

SEPTEMBER 12, 2022

# HOME-ARP ALLOCATION PLAN

## SUBSTANTIAL AMENDMENT TO THE FY21 ACTION PLAN



CITY OF SPRINGFIELD  
OFFICE OF HOUSING  
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## INTRODUCTION

The 2021 [American Rescue Plan Act](#) (ARPA) provides \$5 billion in ARPA funds to be administered by the U.S. Department of Housing and Urban Development (HUD) through the HOME Investment Partnerships Program (HOME) to address the critical need for homelessness assistance and supportive services across the country. As a HOME program participating jurisdiction, the City of Springfield has been awarded \$6,066,102 of HOME-ARP funds to benefit our community's qualifying populations. HUD issued guidance for the utilization of the HOME-ARP funds through [CPD-Notice 21-10](#) on September 13, 2021. HOME-ARP funds are a one-time allocation and must be spent by September 30, 2030.

HOME-ARP funds may be used for the following activities:

1. Planning and administration of the HOME-ARP Program
2. Development of affordable rental housing
3. Tenant-based rental assistance
4. Provision of supportive services
5. Acquisition and development of non-congregate shelter
6. Nonprofit capacity building and operating assistance

HOME-ARP funds must be used to primarily benefit individuals or families in the following qualifying populations:

1. Homeless, as defined in 24 CFR 91.5 *Homeless* (1), (2), or (3)
2. At risk of homelessness, as defined in 24 CFR 91.5 *At risk of homelessness*
3. Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking (as defined by HUD in 24 CFR 5.2003) or human trafficking (as outlined in the Trafficking Victims Protection Act of 2000 as amended [22 USC 7102]); and
4. Other populations, where providing supportive services or assistance under section 212(a) of the National Affordable Housing Act 42 USC 12472(a) would prevent a family's homelessness or serve those with the greatest risk of housing instability.

This plan describes the City's intended use of these funds.

## CONSULTATION

Prior to development of the HOME-ARP Allocation Plan, the City of Springfield Office of Housing consulted with the Springfield-Hampden County Continuum of Care (CoC), homeless and domestic violence service providers, veterans' groups, public housing agencies, public agencies that address the needs of the qualifying populations, and public/private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

### Consultation Process Summary

The Office of Housing consulted with stakeholders in a number of settings:

- Meeting with Youth Action Board , January 20, 2022
- Meeting with CoC Board of Directors, April 1, 2022
- Meeting with Family Services Committee of the Western Mass Network to End Homelessness (WMNEH), July 11, 2022
- Meeting with Individual Services Committee of the WMNEH, July 19, 2022

- Series of telephone calls July 18-August 1, 2022
- Community Roundtable, Wednesday, July 20, 1-2:30 pm

## Organizations Consulted

The organizations consulted before development of this HOME-ARP Allocation Plan are listed in Table 1.

**Table 1: Organizations Consulted**

Organization Consulted	Type of Organization	Method of Consultation
Springfield-Hampden County Continuum of Care	Continuum of Care	CoC Board Meeting
Springfield Youth Action Board (YAB)	Formerly homeless young adults	YAB Meeting
Caregiver Homes	Community organization providing support for family caregivers	Community Roundtable
Catholic Charities	Homeless service provider	CoC Board Meeting
Clinical Support Options- Friends of the Homeless	Homeless service provider, Behavioral health provider	CoC Board Meeting, Individual Services Committee Meeting, Community Roundtable, Phone conversation with agency leadership
Center for Human Development	Homeless service provider, Behavioral health provider, Organization that addresses needs of persons with disabilities	Family Services Committee Meeting, Community Roundtable
Central West Justice Center	Legal services organization	Community Roundtable
Christina's House	Homeless Service Provider	Community Roundtable
Community Legal Aid	Legal services provider	Conversation with staff
Darrell Lee Jenkins Jr Families of Homicide Resource Center	Community organization	Community Roundtable
Eliot Community Human Services	Homeless service provider, Behavioral health provider	Individual Services Committee Meeting
Gandara Center	Homeless service provider, Behavioral health provider, Organization that addresses needs of persons with disabilities	CoC Board Meeting, Community Roundtable, phone conversation with senior staff
Hampden County Sheriff's Dept. - AISS	Public agency - After-Incarceration Support	Community Roundtable
Home City Development	Housing developer	Community Roundtable
Housing Resource Management Inc.	Housing management	Community Roundtable
MassHire	Workforce Training	CoC Board Meeting
MA Dept of Mental Health	Public agency	Individual Services Committee Meeting, Community Roundtable
Massachusetts Fair Housing	Fair Housing Organization, Civil Rights Organization	Phone conversation with Executive Director
Men of Color Health Awareness (MOCHA)	Community health education program	Community Roundtable

Mental Health Association	Homeless service provider, Behavioral health provider, Organization that addresses needs of persons with disabilities	CoC Board Meeting, Community Roundtable, Conversation with senior staff
New North Citizens Council	Homeless service provider, Provider serving HIV+ population	CoC Board Meeting
Open Pantry Community Services	Homeless service provider, Case management provider	CoC Board Meeting
Parent Villages	Community organization supporting families and education	Community Roundtable
Public Health Institute of Western Massachusetts	Public health convening and advocacy organization	Community Roundtable
River Valley Counseling Center	Homeless service provider, Behavioral health provider, Provider serving HIV+ population, Organization that addresses needs of persons with disabilities	CoC Board Meeting, Community Roundtable
ROCA Western Mass	Community organization serving justice-involved youth	Community Roundtable
Shriner's Hospital	Healthcare provider	Community Roundtable
Springfield Department of Elder Affairs	Public agency	Community Roundtable
Springfield Housing Authority	Public housing authority	Phone conversation with Executive Director, Community Roundtable
Springfield Partners for Community Action	Community Action Agency	Community Roundtable
Springfield Police Department	Public agency	Individual Services Committee Meeting, Community Roundtable
Springfield Comprehensive Treatment Center	Substance use treatment provider	Community Roundtable
Springfield Rescue Mission	Homeless Service Provider	Community Roundtable
Valley Opportunity Council	Community Action Agency, Homeless service provider	Community Roundtable
Springfield Public Schools	Public agency	CoC Board Meeting
Springfield Technical Community College	Community college	Community Roundtable
US Department of Veterans Affairs	Public agency	Community Roundtable
Way Finders	Regional housing authority, Affordable Housing developer, Fair Housing organization, Homeless service provider, Provider of housing assistance to at-risk community	CoC Board Meeting, Family Services Committee Meeting, Individual Services Committee Meeting, Community Roundtable, Phone conversation with agency leadership
YWCA of Western Massachusetts	Domestic Violence service provider	Phone conversation with agency leadership

## Summary of Input

Stakeholders throughout the community emphasized the pressing need for affordable housing, pointing to a large gap between the amount of affordable units and the number of people in need of affordable housing. In particular, the community cited a need for subsidized units available to extremely low-income households.

Many comments described the impact of Springfield's changing housing market. Over the last few years, availability of rental units has become limited, and rents have increased. It has become challenging to find units to rent at or below Fair Market Rent (FMR). The rise in rent has made it more difficult to find units to rent with assistance from rental assistance programs, such as the Housing Choice Voucher Program and the Massachusetts Rental Voucher Program (MRVP). It is even more difficult to find property owners willing to accept time-limited rental assistance programs, such as the state's HomeBASE program, or other rapid rehousing programs. Providers indicated that there has been an increase in people seeking assistance with housing search.

Stakeholders specifically noted a lack of accessible units.

Many consultation participants identified the need for permanent supportive housing (PSH). Most of Springfield's existing stock of PSH uses a scattered site model. Stakeholders identified a need for some PSH units to be clustered and combined with on-site staffing. Providers of existing low-income housing identified the need for resident support services in their housing sites that serve high-need populations.

Populations identified by stakeholders as having high or priority needs include chronically homeless, survivors of human trafficking, homeless young adults, people with a criminal record who are barred from housing opportunities, people exiting residential substance treatment programs and corrections, homeless people with complex or high health-care needs, and survivors of domestic violence. In addition, while there have been significant resources targeted to homeless veterans, veterans with criminal backgrounds still struggle to find housing that will take them.

Providers noted that an infusion of new resources became available during COVID. While the resources were much needed, the homeless and housing response system was strained due to high client demand and the need to create new programs quickly. Provider agencies have found that hiring and retaining staff has become a challenge. For people seeking assistance, there have been long wait times and frustration in trying to access overwhelmed programs.

Information obtained from the consultation process has informed the plan's analysis of needs and gaps and is detailed in sections throughout the plan. Notes from consultations are provided in Appendix B.

## PUBLIC PARTICIPATION

The City published a draft plan with a comment period in order to provide the public with an opportunity to comment on its proposed HOME-ARP allocation plan.

### Public Participation Process

On July 18, 2022, the City published a notice regarding the upcoming availability of the draft HOME-ARP allocation plan in *The Republican*, Springfield's paper of record. The draft plan was available for review online at <https://www.springfield-ma.gov/housing>, and a printed copy of the draft plan was available to the Springfield Office of Housing, 1600 E. Columbus Ave., Springfield, MA.

The plan was available for review and comment from August 3, 2022, through September 2, 2022, and the City held two public hearings on the draft plan:

- Tuesday, August 16, 2022, 5 pm, via Zoom, which was attended by 6 people
- Wednesday, August 17, 2022, 2 pm, via Facebook Live, which was presented in English and Spanish, and was viewed by 325 people

### Efforts to broaden public participation

In addition to publication in *The Republican*, notice was also published in *La Voz Hispanica* and *The Metro Record*. Additional outreach was conducted via social media. The draft plan was emailed to an extensive list of community stakeholders.

The draft plan was posted to the City's website in an accessible format.

Notice of the plan's availability was published in English and Spanish, and the Facebook Live hearing was held in English and Spanish. The draft plan provided notice in Spanish of how Spanish-speakers could obtain information about the plan. The draft plan also provided information indicating where to call to learn more about the plan.

### Comments and recommendations received

The City received two comments at the August 16, 2022 public hearing, and two written comments, one of which repeated a comment made at the public hearing.

A representative from Community Legal Aid commented at the public hearing and followed up with written comments. The commenter expressed concern that the Plan does not capture the critical role of affordable free legal services that help low-income individuals and families facing homelessness access and remain in safe, stable housing. The commentor indicated that legal aid is a key piece of the supportive services umbrella that is essential to Springfield's vulnerable community members, and advocated for the City to provide HOME-ARP funds to CLA to support the organization's core work and mission to advocate for the underserved and help it meet the increasing demand for our services. *Response: The City agrees that free legal services has a critical role in keeping low-income households housed, and has added the data provided by Community Legal Aid to the unmet needs summary for the At-Risk population (page 12), and added legal assistance to the identified services gaps listed in Appendix A. This HOME-ARP Allocation Plan does not specify which supportive services the City will fund with HOME-ARP. The City will use the Request for Proposals (RFP) process to identify the specific supportive services programs to be funded.*

A representative from Michael Dias Foundation asked whether sober housing will be an allowable use of the City's HOME-ARP funds. During the public hearing, a representative of the Black Behavioral Health Network also expressed interest in use of the funds for residential recovery homes. *Response: This Plan is not meant to identify specific types of supportive housing that the City will fund; the RFP process will be used to make determinations regarding specific projects. However, potential applicants should note that there are several components of HUD's HOME-ARP guidance that seem to be inconsistent with the requirements of a sober housing project. First, housing developed with HOME-ARP funds must meet the requirements of HUD Notice CPD-21-10, which includes the following rule regarding limiting housing to certain populations: "Recipients may limit admission to or provide a preference for HOME-ARP rental*

*housing...to households who need the specialized supportive services that are provided.... However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.” Persons with Substance Use Disorders (SUD) would meet the requirement for a disability, and there could be a preference for this population if there are specialized supportive services that are provided. However, people with a SUD who are not sober would also benefit from the services provided, so the program would not be able to exclude them. Further, the program would not be able to deny admission based to a disabled person who could benefit from the services offered in the housing based on the fact that their disability is not SUD. Second, the HUD Notice indicates at VI. B. 19. a. and b. that rental housing developed with HOME-ARP funds must have a lease, and that the lease may not require a tenant to accept supportive services that are offered (24 CFR 92.253 (b)(9). Section VI.B.19.c. of the Notice provides that an owner may not terminate the tenancy or refuse to renew the lease of a tenant of a HOME-ARP unit except for serious or repeated violation of the terms of the lease; for violation of applicable Federal, State, or local laws; or for other good cause.*

A representative from Revitalize CDC noted that the data in the plan does not mention that very low-income homeowners who cannot afford to maintain their homes are also at risk of homelessness. The comment notes that this population suffers from poor housing conditions which often result in code violations and harmful home environments that contribute to sickness and injury, and that these homeowners are at risk of institutionalization or homelessness due to health or inability to maintain the home and pay rent/mortgage costs. *Response: This plan does not address this need because home repair is not an allowable use of HOME-ARP funds. Springfield does have very aged housing stock and a significant number of extremely low and low-income homeowners, and has a critical need for home repair assistance for these households. The City has committed \$5 million of American Rescue Plan Act (ARPA) funds to home repair programs.*

## NEEDS ASSESSMENT AND GAPS ANALYSIS

The needs assessment and gaps analysis examines the size and composition of the four qualifying populations, describes current resources available to meet the needs of the population, and identifies unmet needs and gaps in our system. Existing resources are summarized throughout this section, and Appendix C provides detailed tables listing the available resources in Springfield.

### Homeless Population

**Size and Composition.** The CoC conducts an annual point-in-time (PIT) count of people staying in emergency shelters and transitional housing, or living outside or in a place not meant for human habitation. The most recent count, on February 23, 2022, identified 1695 homeless persons in Springfield, including 37 people who were unsheltered that night. The total number of households on the night of the count was 667. Table 2 provides details about the population counted, as well as showing the numbers counted in several subpopulations—veterans, unaccompanied youth<sup>1</sup>, and survivors of domestic violence.

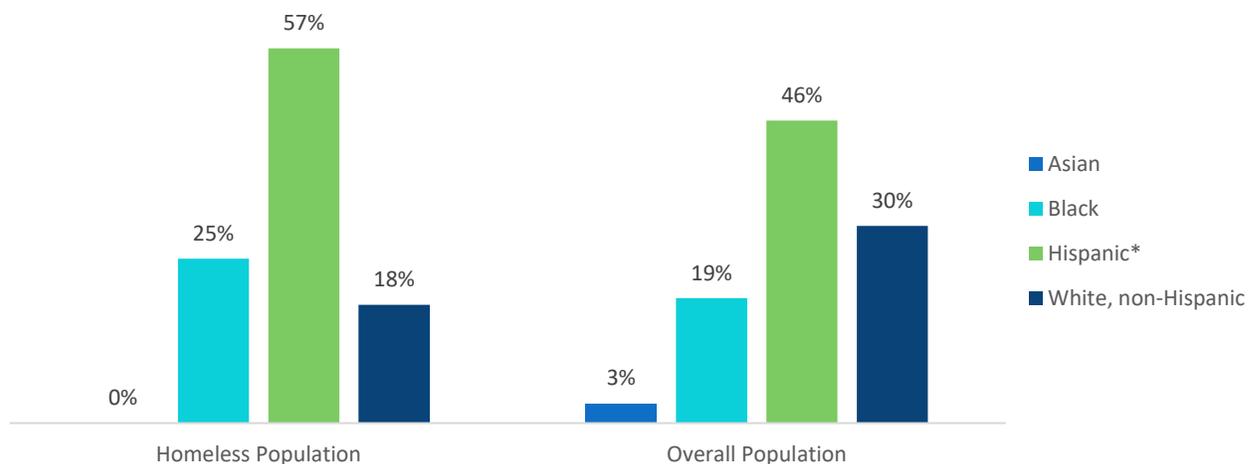
**Table 2: Springfield 2022 Homeless Point in Time Count**

	Homeless Population		Subpopulations		
	In Family Household (w/at least 1 child)	In Adult Household (w/o child)	Veterans	Unaccompanied Youth 18-24	DV Survivors
Sheltered	1387	375	18	88	142
Unsheltered	0	37	3	6	1

Source: 2022 Point in Time Count (PIT)

As is shown in Figure 1, the results of the point-in-time count indicate that in Springfield, Black, Indigenous, and Persons of Color (BIPOC) are disproportionately impacted by homelessness.

**Figure 1: Racial/Ethnic Composition of Homeless Population Compared to Overall Population**



Sources: Hampden County CoC 2022 PIT Count, ACS 2015-2019 5-Year Estimates.

\*Hispanic people may be of any race

<sup>1</sup> The term “unaccompanied youth” means a person under 25 years who is not with a parent, guardian, or other adult 25 or older; this includes both individual young adults and parenting young adults.

One stakeholder noted an increase of families in shelter who have come from Central America and Haiti.

Although the PIT count does not capture data on sexual orientation, national data indicates that lesbian, gay, bisexual, transgender and queer (LGBTQ) people are disproportionately represented in the homeless population, especially among young adults.<sup>2</sup> Providers have also noted an increase in recent years of non-binary and transgender individuals. This year's PIT count identified one non-binary individual and two transgender individuals.

**Existing Resources** Springfield has two emergency shelters for adults without children (one is male only), and one small shelter for young adults 18-24 years old. The primary shelter for individuals is a year-round, 24-hour facility, with services and meals on-site. At various times it reaches capacity, but is able to use some flexible space for overflow.

During the pandemic, Springfield used hotel rooms as shelter. This strategy both allowed for some increased distancing in congregate shelters and accounted for increases in the population that occurred with a slow-down in people able to move from homelessness into housing. Further, the availability of hotel rooms proved to be a valuable tool for engaging vulnerable people who were otherwise unsheltered and could not or would not go to emergency shelter. The strategy proved to be effective in supporting some very long-term homeless individuals to move into permanent housing. The ESG-CV funds that have paid for the hotel shelter program will be exhausted in September 2022.

The Commonwealth of Massachusetts provides emergency shelter to all qualifying homeless families, through a statewide system that expands and contracts according to need. Most family shelter is provided in scattered or clustered apartment units. The family shelter system serves a significant number of pregnant and parenting young adults 18-24.

The CoC has created a triage and assistance system exclusively for young adults experiencing or at risk of homelessness. The system include a phone number that is available 24/7 and is staffed by Housing Navigators who have access to a range of supports to meet a caller's need. Housing Navigators are trained in problem-solving, which can assist with family reunification or support to use existing networks, and have the ability to provide emergency food and transportation assistance, access to shelter and transitional housing, and referral to young adult rapid rehousing and permanent supportive housing programs. This system sees a significant number of LGBTQ and nonbinary young adults, and works hard to create inclusive and welcoming spaces.

Details about shelter and dedicated homeless housing inventory are provided in Table 3.

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<sup>2</sup> Wilson, B. D. M., Choi, S. K., Harper, G. W., Lightfoot, M., Russell, S., & Meyer, I.H. (2020). Homelessness among LGBT adults in the U.S. Los Angeles, CA: Williams Institute.

**Table 3: Homeless Housing Inventory Chart**

	Total Inventory				Subpopulation Inventory		
	Family		Adults Only		Vets	Unaccom Youth	DV
	# beds	# units	# beds	# units	# beds	# beds	# beds
Emergency Shelter	1345	316	244	n/a	0	6	58
Transitional Housing	65	25	21	21	11	24	70
Permanent Supportive Housing	217	76	429	429	133	26	0
Other Permanent Housing	103	35	112	112	19	2	0
Rapid Rehousing	332	129	161	161	0	58	0

Source: 2022 Continuum of Care Housing Inventory Count (HIC)

Springfield is committed to a Housing First approach, which is an evidence-based practice designed to connect individuals and families experiencing homelessness to permanent housing quickly and without preconditions and barriers to entry, such as sobriety, treatment, or service participation requirements.

The City, the CoC, and service providers have created a network of 429 permanent supportive housing units for individuals with disabilities and 76 PSH units for families that include a disabled adult. These units combine long-term affordability with intensive service support. The CoC has targeted its PSH units to chronically homeless individuals and families. These units are permanent housing, so turnover takes place slowly.

In 2021, HUD established the Emergency Housing Voucher (EHV) program to provide Housing Choice Vouchers to public housing authorities to assist individuals and families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability. The Springfield Housing Authority received 27 EHV, and DHCD made 52 available to Way Finders to assist Hampden County households, including those from Springfield. In addition, DHCD made EHV available to Hampden County families served by the state’s Emergency Assistance program.

In 2022, Massachusetts introduced additional supportive housing assistance in two programs, one funded by the Department of Public Health and the other funded by the Department of Mental Health. Five Hampden County agencies received funding for long-term rental assistance and supportive services for over 150 households, targeted to address the needs of people experiencing homelessness who have either substance use or mental health conditions or both.

The Springfield Housing Authority offers a Foster Youth to Independence (FYI) program, which issues 3-year Housing Choice Vouchers to youth 18-24 aging out of the foster care system. FYI vouchers are available “on demand” to eligible youth, but the process for youth to access the vouchers has been slow.

The CoC and the Commonwealth of Massachusetts provide time-limited rental assistance to support people moving from homelessness to housing. There are programs that make a one-time assistance

payment for security deposit and first and last months' rent. CoC and Emergency Solutions Grant (ESG) programs provide medium-term rapid rehousing rental assistance that provides rental assistance for up to 24 months. The Massachusetts HomeBASE program provides first and last month's rent and security deposit, funds for furniture, a monthly stipend to help pay rent for up to one year, and utilities.

**Unmet Needs** Gaps in the shelter system include a lack of noncongregate shelter units (once the existing hotel program exhausts its funding), and a lack of shelter capacity for families that do not meet the state's Emergency Assistance requirements.

There is not enough subsidized affordable housing to meet the need.

There is a need for site-based PSH that offers services on site. The only existing site-based PSH is at the Friends of the Homeless Worthington Street campus, and, while this is a critical resource, its co-location with a large shelter limits its ability to meet the needs of some very vulnerable people, including some people with serious mental illness and some people in recovery from substance misuse.

Providers noted the need for housing navigation across the system. Stakeholders indicate that the level of support provided to families receiving time-limited HomeBASE assistance is insufficient for some families. Families with more complex needs would benefit from enhanced stabilization support, including housing navigation and increased financial assistance.

Young adults who have experienced homelessness have identified a need for housing options that address their needs. While some young adults want to live on their own, there are others who would like community (living near other young people), and support (such as on-site staff).

### At-Risk of Homelessness

For HOME-ARP, HUD defines those at risk of homelessness as individuals and families who have an income at or below 30% of the area median income (AMI)<sup>3</sup>, do not have sufficient resources or support networks to prevent them from becoming homeless, and show specific indications of housing instability. The indications of housing instability in HUD's definition include moving two or more times during the last 60 days due to economic reasons, living in another's home due to economic hardship, living in overcrowded housing, or exiting a publicly funded institution or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution). HUD's at-risk definition also includes families and youth that qualify as homeless under the standard used by the Department of Education. Generally, this definition incorporates households with children that are "doubled up."

**Size and Composition.** There is no data set that provides an exact number of at risk households (as defined by HUD), but Comprehensive Housing Affordability Strategy (CHAS) data indicates that Springfield has 14,310 extremely low-income renter households with incomes at or below 30% AMI. Among these households, 10,625 households have one or more of four severe housing problems reported in the CHAS data. These severe housing problems are incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 persons per room, and a rent cost burden greater than 50%.

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<sup>3</sup> HUD identifies households with income at or below 30% AMI as "extremely low-income." For Springfield in 2022, this annual income limit is \$19,800 for a single individual and \$28,250 for a family of four.

**Table 4: Housing Needs Inventory and Gaps Analysis**

	Current Inventory	Level of Need
	# of Units	# of Households
Total Rental Units	29,879	
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	9,590	
Rental Units Affordable to HH at 50% AMI	18,100	
Extremely Low Income (ELI) 0%-30% AMI Renter HH w/ 1 or more severe housing problems* (At-Risk of Homelessness)		10,625
Very Low Income (VLI) 30%-50% AMI Renter HH w/ 1 or more severe housing problems* (Other Populations)		4,675
Total of ELI and VLI with 1 or more severe housing problems		15,300

Source: CHAS (2014-2018)

People who are unable to afford housing may double up with family members or friends. Research indicates that 7.26% of people at or below 125% of the federal adjusted poverty rate live in the home of another person due to economic reasons.<sup>4</sup> Applying this measure to Springfield’s 2020 population indicates that Springfield likely has approximately 3,450 city residents who are doubled up with others due to economic circumstances.

One stakeholder noted that there has been a rise in the number of Puerto Rican families coming to Springfield due to lack of medical care on the Island and delayed recovery from Hurricane Maria. These families have high need, but many do not qualify for shelter or housing because they are doubled up with family or friends.

Among the issues that can cause a housing crisis for extremely low-income households is a decrease in household income. This was a common risk associated with shutdowns and illness due to COVID.

Table 5 illustrates that, among Springfield households with severe cost burden, BIPOC are disproportionately impacted.

**Table 5: Households with severe cost burden, by race and ethnicity**

Race/ethnicity	# with severe cost burden	# households	% with severe cost burden
White, non-Hispanic	3580	22,435	15.96%
Black, non-Hispanic	2570	10,440	24.62%
Hispanic	6620	20,880	31.70%
Asian or Pacific Islander, Non-Hispanic	130	983	13.22%
Native American, non-Hispanic	55	90	61.11%
Other, Non-Hispanic	290	1094	26.51%
<b>Total</b>	<b>13,245</b>	<b>55,920</b>	<b>23.69%</b>

Source: CHAS, 2014-2018; Table includes both owners and renters.

<sup>4</sup> Molly K. Richard, Julie Dworkin, Katherine Grace Rule, Suniya Farooqui, Zachary Glendening & Sam Carlson (2022): Quantifying Doubled-Up Homelessness: Presenting a New Measure Using U.S. Census Microdata, Housing Policy Debate, DOI: 10.1080/10511482.2021.1981976 (<https://www.tandfonline.com/doi/full/10.1080/10511482.2021.1981976>)

**Existing Resources.** The Massachusetts Department of Housing and Community Development Chapter 40B Subsidized Housing Inventory (SHI) indicates that, as of December 21, 2020, Springfield has 10,041 low or moderate income housing units, which are public or subsidized units affordable to households at 50% AMI and below. CHAS data indicates that Springfield has 18,100 units affordable to households at or below 50% AMI, which would be a combination of public and subsidized units plus naturally occurring affordable units.

As illustrated in Table 6, almost 14,000 Springfield households receive subsidies that make their rents affordable through public and subsidized housing or through tenant-based rental assistance from the Housing Choice Voucher Program or the Massachusetts Rental Voucher Program (MRVP). While there are variations among programs, generally, tenants with these types of assistance pay 30% of adjusted monthly income for rent—an amount considered affordable.

**Table 6: Springfield Subsidized Housing Assistance**

Housing Provider	Type	Number
Springfield Housing Authority	Federal public housing	1,757
	State public housing	578
	Housing Choice Vouchers	3,396
	MRVP	179
Way Finders	Housing Choice Vouchers	3,143
	MRVP	548
Privately owned	Subsidized units and project-based vouchers	4,320
<b>TOTAL</b>		<b>13,921</b>

Sources: HUD Public Housing Information Center; HUD Multifamily Assistance and Section 8 Database; DHCD State & Federal Public Housing Units per Local Housing Authority, By Program; Information provided by SHA and Way Finders

The difference between the 14,310 extremely low-income households in Springfield and the supply of 13,921 units in the City indicates a gap of 389 deeply subsidized units. But the fact that there are 10,625 extremely low-income households with one or more severe housing problems indicates that the actual gap is far more pronounced. Unfortunately, many subsidies are used by households that are not extremely low-income. Eligibility for these units/vouchers is typically set at 50% AMI, so households with higher incomes are also able to access the assistance. In addition, households already in the units may increase their income, so that they no longer have the same level of need they had when they entered the units.

Extremely low-income households that do not have a housing subsidy are at high risk for housing instability. Low-income households experiencing a housing crisis such as eviction, utility shutoff, or residing in an unsafe situation (doubled up, homeless, at risk of domestic violence) may access the state’s Residential Assistance for Families in Transition (RAFT) program, which provides up to \$10,000 per household within a rolling 12-month period to help preserve current housing or move to new housing. RAFT is available for households with Income at or below 50% of Area Median Income (AMI), or 60% of AMI for households who are at risk of domestic violence. If applying for assistance with rent arrears, tenant must have received an eviction notice.

**Unmet Needs.** The high number of extremely low income Springfield households who cannot afford rent and have ongoing housing instability would benefit from affordable housing, assistance to support their

ability to earn more income,<sup>5</sup> and programs that provide assistance to households experiencing a housing crisis. While each of these types of resources are available in Springfield, they are not sufficient to meet the demand.

At-risk households are at extremely high risk for eviction, and legal assistance can prevent or delay eviction, but the availability of free legal assistance is limited. Community Legal Aid reports that from August 1, 2021 through July 31, 2022, the organization assisted with 473 housing cases for Springfield residents. Despite that large volume, the organization was unable to assist more than half of the applicants seeking help.

### Survivors of Domestic Violence, Sexual Assault, Trafficking

The third HOME-ARP Qualified Population includes any individual or family who is fleeing or is attempting to flee, domestic violence (DV), dating violence, sexual assault, stalking, or human trafficking.

**Size and Composition.** The YWCA of Western Massachusetts provides comprehensive services to victims of domestic violence, dating violence, sexual assault, and human trafficking in Springfield and Hampden County. In 2020, the YWCA received 4,432 calls to its 24-hour domestic violence/sexual assault hotline, including self-initiated calls and referrals from law enforcement, medical providers, and other key community partners.

Regarding domestic violence survivors, the 2022 PIT Count identified 143 homeless adult survivors of intimate partner violence (17% of homeless adults identified in the count), including 114 who reported that their current homelessness was the result of fleeing from domestic violence. According to the National Intimate Partner and Sexual Violence Survey, approximately four out of 10 non-Hispanic Black women, American Indian, or Alaskan Native women, and one in two multi-racial non-Hispanic women have been a victim of physical violence, rape, or stalking by a partner in their lifetime. This rate is 30 to 50% higher than what is experienced by white non-Hispanic, Hispanic, and Asian women.<sup>6</sup> Women between the ages of 18 and 24 are most likely to experience domestic violence, followed by teens between the ages of 11 and 17.

Regarding human trafficking victims, in 2019, the US National Human Trafficking Hotline identified 22,326 adults and children who are victims of human trafficking in the USA.<sup>7</sup> Massachusetts, specifically, identified 208 victims. While this is considered the most reliable estimate, in a study funded by the National Institute of Justice that same year, cases reported to law enforcement are believed to be only a fraction of the actual total number of victims or survivors of human trafficking.<sup>8</sup> The underreporting of cases is driven by disbelief, fear, stigma, lack of education or awareness, systemic vulnerabilities, the marginalization of specific populations, different definitions, and critical methodological challenges.

The YWCA has provided residential and comprehensive case management services to over 100 survivors of sex trafficking since 2017. Further, the YWCA has assisted approximately 30 survivors with solely case

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<sup>5</sup> Stakeholders particularly noted the need for more Hi-Set education classes and for employment training to support household ability to increase income.

<sup>6</sup> Centers for Disease Control and Prevention. [The national intimate partner and sexual violence survey: 2010-2012 state report.](#)

<sup>7</sup> Human Trafficking in Massachusetts. Massachusetts Advisory Committee to the U.S. Commission on Civil Rights: August 2019.

<sup>8</sup> Farrell et al., Capturing Human Trafficking Victimization Through Crime Reporting

management services. In 2020, the National Human Trafficking Hotline recorded 232 substantive contacts and 81 reports of human trafficking in Massachusetts. In 83% of reported cases, the victims were female; 22% (all genders) were minors. 77% of all cases involved trafficking for sex, 6% for labor, 6% for sex and labor combined, and 11% for unspecified purposes.<sup>9</sup>

**Existing Resources.** In Springfield, the primary agency providing emergency response to survivors of intimate partner violence is the YWCA of Western Massachusetts. The YWCA operates a 58-bed domestic violence shelter connected to the Commonwealth of Massachusetts SafeLink, a statewide hotline and coordinated network of crisis shelters. The agency has set aside four emergency shelter beds used exclusively for victims of human trafficking. Since these beds came online in 2019, these beds have been consistently full.

In 2020, the YWCA created a local “warm” line that survivors can use to access safety planning, limited emergency placements in hotel rooms, and access to rapid rehousing assistance to support a move to a new unit. Beginning July 2022, the YWCA has a new CoC grant that funds survivors' transitional housing and rapid rehousing assistance. The YWCA also leads a collaborative Strategic Prevention Framework Team, comprised of regional stakeholders, who assess local data, strategize how to best help vulnerable populations (such as transitional-aged young adults (18-24 years old), Latina, homeless, MH/SUD, and men/LGBTQ+ subgroups), and disseminate information in the region.

**Unmet Needs.** In Springfield, many people seeking DV assistance have very low incomes and therefore need assistance with housing affordability. Survivors may be able to stay in existing housing or move to secure new housing, but they lack the resources to do so, which may lead to homelessness. In some cases, the abuser was the family earner, so the loss of income makes housing unsustainable. In other cases, financial abuse often includes acts, such as sabotaging credit, stealing money, or preventing them from earning money, that prevent a victim from renting a unit or securing a mortgage. Providers point to the need for prevention funds and time-limited rental assistance to support survivors to remain in or access housing as they stabilize.

Further, survivors may need long-term assistance with affordability. Some will not be able to work at employment that makes a sustainable income, while some may need several years to obtain needed education and skills. Due to disabilities or trauma, some survivors need permanent supportive housing. The need for permanent supportive housing is most significant for single adult survivors.

In 2020 and 2021, the YWCA received 20 unmet requests for shelter services for victims of sex trafficking. The YWCA identified the unique difficulty that survivors of human trafficking getting housed and how this makes it harder for these survivors to escape the cycle of exploitation. This population, often coerced, manipulated, or forced into sex trafficking as young as 13 or 14, becomes trapped in a cycle of exploitation through substance addiction and abuse. Because of the extensive trauma histories and multiple compounding vulnerabilities, survivors need significant support to break free of the cycle, recover from trauma, and become independent. There is a significant need for supportive and secure affordable housing to meet the needs of this population.

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<sup>9</sup> National Human Trafficking Hotline. Massachusetts state report: 1/1/2020-12/31/2020. *National Human Trafficking Hotline Data Report*. <https://humantraffickinghotline.org/sites/default/files/Massachusetts%20State%20Report%20For%202020.pdf>

## Other Populations

The fourth category of HOME-ARP qualifying populations are other populations where providing supportive services or assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines the populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

1. **Previously homeless:** The first part of the Other populations category are households who have previously been qualified as "homeless," are currently housed due to temporary or emergency assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness. This category includes households currently receiving time-limited rental assistance such as Rapid Rehousing or Massachusetts HomeBASE assistance.

**Size and Composition.** The February 2022 point-in-time count identified 188 adults receiving medium-term rapid rehousing rental assistance (up to 24 months) funded by CoC and Emergency Solutions Grant (ESG) programs. In addition, the Massachusetts HomeBASE program was providing rental assistance to 129 family households. HomeBASE can fund several expenses in addition to rent, but the rent benefit is limited to one year.

2. **At Greatest Risk of Housing Instability:** The next part of the Other Populations definition is: a) extremely low-income households paying more than 50% of income for rent, or b) low income households (income up to 50% AMI) and shows the signs of housing instability identified in the at-risk definition above.

**Size and Composition.** CHAS data indicates that Springfield has 7,390 extremely low-income households paying more than 50% of income for rent. When these households are in the midst of housing instability, they qualify for HOME-ARP under the At Risk definition cited above. This 'Other' designation allows them to qualify during periods when they are not experiencing a housing crisis.

There are 6,325 renter households in Springfield with incomes between 30 and 50% AMI, and 4,670 of these households have one of the four CHAS housing problems.

**Existing Resources for Other Populations.** The affordable housing resources available to these other populations are those that are described in the section describing the at-risk population. The challenge for these other low-income populations is that they are generally not prioritized for assistance programs, and, in some cases, may not be eligible because they are not currently homeless and/or have household income greater than 30% AMI.

The 'other population' households are generally eligible for what are referred to as mainstream resources—assistance programs that are generally available in the community. These include eviction prevention programs, but due to the short-term nature of these programs, they are unlikely to provide long-term resolution these households need. If the household needs long-term housing support, the available resources are public and subsidized housing, which have lengthy wait lists.

**Unmet Needs of Other Populations.** Stakeholders noted that not all households provided with short-term assistance are able to maintain housing after their assistance expires. These households need

either longer-term assistance (extended or permanent rental assistance) and/or support that is more intensive during the rapid rehousing assistance period to be able to increase household income.

### Priority needs for qualifying populations

The City has identified the following priority needs:

- Affordable housing, especially housing that is affordable to extremely low-income households
- Non congregate shelter for unsheltered homeless people who are unable or willing to stay in congregate shelter
- Supportive services to assist households to achieve and maintain housing stability

### Determination of Level of Need and Gaps in Current Inventory and System

In order to determine needs and gaps in the current system, the City reviewed the number and characteristics of each of the qualified populations, reviewed resources available to meet the needs of each population, and identified unmet needs. Throughout the review, there were resources identified that simply do not exist, and others that exist but in insufficient supply. The City’s analysis identified places where the gaps are largest or most critical.

## HOME-ARP ACTIVITIES

Springfield will use HOME-ARP to fund development of affordable rental housing, acquisition or development of noncongregate shelter, and supportive services. The City will retain 5% of the funds to pay for administration and planning for the grant. Table 7 shows the allocation amounts.

**Table 7: Use of HOME-ARP Funding**

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$500,000		
Acquisition and Development of Non-Congregate Shelter	\$1,000,000		
Tenant Based Rental Assistance	\$0		
Development of Affordable Rental Housing	4,262,797		
Non-Profit Operating	\$0	0%	5%
Non-Profit Capacity Building	\$0	0%	5%
Administration and Planning	\$303,305	5%	15%
<b>Total HOME-ARP Allocation</b>	<b>\$6,066,102</b>		

### Selection of Developers, Service Providers and Subrecipients

The City will use a Request for Proposal RFP process to seek developers, service providers, and subrecipients to carry out the identified HOME-ARP activities.

The City will release RFPs in September 2022 with a minimum of a four-week response period. Separate RFPs will be released for each of the three activities—development of affordable rental housing, acquisition and development of non-congregate shelter, and supportive services. RFPs will be advertised on the state of Massachusetts *CommBuys* procurement site, in the Massachusetts Good and Services Bulletin, in the local newspaper, and on the website of the City of Springfield Office of Housing. The City will also send the RFPs to the email distribution list that was used for providing notice to the

community of the Community Roundtable during the consultation process and the public hearings on the draft plan.

The City recognizes that some potential development projects may not be ready to apply for funds in an initial round. Therefore, the City may use additional funding rounds to distribute all HOME-ARP funds. The City will use the same method of publication for future RFPs as described above.

### City Administration of Activities

The City will administer the HOME-ARP grant directly.

### Addressing Priority Needs – Rationale for Proposed Plan

**Affordable housing** Consultation and data indicates that all qualifying populations have need for affordable housing, and that the greatest gap is for households with incomes at or below 30% AMI.

Springfield has a significant number of cost-burdened households, as well as a portion of the population who are doubled up due to economic circumstances. Given the present shortage of affordable and available homes, many low-income households spend an unsustainable share of their incomes on housing and are just one financial crisis away from housing instability.

The analysis indicates that there is particular need for supportive housing and for accessible affordable housing units.

The City will take advantage of the special nature of the limited allocation of HOME-ARP funds to develop housing for populations that have the most trouble accessing existing affordable housing—in particular, households experiencing homelessness or fleeing domestic violence. The City will use HOME-ARP funds to encourage the development of accessible units.

**Non congregate shelter** Springfield was able to experiment with non-congregate shelter during the COVID pandemic, and found it to be a critically important resource for a limited part of the population—especially homeless people who are unable or unwilling to enter available shelter. The experience made clear that this is a resource that has assisted providers to reach and serve the most vulnerable populations. The City has determined this to be a priority because it is the only resource that the City has identified that can assist certain unsheltered people.

This allocation is designed to support a small number of units to be used as non-congregate shelter units. The City suggests that these may be incorporated into a permanent supportive housing project.

**Supportive Services** Through the consultation, stakeholders pointed to the need for vulnerable populations to have supportive services available to assist them in accessing and maintaining housing. Stakeholders identified many areas in which services were insufficient or nonexistent.

The City is allocating funds to supportive services, which may be used to provide support to households in rapid rehousing or permanent supportive housing, where the funds will be used to address the needs of qualifying populations and existing programs are insufficient to address existing need.

**Other Needs** The City notes that the pandemic showed very high need for eviction prevention and rapid rehousing resources. Funding for these activities has decreased as pandemic funds are exhausted. However, the Commonwealth of Massachusetts has continued to fund the most critical programs (RAFT

and HomeBASE). Because of the state’s current commitment to fund these activities, combined with ongoing advocacy urging the state to continue funding these activities at adequate levels, the City determined that it would have the most impact by directing funds to other activities.

The City has not allocated funds to tenant-based rental assistance due to the difficulty in finding units to rent with that type of assistance.

**Administration and Planning** The City will use 5% of the HOME-ARP allocation to fund administration and planning activities, which will be carried out by city staff. While the HOME-ARP program allows up to 15% of the funds to be used for this purpose, the City expects its actual staff costs to be less than the full 15%.

## HOME-ARP PRODUCTION HOUSING GOALS

The City estimates that the HOME-ARP funds it allocates will produce 27 affordable rental housing units for qualifying populations, which will be designated as HOME-ARP units and made available solely to households that are part of the qualifying populations.

The City expects that HOME-ARP funds will be one source of funding in projects receiving additional types of housing development funds, including Low Income Housing Tax Credits (LIHTC), Housing Trust Fund, Housing Innovation Fund, and other state sources. By leveraging other funding sources, the City expects that the projects receiving the City’s HOME-ARP funds will ultimately create over 100 units. Units funded by sources other than HOME-ARP may have general affordability restrictions imposed by other funding sources, and may not be limited to HOME-ARP qualifying populations.

## PREFERENCES

### Preferences among Qualifying Populations

The City will use preferences to direct HOME-ARP resources to activities that serve those with the highest levels of need. The City will implement the preferences through its RFP for HOME-ARP funds; projects that serve the identified populations will be given preference by the City for award of HOME-ARP funds.

**Affordable Rental Units** The City will provide preference for HOME-ARP affordable housing units to two of the qualifying populations:

1. Homeless individuals and families as defined in 24 CFR 91.5 (1).
2. Any individual or family who is fleeing, or is attempting to flee, domestic violence (DV), dating violence, sexual assault, stalking, or human trafficking. The preference will apply in the RFP process. Projects that commit to serve the designated populations will receive a preference in the City’s selection of projects to fund with HOME-ARP.

**Non Congregate Shelter** The City will provide preference for non-congregate shelter units for unsheltered individuals with one or more disabilities who are unwilling or unable to stay in congregate shelter. The City will only make funds available to providers that commit to give priority to this population in HOME-ARP non-congregate shelter units.

**Supportive Services** The City will not use a preference in its RFP for supportive services.

The City's use of preferences for affordable rental units and for non-congregate shelter units will incentivize development of resources that meet some of the highest need populations, who are those most likely to be and remain homeless without targeted resources. The City believes that the flexibilities allowed in HOME-ARP provide an unusual opportunity to direct development to serve those with the highest needs. Further, because of the way that HOME-ARP funds can support a limited number of units in a larger development, the City believes that this model serves to appropriately integrate the most vulnerable populations into the broader housing market.

## Referral Methods

Springfield may use multiple referral methods for its HOME-ARP projects and activities.

**HOME-ARP Rental Units** For HOME-ARP rental units that give a preference for homeless populations, the City will require the housing provider to use Coordinated Entry plus other referral methods to fill units created by HOME-ARP. The CoC's coordinated entry system prioritizes people with long histories of homelessness and high service needs. The CE system does not include all HOME-ARP qualifying populations, so the City will allow housing providers to use other referral methods that accept all populations.

HOME-ARP rental units that will give preference to survivors of domestic violence or human trafficking must use the CoC's DV Coordinated Entry system plus other referral methods to fill vacancies. The CE system does not include all HOME-ARP qualifying populations, so the City will allow housing providers to use other referral methods that accept all populations.

HOME-ARP funded projects that do not have a preference may use a project waiting list specific to the project.

Each project awarded HOME-ARP funds will be required to have a Tenant Selection Plan that describes how the developer will work with the local CE system, and any other referring service agency as applicable, to identify appropriate qualified households. An agreement between the developer and the CoC/CE will also be required and will describe the referral method(s) in detail for each HOME-ARP project.

**Non Congregate Shelter** For HOME-ARP non-congregate shelter, the City will require the shelter provider to use Coordinated Entry plus other referral methods to fill the non-congregate shelter units.

**Supportive Services** The City will permit each supportive service project to maintain a wait list to access project services.

## Limitations

The City does not intend to limit eligibility for HOME-ARP rental housing or NCS to a particular qualifying population or specific subpopulation.

## Addressing Unmet Needs or Gaps of the Other Qualifying Populations

The City is providing preference to projects that serve two of the Qualifying Populations – Homeless, and Fleeing Domestic Violence. This makes it unlikely that projects that the City funds will also meet the

needs of the other two Qualifying Populations—at Risk of Homelessness and Other Populations with Greatest Risk of Housing Instability.

The most significant unmet need for the other two Qualifying Populations is affordable housing. The City works to address this need through use of its annual allocation of regular HOME funds. Each year the City provides funds to one or more multifamily affordable housing developments, and these are usually large developments that leverage additional state and federal funds. For example, the City invested HOME funds in Brookings School Apartments, a just-completed 42-unit affordable housing development, and Knox Residences, a 96-unit affordable housing development currently under construction. The City expects to continue providing HOME funds for affordable housing development on an annual basis into the future. While the projects that the City invests in generally target rents at the Fair Market Rent (FMR) level, these projects commonly acquire project-based section 8 subsidies for a portion of their units, thereby including some housing that is affordable to those with very low incomes.

There is significant need for supportive services to assist Qualifying Populations to access and maintain housing, and the City does not expect to be able to meet all of the need through the HOME-ARP program. The City will continue to support additional supportive services through ARPA, CDBG, ESG, HOPWA, and other programs, and will partner with and support services organizations to secure additional funding sources for these needs.

## HOME-ARP REFINANCING GUIDELINES

The City does not intend to utilize HOME-ARP funds to refinance existing debt.

## Appendix A: Consultation Themes

The themes raised during consultation with community stakeholders are summarized below.

### Housing market

- Need for affordable housing; existing affordable housing has very long wait lists
- Lack of inventory and rising rents are making it difficult to use housing vouchers
- Very difficult to find units within HUD's Fair Market Rent
- Very few vacancies of any type
- Need for housing available to people who don't make 3x the rent, have poor credit, or have no rental history
- Need for handicap-accessible units
- Need for housing with services on site/permanent supportive housing
- DPH Low Demand Housing program has been succeeding with ability to pay higher rents
- Huge increase in households needing assistance to avoid utility shut-off; very large back bills
- Providers of affordable housing are limited in resources to provide supportive services to tenants recently rehoused after homelessness or unstable in their affordable housing unit
- Issues with poor housing conditions; units not meeting code requirements

### Individuals without children and chronically homeless individuals

- Need for non-congregate shelter option
- Need for medical respite beds
- Some people will not or cannot come into shelter – due to medical needs, mental health, fear of environment, inability for couple to stay together
- Hotel rooms used as non-congregate shelter met these needs during the COVID pandemic and were helpful in assisting some people from the street into housing
- Need for additional/increased street outreach
- Population can benefit from non-congregate shelter (hotel rooms worked well, but program is ending)
- Small but challenging number of adults with untreated serious mental illness
- Need supportive housing with services on site
- Opportunity to leverage funding support from hospitals
- Individuals released from jail or prison need housing and employment options; need assistance in accessing housing while in a halfway house or residential program

### Families

- Cannot use vouchers/HomeBASE because rents are too high
- HomeBASE stabilization is limited in its ability to provide comprehensive supportive services and flexible spending funds to assist families to remain stably housed
- Need for Hi-Set education + employment training to increase household income
- Families are coming from Puerto Rico due to lack of medical care on the Island and delayed recovery from Hurricane Maria; families that come are high need but ineligible for many programs because they are doubled up















