2. The Coordinated Entry list, managed by the Continuum of Care (CoC) program, will be a central point for referrals.

3. A team of service providers, including those catering to qualifying population #4, will be involved in decision-making.
4. Regular meetings will be held to expand the team, ensuring representation from service providers of Qualifying Population #4.
5. ICA, responsible for managing the data system for the Coordinated Entry list, has agreed to create special referral points and data collection for the program.
6. Collaboration with Racine County is underway to set up a system for at-risk and housing-unstable populations, extending the referral network.

Veterans:

- Veterans and families that include a veteran family member that meet the criteria in one of one of the qualifying populations.
- Data from local agencies
 1. 2022 Point in Time count identified 40 homeless veterans.
 2. Challenges in utilizing available housing vouchers due to housing conditions.

Students and Families Data:

- Racine Unified School District identified 690 homeless students in 2022.
- Doubled and tripled up family's ineligible for certain services.

Service Providers and Programs:

1. Existing Resources:

- Numerous organizations provide housing assistance, shelter, and services.
- Continuum of Care offers Rapid Rehousing, emergency shelter beds, non-congregate shelter beds, and Permanent Supportive Housing.

2. Gaps in Shelter and Housing Inventory:

- No non-congregated shelter beds available.
- Gap in permanent supportive housing.

3. Supportive Services:

- Supportive services are critical for housing stability, demonstrated by positive outcomes in managed properties.

Priority Needs:

• **Affordable Rental Units and Supportive Services:**

- Affordable rental units identified as a critical need.
- Supportive services, including follow-up, are crucial for successful housing transitions.

Determination of Need and Gaps:

The level of need and gaps was determined through a comprehensive analysis of various data sources, including Comprehensive Housing Affordability Strategy (CHAS), American Community Survey (ACS), Point in Time Data, Housing Inventory Count, Homeless Management Information Systems (HMIS), and localized data from service providers. Outreach efforts, consultation with organizations, and feedback from service recipients aided understanding the unique challenges

faced by different populations. Identified gaps include a shortage of affordable rental units, insufficient supportive services, and challenges in the existing shelter and housing inventory. The determination of these needs and gaps will steer the development and improvement of programs and initiatives to address homelessness and housing instability in Racine.

Summation of Qualifying Populations:

The City is exploring opportunities to involve the Racine County Housing Authority (RCHA) in the referral process. While RCHA is already a partner with coordinated entry for homeless-specific vouchers, efforts are being made to expand this collaboration. RCHA's participation will include not only homeless-specific vouchers but also regular housing vouchers, VASH (Veterans Affairs Supportive Housing), and project-based vouchers.

Any housing provider will be encouraged to share openings with the Coordinated Entry, fostering a broader and more inclusive referral network for housing services.

Overall, these referral methods aim to establish an effective and comprehensive system that goes beyond addressing homelessness, extending support to various populations in need of housing services across the City.

Local Source Data

1. Racine Unified School District – Homeless Services. Homeless for purposes of education is considered doubled up, this allowed for tracking “at risk of homelessness.”
2. Racine Kenosha Community Action – Wisconsin Emergency Rental Assistance. This agency administers Emergency Rental Assistance, which shows the number of households needing assistance, the gap in households receiving assistance, and the continued need for assistance.
3. Veterans Affairs – Homeless Assistance data has shown that Racine County has 69 VASH Vouchers, 42 are currently in use and there are 27 unused vouchers in the county.
4. Women’s Resource Center and Bethany Apartments maintain data on Domestic Violence/Dating Violence/Sexual Assault/Stalking and can show both the direct and unmet needs of the population. Both groups are part of the Anti-Human Trafficking Coalition and have some limited data for the City of Racine. It is difficult to provide local Human Trafficking Data according to the Women’s Resource Center because victims are moved from location to location and not in a central place.
5. The Hospitality Center provided further information about households that are at risk, based on their community meal programs and other service requests.

HOME-ARP Activities

Proposals/Funding

The City of Racine has outlined its process for soliciting and evaluating proposals for the allocation of HOME-ARP funds. The PJ will not administer eligible activities directly.

The process involves the following key steps:

- 1. Request for Proposals/Qualification (RFP)/RFQ:**
 - The City will release an RFP/RFQ, inviting organizations to submit proposals that align with the guidelines set for HOME-ARP funds.
- 2. Full Applications:**
 - Interested applicants will be required to submit full applications, providing detailed information on their proposals, and ensuring that they adhere to the specified guidelines.
- 3. Review by staff:**
 - Fully completed applications will be reviewed and evaluated by staff and/or other delegates.
- 4. Recommendations:**
 - Staff will make recommendations based on their assessments of the proposals to the Community Development Block Grant Advisory Board (the Board).
 - The Board will submit their determination of award based on those recommendations to the Common Council for final consideration.
- 5. Common Council Approval:**
 - Once final approval has been announced a contract may be entered into.

This process makes sure that HOME-ARP funds are allocated transparently and responsibly. The Advisory Board thoroughly evaluates proposals, and the Common Council gives the final approval to ensure the chosen projects align with the program's goals.

Utilization of HOME-ARP Funds for Eligible Activities:

- HOME-ARP funds will be administered in accordance with this plan and HUD HOME ARP rules and guidelines.
- Based on HUDs CPD Notice 21-10 the following eligible activities are supported:
 - Production or Preservation of Affordable Housing.
 - Tenant-Based Rental Assistance (TBRA).
 - Supportive Services, encompassing services defined at 24 CFR 578.53(e), Homeless Prevention Services, and Housing Counseling.
 - Purchase and Development of Non-Congregate Shelter, which can be utilized for various purposes, including emergency shelter, permanent housing, or affordable housing.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 960,136		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 600,000		
Non-Profit Operating	\$ 104,008	5 %	5%
Non-Profit Capacity Building	\$ 104,008	5%	5%
Administration and Planning	\$ 312,026	15 %	15%
Total HOME ARP Allocation	\$ 2,080,178		

Most homeless service agencies have not developed or managed affordable housing in the past and will need to develop capacity and have sufficient operating funds to bring a development off the ground. Many of the local agencies stated they have thought of doing development in the past, but did not feel they had the capacity to do so. They stated “it is a large undertaking and may not be possible with such a small budget.

Distribution of HOME-ARP Funds by Priority Needs:

1. Priority for Scattered or Larger Building Housing:

- The City of Racine prioritizes the construction or rehabilitation of housing in scattered sites or as part of larger buildings.
- Emphasis on creating housing options that cater to larger families and single households.

2. Requirement for On-Site Supportive Services:

- All permanent supportive housing created with HOME-ARP funds will require on-site supportive services.
- Recognizing the critical link between housing stability and on-site support for vulnerable populations.

3. Focus on Larger Family Housing and Smaller Housing for Single Households:

- Addressing the specific needs identified in the needs assessment and gap analysis, with a focus on larger family housing and smaller housing options for single households.
- Aligning fund distribution with the identified demand in the local housing market.

4. Response to Increased Rental Costs and Market Changes:

- Acknowledging the impact of COVID-19 on the rental market, with a noticeable increase in rental housing prices and reduced housing market fluidity.
- Recognizing the correlation between decreased housing mobility and rising rent costs, highlighting the need for affordable and stable rental options.

5. Data on Emergency Rental Assistance:

- Utilizing data from the Wisconsin Emergency Rental Assistance program, which received applications from approximately 8% of the City of Racine's population (~6,000 people) in 2022.
- Demonstrating the demand for rental assistance and the need for safe, decent, and affordable rental housing.

Rationale for Funding Eligible Activities:

1. Lack of Safe, Decent Affordable Housing:

- HMIS data indicates an average of approximately 955 people served from 2020 to the current period.
- Identifying a significant gap in available units for homeless households, highlighting the need for additional housing options.

2. Steady Demand for Homeless Services:

- Despite capacity and funding limitations, the number of households served through homeless services has remained fairly steady.
- Indicates consistent demand for homeless services, further emphasizing the need for expanded housing solutions.

3. Correlation between Housing Stability and Supportive Services:

- Acknowledging the role of supportive services in maintaining housing stability.
- Supporting the requirement for on-site supportive services in permanent supportive housing, aligning with the identified needs.

4. Strategic Approach to Allocation:

- The plan strategically allocates funds to address the identified gaps and prioritize the creation of housing that meets the specific needs of the City of Racine's population.
- Responding to market changes and ensuring that HOME-ARP funds contribute to creating a more resilient and stable housing environment.

The distribution plan for HOME-ARP funds is grounded in a thorough analysis of local needs, market dynamics, and the characteristics of the housing inventory and service delivery system. It reflects a commitment to addressing identified gaps, providing safe and affordable housing options, and ensuring the integration of supportive services for vulnerable populations.

HOME-ARP Production Housing Goals

At the time of Plan submission, the city did not find it necessary to use a preference or limitation. However, if specific projects are proposed, the city will take action to amend the plan. This amendment will address any identified unmet needs or gaps in benefits and services for other qualifying populations. The City of Racine is estimating up to 6 units. This number may change based on unit sizes and needs for development.

Approach to Safe and Affordable Housing:

1. Focus on Significant Challenges:

- Target Population: Low-income and housing-insecure households facing significant challenges.
- Objective: Address both short-term housing stabilization and long-term affordability for individuals and families.

2. Increase in Housing Units:

- Strategic Priority: Prioritizing the increase of housing units to cater to temporary and long-term housing needs.
- Outcome: Aims to provide a comprehensive solution to housing insecurity by addressing both immediate and sustained housing challenges.

3. Supportive Services Enhancement:

- Objective: Strengthening supportive services to assist households in overcoming barriers to stable housing.
- Rationale: Recognizing that additional assistance is often required to address multifaceted challenges faced by housing-insecure households.

4. Long-Term Affordability:

- Strategic Planning: Ensuring that new non-congregate shelter units remain affordable for a significant period.
- Impact: Enables the City to assist a substantial number of people experiencing homelessness over an extended timeframe.

5. Preference Approach:

- If a preference is later determined to be necessary, all applicable HUD HOME-ARP guidelines will be followed.

Refinancing Guidelines:

1. Focus on New Construction:

- Intention: Allocate HOME-ARP funds primarily to new construction projects.
- Objective: Facilitate the creation of additional affordable rental units and supportive services.

2. Exclusion of Existing Debt Refinancing:

- Guideline: No intention to allocate funding for the refinancing of existing debt secured by multifamily rental housing undergoing rehabilitation with HOME-ARP funds.
- Emphasis: Concentration on new construction rather than the rehabilitation of existing units.

The City of Racine's approach underscores a commitment to addressing the diverse and evolving needs of low-income and housing-insecure populations. By strategically combining temporary housing solutions, long-term affordability, and enhanced supportive services, the plan aims to provide a holistic response to the challenges faced by vulnerable households. Additionally, the focus on new construction aligns to expand the housing inventory to better meet the demands of the community.

Limitations in a HOME-ARP

Limitations on Eligibility in HOME-ARP Projects:

1. General Principle:

- Non-Imposition Unless Necessary:
 - PJs (Participating Jurisdictions) should refrain from imposing limitations on eligibility unless deemed necessary to address a significant gap in effective housing, aid, benefit, or services within the PJ's geographic area.
 - The use of limitations should only be considered if preferences are insufficient to address identified gaps.

2. Justification Requirement:

- Necessity and Justification:
 - A limitation on eligibility must be justified in the HOME-ARP allocation plan.
 - The justification should be rooted in the PJ's priority needs, as outlined in its needs assessment and gaps analysis.

4. Avoidance of Violations:

- Fair Housing, Civil Rights, and Nondiscrimination:
 - Any limitation imposed must be carefully examined to avoid unintended violations of fair housing, civil rights, and nondiscrimination requirements.
 - Ensuring compliance with all applicable laws and regulations is paramount.

5. Holistic Addressing of Needs:

- Project Undertakings:
 - HOME-ARP funds allocated by the City of Racine will be strategically used to address the needs of all qualifying populations.
 - Various projects will be initiated to comprehensively tackle identified housing challenges.

6. Commitment to Compliance:

- Fair Housing Commitment:
 - The City of Racine emphasizes a commitment not to violate any applicable fair housing, civil rights, and nondiscrimination requirements during the implementation of HOME-ARP projects.
 - Ensuring adherence to legal and ethical standards is a foundational principle.

7. Coordination with Other Funding Sources:

- Eligibility Requirements Alignment:
 - Any restriction on eligibility tied to other funding sources in a project receiving HOME-ARP funds must be justified and aligned with the overall goals and priorities outlined in the HOME-ARP allocation plan.

In summation, the City of Racine, in the utilization of HOME-ARP funds, emphasizes a meticulous and principled approach to determining eligibility limitations. The primary focus is on establishing partnerships with projects that demonstrate optimal efficiency in engaging all four qualifying populations. This approach reflects the city's overarching commitment to addressing identified gaps in unmet needs while adhering strictly to fair housing, civil rights, and nondiscrimination requirements.

The city's strategy is driven by a commitment to prioritize and align with its specific needs, ensuring a comprehensive and inclusive approach to tackling housing challenges within the community. By carefully selecting projects that are not only effective but also aligned with the city's priorities, the aim is to create a strategy that not only meets the requirements of the HOME-ARP program but also serves as a meaningful and impactful response to the diverse housing needs of the community. This thoughtful and strategic utilization of funds underscores the city's dedication to fostering equitable and accessible housing opportunities for all residents.

Appendix A

Organization Name	Type of Agency/Org
Veteran's Outreach	Veteran's Services – Outreach and work with homeless veterans and at risk of homelessness
C.O.C	Continuum of Care – Coordinator of services for homeless response
Hope Center	Homeless service provider – street outreach and day program for homeless on the streets
Hospitality Center	Homeless service provider – Day program for homeless and case management services
Racine Vocational Ministries	Homeless service provider – work with ex-offenders for employment services and lifestyle change
Homeless Assistance Leadership Organization	Homeless service provider – Emergency shelter
Lutheran Social Services	Homeless service provider – provider of Rapid Rehousing, some permanent housing, and homeless prevention
Safe Haven	Homeless service provider
Women's Resource Center	Domestic violence service provider – Emergency Domestic Violence Service provider.
Bethany Apartments	Domestic violence service provider – Transitional Housing for survivors of domestic violence.
Racine Revitalization Partnership	Community Housing Development Organization – Nonprofit developer of affordable housing in Racine.
Career Industries	Disability Services – Career Placement, sheltered workshop, disability services.
Society Assets	Needs of persons with disability
Metropolitan Fair Housing	Fair Housing & Civil Rights
Housing Authority	The Needs of Qualifying Populations
Gorman Property Development	Developer – Low Income Housing Tax Credit Developer and Property Management
Racine Coordinated Entry	Housing Placement and assessment services for homeless households in Racine.
St. Vincent De Paul	Rental assistance and advocacy.
Fight to End Exploitation	Supportive Housing
Center for Veterans Issues	Veterans Groups, Homeless Service Providers
Legal Action of Wisconsin	Address Fair Housing & Civil Rights