

## HOME-ARP Allocation Plan

**Participating Jurisdiction:** City of Topeka, Kansas

**Date:** 9-7-22

### Consultation

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

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

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

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

Development Strategies (DS) coordinated with the City of Topeka Housing Services Division to attend (virtually) the January 12, 2022 City of Topeka Homeless Task Force meeting to describe the HOME-ARP consultation and allocation plan process and discuss needs and gaps. The Homeless Task Force has more than 150 members and approximately 45 were present for the January 12<sup>th</sup> call. DS then followed up via email with homeless service, housing, and related organizations to conduct one-on-one consultations via videoconference (Zoom or Microsoft Teams). Consultations were held between January 27<sup>th</sup> and April 1, 2022. Most consultations included one or two representatives of the organizations contacted. Attendees are noted in the table below.

The City of Topeka Housing Services Division solicited input via email from Continuum of Care and Citizen Advisory Council partners after receiving the HOME-ARP grant. Several recommendations about priorities for the use of HOME-ARP funds were received and are also reflected in the allocation plan.

***List the organizations consulted:***

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Topeka Housing Authority (Public Agency)	Organization for fair housing	Phone, Trey George, President/CEO Friday, April 1 at 2:30pm	Primarily serves QP II, and QPs I, III, and IV also utilize their housing resources. They serve those with mental and physical disabilities. Identified having quality housing units, particularly one-bedroom units, available as a major need, evidenced by public housing waiting list of 195 names (162 are for one-bedroom units). Services that help those with mental health challenges would help with housing stability, as well as services that help with utility payments and basic housecleaning practices.
Supportive Services for Veteran Families The Salvation Army	Veterans Group Housing	Zoom Conference Benton, Alissa February 10, 2022 11:00 A.M.	Services provided to veterans within all four QPs. They serve those with mental and physical disabilities.  Identified supportive services for behavioral health, affordable rental housing, number of case managers as top priority.
City of Topeka (Public Agency)	Continuum of Care (CoC)	Zoom Conference Carrillo, Stephanie Lopez-Foster, Hilery January 28, 2022 10:00 A.M.	Services provided to all four QP's. They serve those with mental and physical disabilities.  Identified emergency shelters, transitional housing, affordable housing units as top priority, followed by services for education on domestic violence/human trafficking. Provided data included in this plan.
Valeo Behavioral Health Care	Homeless Service Provider	Zoom Conference Douthart, Teresa February 8, 2022 2:00 P.M.	Services provided to all four QP's. Identified emergency shelters, specifically shelter plus care as top priority, followed by affordable housing, not enough landlords who accept vouchers.

Young Women's Christian Association (YWCA)	Domestic Violence Women Shelter	Zoom Conference Marker, Kathleen Spielman, Becca February 17, 2022 3:30 P.M.  Email to City as well.	Services provided to QP III. Identified emergency shelters, transitional housing as top priority, followed by mental health services, legal services for victims of crimes, assistance with long term support services. It was added that when housing is not available to this population, they often have no choice but to return to their abuser. The YWCA has the need to purchase property to house homeless individuals who are victims and survivors of domestic violence and human trafficking.
Citizen Representing YWCA	Domestic Violence Women Shelter	Marker, Allison Email to City  January 2022	Prioritized increase in emergency housing options for victims/survivors of domestic abuse. The need for funds to purchase property to house victims/survivors. An increased number of beds would enhance the capacity for more individuals and families. It would allow those staying longer to have tremendous success in gaining independence.
Citizen, Representing YWCA	Domestic Violence Women Shelter	Williams, Megan Email to City YWCA Board Member  January 2022	Stated that the services the YWCA provides to the community are necessary, and unfortunately, the need is increasing. Responsibility as leaders within the community is to dedicate ourselves to preventing and solving homelessness in Shawnee County; this can be accomplished with the increase in emergency housing, so the funds should be focused on emergency shelters and transitional housing units.
Citizen, Representing YWCA	Domestic Violence Women Shelter	Sester, Kaityln Email to City January 2022	Wants funds to allow YWCA to purchase housing facilities for domestic abuse victims/survivors; every individual has a right to feel safe in their home.
Valley Park Neighborhood Improvement Association,	Organization for Valley Park	McClacherty, Susan Citizen Council Chair January 2022	Wants to see staff create a project plan which enables all providers to submit proposals. The project plan should include several deliverables,

Citizen Advisory Council			such as the Communication Plan. There are some concerns about local organizations having the skill set to manage a large construction project and the means to continue funds for the future. Advocates for funds to support services to empower and rebuild low to moderate-income victims of domestic violence.
Housing and Credit Counseling Inc.	Organization for fair housing	Zoom Conference Panecati, Abigail January 28, 2022 2:30 P.M.	Primarily provides services to QP II and IV, although services are available for other QPs. Identified education resources for supportive services for tenants and landlords, affordable housing, second chance tenant programs as top priority, followed by accommodations for housing and supported services.
Veterans Administration  (Public Agency)	Veterans Group	Zoom Conference Rose, Kathleen February 11, 2022 11:00 A.M.	Services provided to Veterans or families with a Veteran that could fall within all four QPs. Identified the need for staffing for mental health services as top priority, followed by the need for more case managers, variety of shelters to serve families and veterans with animals. They serve those with mental and physical disabilities.
SENT Topeka, Fellowship Hi-Crest	Organization for fair housing	Zoom Conference Sublet, Jonathan January 28, 2022 3:00 P.M.  Email to city on January 2022	Primarily serves QP II. Identified the need for more emergency shelters and affordable housing as top priority, followed by supported resources and services. The need for quality rental units for those within the 80% or below LMI category so that the available housing voucher funds could be used.
Impact Avenues  (Public Agency)	Homeless Service Provider	Zoom Conference Carrillo, Stephanie Lopez-Foster, Hilery January 28, 2022 10:00 A.M.	Services provided to youth subsets of QPs I and II. Helps students get the resources and opportunities they need to get a quality education and not worry about where they will sleep at night

Topeka Rescue Mission	Homeless Service Provider	Zoom Conference Feaker, Barry (Executive Director) March 9, 2022, 11:30 AM	Provides emergency shelter, various homeless services, education, job training, assistance finding housing, food, and other services. Cited affordable housing units with supportive services as major need. They serve those with mental and physical disabilities.
Homeless Task Force	Housing Services	Zoom Conference Board Members January 12, 2022 1:00 P.M.  Approximately 45 attendees.	Community-wide commitment to the goal of ending homeless population Services: emergency services, supportive services, transitional housing units. Serves all four QPs.  Attendees cited the need for affordable housing units, non-congregate shelter beds, and expanding supportive services, such as helping people obtain ID, have better transportation, vitals checks, and to help landlord and tenant relations. Specific populations/subsets of the QPs that need particular focus are youth, veterans, and those with prior convictions.
Cornerstone of Topeka	Housing Services	Palmer, Christopher, Email to City January 2022	Serves QPs I, II, and IV primarily. Provided the following recommendation for funding: <i>Affordable Housing-</i> \$864,160 for gap financing for affordable housing development <i>Tenant Based Rental Assistance-</i> \$200,000 to enhance the Shelter + Care Program <i>Supportive Services-</i> \$200,000 for Valeo or another agency to either to prevent homelessness <i>Non-Congregate Shelter-</i> \$800,000 for Topeka Rescue Mission/Valeo They serve those with mental and physical disabilities.

North Topeka West Neighborhood Improvement Association, Citizen Advisory Council	Organization for Fair Housing	Pederzani, Laura Citizen Advisory Council Member, Email to City  January 2022	Serves QPs II and IV Supports the following priorities in this order for the Amended Con Plan: 1) Non-congregate Shelter for YWCA 2) Tenant-Based Rental Assistance 3) Supportive Services 4) Affordable Rental Housing  Any resources not exhausted should be used for additional supportive services.
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Summarize feedback received and results of upfront consultation with these entities:

- 1) While our conversations were wide-ranging, almost every person or group we spoke with indicated:
  - A need for more non-congregate shelter beds or units
  - A need for more affordable housing units with supportive services and,
  - A need for more case workers to provide the support needed to encourage long-term stability.
- 2) A contributing reason for this is the fact that so many individuals and families are being housed in hotel rooms, and funding for that is very limited.
- 3) Many groups also pointed to the need for to expand housing and services for special populations, particularly those experiencing or fleeing from domestic violence.

### Public Participation

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

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

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

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and

providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Template:

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

- ***Date(s) of public notice: April 4, 2022***
- ***Public comment period: start date – April 5, 2022. end date – April 20, 2022.***
- ***Public hearing: May 10, 2022.***

CITY OF TOPEKA - HOUSING SERVICES  
620 SE MADISON 1ST FL UNIT 8  
TOPEKA KS 66607-1118

## Proof of Publication

STATE OF KANSAS, SHAWNEE COUNTY, SS; Maureen Gillespie, of lawful age, being first duly sworn, deposes and says that she is Legal Notices Clerk for The Topeka Metro News which is a newspaper printed in the State of Kansas, published in and of general paid circulation on a weekly, monthly or yearly basis in Shawnee County, Kansas, is not a trade, religious or fraternal publication, is published at least weekly fifty (50) times a year, has been so published continuously and uninterrupted in said County and State for a period of more than one year prior to the first publication of the notice attached, and has been entered at the post office as Periodicals Class mail matter. That a notice was published in all editions of the regular and entire issue for the following subject matter (also identified by the following case number, if any) for 1 consecutive week(s), as follows:

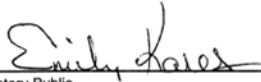
NOTICE - 2021 AMENDED CONSOLIDATED  
ACTION PLAN  
4/4/22



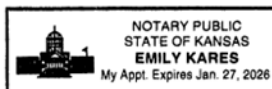
Maureen Gillespie, Legal Notices Billing Clerk

Subscribed and sworn to before me on this date:

April 4, 2022



Notary Public



First published in The Topeka Metro News, Monday, April 4, 2022.

**PUBLIC NOTICE**

The City of Topeka's Department of Planning will make available for public review the City of Topeka's draft **2021 Amended Consolidated Action Plan** Tuesday, April 5, 2022. Written comments may be submitted, through Wednesday, April 20, 2022, to the Department of Housing Services.

The HUD Consolidated Action Plan is an initiative undertaken by the U.S. Department of Housing and Urban Development (HUD) which incorporated into a single submission the planning and application aspects of the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs. The City must have an approved Consolidated Plan in order to receive funds from HOPE VI, Supportive Housing, Shelter Plus Care and other federal funds.

The proposed source of funding for the FY 2021 Amended Consolidated Action Plan funding is as follows:

Proposed Source of Funding	
Community Development Block Grant Program	\$1,903,466
HOME Investment Partnership Program	\$569,672
Emergency Solutions Grant Program	\$160,813
Shelter Plus Care	\$1,644,459
Affordable Housing (CIP-GIF)	\$100,000
Youth and Social Service (CGF)	\$558,288
SOFT (CIP-GIF)	\$1,700,000
HOME-ARP	\$2,064,960
<b>TOTAL</b>	<b>\$6,701,358</b>

Further information may be obtained or written comments may be submitted, by contacting the Department of Planning, 620 SE Madison, 1<sup>st</sup> Floor, Topeka, Kansas 66607, or by calling the office at (785) 368-3711.


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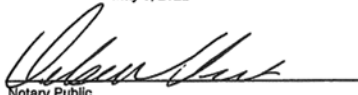
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L96084  
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## Proof of Publication

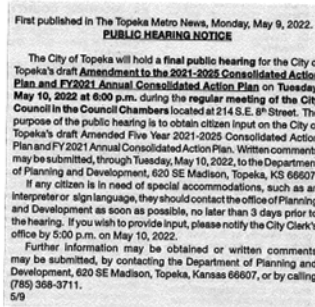
STATE OF KANSAS, SHAWNEE COUNTY, SS; Maureen Gillespie, of lawful age, being first duly sworn, deposes and says that she is Legal Notices Clerk for The Topeka Metro News which is a newspaper printed in the State of Kansas, published in and of general paid circulation on a weekly, monthly or yearly basis in Shawnee County, Kansas, is not a trade, religious or fraternal publication, is published at least weekly fifty (50) times a year, has been so published continuously and uninterrupted in said County and State for a period of more than one year prior to the first publication of the notice attached, and has been entered at the post office as Periodicals Class mail matter. That a notice was published in all editions of the regular and entire issue for the following subject matter (also identified by the following case number, if any) for 1 consecutive week(s), as follows:

HEARING - AMENDMENT TO THE 2021-2025  
CONSOLIDATED ACTION PLAN & FY2021  
ANNUAL CONSOLIDATED ACTION PLAN  
5/9/22

  
Maureen Gillespie, Legal Notices Billing Clerk  
Subscribed and sworn to before me on this date:  
May 9, 2022

  
Notary Public

DEBRA VALENTI  
Notary Public-State of Kansas  
My Appt. Expires Aug. 21, 2023



PO#55228  
L96681  
Publication Fees: \$11.50

### ***Describe the public participation process:***

The consultant, Development Strategies, completed the HOME-ARP Allocation Plan for the City of Topeka and was contracted to meet with all agencies and compile all public comments. Development Strategies presented the results of the Amended 2021 Consolidated Action Plan to the City Council on May 10, 2022 with recommendations for funding for the HOME-ARP Grant.

### ***Describe efforts to broaden public participation:***

The consultant, Development Strategies, was used to broaden public participation and met with all public agencies and organizations listed to obtain public comments.

The city sent notifications via social media, local list serves, and podcasts to increase public participation.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

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



- Several individuals recommend funds to support purchase additional housing for victims of domestic violence.
- Some organizations recommended funds to be used towards additional mental health services.
- Several individuals recommend funds for other emergency shelters and shelter plus care for qualification population.
- Individuals expressed that the funds to be available for different transitional shelters
- Some individuals said funds should be used for additional affordable housing for qualifying populations.
- Several individuals recommend funds to support education programs for tenants and landlords.
- Several individuals expressed that some of the funds to be used towards supportive services.
- One individual recommended the following distribution of funds: \$864,160 for affordable housing, \$200,000 for tenant-based rental assistance, \$200,000 for supportive services, and \$800,000 for non-congregate shelter.

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

All of the comments submitted by the public were accepted, but the following were not addressed in the allocation plan.

- Funds for emergency shelters: the commentor did not specify that the shelters need to be non-congregate, so the recommendation and congregate shelters are not eligible for HOME-ARP funds.
- Tenant-based rental assistance: funding for non-congregate shelter and affordable housing units was indicated as a greater need than adding additional TBRA to what is currently available.
- Supportive services: Funding for supportive services is not included in this plan because the City earmarked \$10 million of ARPA funds for non-profit activities.

## **Needs Assessment and Gaps Analysis**

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

**Template:**

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

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	50		198		20								
Transitional Housing	26		4										
Permanent Supportive Housing	195		123		0								
Other Permanent Housing						0	0	0	0				
Sheltered Homeless						38	158	9	30				
Unsheltered Homeless						4	99	7	101				
Current Gap										40	20	45	30

**Suggested Data Sources:** 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

**OPTIONAL Housing Needs Inventory and Gap Analysis Table**

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	23,155		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,280		
Rental Units Affordable to HH at 50% AMI (Other Populations)	6,750		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		4,400	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,275	
<b>Current Gaps</b>			400-500

**Suggested Data Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

**Describe the size and demographic composition of qualifying populations within the PJ's boundaries:** The City of Topeka, Kansas has approximately 1,900 individuals who met one or more of the definitions of QP I or QP III in 2021. An additional 4,400 households meet the

definition of QP II. These individuals were served by the partner agencies in the city. As indicated on the table on the following page, approximately 58 percent of individuals served were White; 20 percent were Black, African American, or African; five percent were Multi-Racial; four percent were American Indian, Alaska Native, or Indigenous; and the remainder were other racial groups, did not know, data was not collected, or refused to answer.

Approximately 87 percent were Non-Hispanic/Non-Latin(a)(o)(x), 10 percent were Hispanic/Latin(a)(o)(x), and the remainder did not know, refused to answer, or data was not collected. Fifty-three (53) percent were male and 46 percent were female. The most common age group is 18 to 45 (45 percent), followed by 46 to 62 (31 percent), and 0 to 17 (20 percent).

The City's HMIS database indicates that nearly 1,900 unique individuals were served by the partner agencies in the city in 2021. The demographics of those served are summarized in the following table:

<b>SUMMARY OF SERVICES PROVIDED IN 2021: QUALIFYING POPULATIONS, CITY OF TOPEKA</b>		
<b>Categories</b>	<b>Unduplicated Counts</b>	<b>% of total</b>
<b>Race</b>		
American Indian, Alaska Native, or Indigenous	70	4%
Asian or Asian American	3	0%
Black, African American, or African	380	20%
Client doesn't know	8	0%
Client refused	18	1%
Data not collected	11	1%
Multi-Racial	99	5%
Native Hawaiian or Pacific Islander	13	1%
White	1,078	58%
<b>Ethnicity</b>		
Client doesn't know	13	1%
Client refused	20	1%
Data not collected	34	2%
Hispanic/Latin(a)(o)(x)	193	10%
Non-Hispanic/Non-Latin(a)(o)(x)	1,610	87%
<b>Gender</b>		
Data not collected	2	0%
Female	861	46%
Male	990	53%
Multiple-Genders	6	0%
<b>Age Range</b>		
0	1	0%
0-17	374	20%
18-45	839	45%
46-62	568	31%
> 63	77	4%
<b>Total Unduplicated Individuals Served</b>	<b>1,859</b>	

Source: City of Topeka HMIS Database

### ***Homeless as defined in 24 CFR 91.5***

The 2021 Point-in-Time Count indicated that there were 446 sheltered and unsheltered homeless individuals in Topeka on the day that was conducted. HMIS data indicated that Topeka Rescue Mission, the city's primary shelter facility, served 1,095 non-duplicated individuals in 2021. It is

likely that some of the individuals included in the Point-in-Time Count were also served by Topeka Rescue Mission. Thus, the HMIS number is likely more representative of the number of homeless persons in Topeka during 2021. The demographic composition of this population is similar to that noted in the above table with the exception of gender. Approximately 65 percent of those served by Topeka Rescue Mission were male and 35 percent were female.

These counts tend to underrepresent children (those under 18) because they are more likely to be staying with relatives or friends rather than being unsheltered, and there are limited shelter accommodations for children.

***At Risk of Homelessness as defined in 24 CFR 91.5***

According to ACS/CHAS data, there are approximately 4,400 renter households earning at or below 30 percent of AMI with one or more severe housing challenges, which reflects the city's population that is at greatest risk of housing insecurity. In total, 8,215 households in Topeka earn at or below 30 percent of AMI. At the average household size of 2.24, this equates to more than 18,400 individuals living in households earning at or below 30 percent of AMI, 9,860 of which live in households with one or more severe housing challenge.

According to the 2021 to 2025 Consolidated Plan, approximately 1,495 of all households earning at or below 30 percent of AMI contain one or more children 6 years old or younger, 2,490 are small family households, 425 are large family households, and nearly 2,000 contain at least one person 62 years of age or older. Approximately 65 percent of those earning at or below 30 percent of AMI are White; 17 percent are Black, African American, or African; and 13 percent are Hispanic/Latin(a)(o)(x).

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

There is limited data for this qualifying population; however, HMIS data indicates that the YWCA, the primary provider of services to this population, served 248 unduplicated individuals during 2021. Fifty-three (53) percent were White, 34 percent were Black, African American, or African, and the remaining 13 percent were other classifications. Seventy-three (73) percent were Non-Hispanic/Non-Latin(a)(o)(x), 13 percent were Hispanic/Latin(a)(o)(x), and the remaining were other classifications. Most were female (81 percent), and the most common age group was 46 to 62 (40 percent). Those aged 0 to 17 and 18 to 45 accounted for approximately 28 percent of the population, each.

The 2021 to 2025 Consolidated Plan indicates that there are approximately 500 families, of which two-thirds have children, in need of housing assistance that fall within this QP definition. According to the FBI Crime Data Explorer, there were 650 to 900 violent crimes reported in Topeka each year from 2014 to 2020. Of these, 55 to 90 were sexual assault cases, 370 to 430 were aggravated assault cases, and 10 to 26 were homicides each year.

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

Topeka Shelter Plus Care served 395 unduplicated individuals in 2021. Fifty-nine (59) percent were White, 31 percent were Black, African American, or African, and the remaining 10 percent were other classifications. Eighty-nine (89) percent were Non-Hispanic/Non-Latin(a)(o)(x) and 10 percent were Hispanic/Latin(a)(o)(x). Most were female (53 percent), and the most common age group was 18 to 42 (35 percent), followed by 0 to 17 (33 percent), and 46 to 62 (30 percent).

According to the 2021 to 2025 Consolidated Plan, there were 7,375 households earning between 20 percent and 50 percent of AMI. Twenty-nine (29) percent were small families, seven percent were large families, 20 percent were families with one or more children 6 years or younger, and 40 percent had at least one person aged 62 or higher.

Per the 2021 to 2025 Consolidated Plan: the 2018 5-year ACS data indicates a decrease of persons with a disability to 19,038, a 6% decrease. However, the number of those 65 and older with a disability increased to 7,814, a 9% increase.

According to 2018 ACS data, those with a disability in Topeka have median earnings of \$21,217 compared to median earnings of \$31,866 with no disability. Disabled persons have more barriers to workforce participation and are more likely to be low-income, although this depends on the type and severity of disability. Regardless, there is a substantial need for housing assistance for persons with disabilities.

The Consolidated Plan and 2020 Housing Study cite a need for more accessible units for those with physical disabilities.

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

### **Emergency Shelters and Transitional Housing**

There is a robust network of homeless service providers in Topeka who work to meet the needs of those experiencing homelessness or who are at risk of homelessness. The City participates in the local Homeless Task Force group, which meets monthly to expand understanding of the services needed by those experiencing homelessness, facilitate consolidation and coordination of homeless services, and improve service delivery.

The **Topeka Rescue Mission (TRM)** includes a men's shelter, women's shelter, and family shelter and is the primary emergency shelter provider in Topeka. Overall, there are 150 beds for families and single persons. There are an additional 136 upper bunks with a total of 286 beds between the facilities. Occupancy was limited during COVID to allow for social distancing and there are no plans to increase occupancy to pre-COVID levels. At times, due to family demographics or a guest's physical limitations, not all bunks can be utilized. The Topeka Rescue Mission each year shelters approximately 2,000 individuals (including duplicates). The goal of Topeka Rescue Mission is to decrease the likelihood of people who enter their facilities from geographic "hot spots", which are Shawnee, Wabaunsee, Jefferson, Jackson, and Osage counties.

**The YWCA Northeast Kansas** is the primary provider of emergency/transitional housing and supportive services for domestic violence, sexual assault, stalking, and human trafficking victims. The YWCA Northeast Kansas can house 19 women and children at one time, and the YWCA has a second undisclosed location comprised of 9 units in an apartment complex. The latter facility is currently leased and the organization is seeking funding to maintain those units in the current facility, or another building that meets the needs of this population. The YWCA Northeast Kansas reported that from January 2019 to December 2020, the organization provided 652 victims fleeing domestic violence, sexual assault, stalking, and human trafficking with more than 11,178 shelter nights. In addition to housing assistance, victims may require financial assistance for basic needs, legal aid, counseling, and training/education to assist with employment.

**The Cornerstone of Topeka, Inc.** provides short-term transitional housing to individuals and families experiencing homelessness. Cornerstone Inc. currently has 179 housing units consisting of single-family homes, duplexes, and a few fourplexes. There are 23 units providing housing to the homeless population at a low rent with all utilities paid. It is the intention for the household to secure permanent housing by the end of the six months. Application to the program is by referral from a local service agency working with the home and can verify homelessness. The social service agencies are Topeka Rescue Mission, public schools, churches, hospital social workers, Family Resource Center, TARC, Let's Help, DCF, Valeo, and others.

### **Supportive Services and Outreach**

**Valeo Behavioral Health Care** is a Shelter Plus Care participating agency. They provide housing assistance to individuals in Shawnee County who have a severe persistent mental illness and dual diagnosis with substance abuse and lack a regular adequate nighttime residence. Valeo provides transitional housing services for consumers discharged from Osawatomie State Hospital and Nursing Facilities for Mental Health.

**Homeless Task Force** comprises local government entities, social service agencies, medical and mental health providers. This organization is advocacy, information sharing, coordination, and program development devoted to preventing and solving homelessness in Shawnee County, Kansas. One of the most important activities is the annual count of the homeless population and a yearly enumeration of emergency services, supportive services, transitional housing units, and beds that make up the homeless assistance systems.

**The Salvation Army Topeka** is a branch office of the Christian non-profit Salvation Army whose mission is aiding the poor and people in need. The Salvation Army offers human services through programs, including disaster relief, public emergency services, and veteran services. The Salvation Army provides the community with a meal program and community resources for the qualifying population. The Salvation Army offers social services, including food pantry access, rent and utility assistance, prescriptions, eye exams, and clothing vouchers.

**Housing and Credit Counseling, Inc.,** assists the community by helping consumers achieve housing and financial goals. Housing and Credit Counseling Inc assists tenants in resolving related difficulties with dignity. Housing and Credit Counseling Inc services are approved by

HUD and regulated by the Office of the State Bank Commissioner. Housing and Credit Counseling Inc is a local trusted resource for budgeting, credit building and reports, debt management, student loan repayment, mortgage default, and bankruptcy counseling/education. Housing and Credit Counseling Inc provides training and education which covers a range of topics related to homeownership, renting, finances, and credit.

**Veterans Administration of Topeka** has contracted with RoseVilla to provide supportive services to homeless veterans. The goal of the Veterans Affairs of Topeka is to rapidly stabilize Veteran's medical, mental health, substance abuse, and other psycho-social problems to place Veterans in an appropriate transitional or permanent housing. The goal is to place the Veteran into housing within 60 to 90 days, with no more than 180 days without a planned reason for an extension. RoseVilla provides supportive services to Veterans to encourage independent living in a home-like setting. The following core services are provided: housing, meal preparation, cleaning, medication, monitoring, transportation, and activities. RoseVilla owns a refinished three-story house home to 40 residents in downtown Topeka.

**SENT Topeka** is committed to the revitalization and the redevelopment of the communities in Topeka. This mission will be achieved through economic and housing developments. SENT plans to purchase and repair homes in the Hi-Crest Neighborhood, providing resident jobs and helping families with housing through renting or ownership. SENT believes that part of a community transformation is addressing mental health and emotional needs. SENT offers mental health counseling from a licensed professional with training in depression, PTSD, sexual abuse, anxiety, domestic violence, and trauma.

**Topeka Youth Project** is a local organization that works to help young people to stay out of trouble by providing them opportunities around the community. The Topeka Youth Project has provided more than 75,000 hours of community service to Capital City and Shawnee County. The organization consists of two programs for people to choose from: the Jobs For Young Adults and Youth Court.

**United Way of Greater Topeka** brings together people, companies, and nonprofits to create positive change in the community. United Way of Greater Topeka is committed to the education, financial stability, and health of the community. United Way of Greater Topeka invests in Jackson, Jefferson, and Shawnee counties to assist with the basic needs of the most vulnerable populations. The basic needs include food, rent and utilities, protection from Domestic Violence, health care, and assistance with prescriptions.

**Doorstep, Inc.** provides short-term emergency aid to individuals in need and provides resources to promote long-term sufficiency. Doorstep Inc. provides the most vulnerable populations with food, clothing, rent, transportation (local gas vouchers/bus tickets), prescriptions, and utilities. Doorstep's upfront emergency services are for those who need immediate assistance with critical needs while they wait for additional aid.

**Community Action Partnership** offers numerous services, including early childhood education, rental housing, and help with basic needs. Community Action offers Head Start and Early Start for children in the community. Community Action rental housing provides quality, safe, and



affordable housing to families with lower incomes. The rental housing includes single-family homes, duplexes, and apartments. Community Action operates a permanent supportive housing project with partnerships with Valeo Behavioral Health Care. Community Action assists homeless individuals with a rapid re-housing program. This program can help with payment of first-month rent, security deposit, utility deposit(s), and certain utility arrears payments. If homelessness has been caused by COVID-related circumstances, Community Action may be able to help with up to six months of rent.

**Catholic Charities of Topeka** provides emergency assistance to those of low income, poor, immigrants, single moms, and others. Housing assistance involving homeless prevention, rehousing, budgeting, and financial aid is part of the emergency services provided. The Catholic Charities comprises several churches in the Shawnee County area. The clients in the Catholic Charities can get free food, basic needs, clothing, vouchers for gasoline, medications, and other assistance.

**Impact Avenues** helps homeless students in Topeka and Shawnee County. Impact Avenues will help students get the resources and opportunities they need to get a quality education and not worry about where they will sleep at night. Impact Avenues uses a collective impact which is a model that removes barriers in order to accomplish goals, reduces duplication of efforts in the community, and collects data to measure success. When admitted to the program, children and their families will be given support to obtain stable housing, transportation, employment, financial literacy, healthcare, and other services.

***Describe the unmet housing and service needs of qualifying populations, including but not limited to:***

- ***Homeless as defined in 24 CFR 91.5***  
There are currently not enough emergency shelter beds, particularly non-congregate shelter space, for all populations, especially for women and children fleeing domestic violence. There are not enough transitional housing units, supportive housing units, or affordable housing units for homeless individuals and families. There is a need for additional staffing for long-term case management, social work, and similar positions.
- ***At Risk of Homelessness as defined in 24 CFR 91.5***  
Those currently housed but at risk of homelessness lack access to tenant-landlord mediation that could resolve potential eviction situations. There is a lack of good quality affordable housing for individuals and families to move to when there is an unstable housing situation. There are limited resources for deposits, or temporary rental assistance.
- ***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***  
Other families requiring services for housing assistance to prevent homelessness face many similar challenges, including access to counseling or services that help guide through the situation, financial resources to cover back rent or other financial challenges, and similar challenges. There is not adequate affordable housing, particularly landlords who will accept applications from those who are justice involved, had prior evictions, or other challenges.



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

In addition to the needs noted above, those at greatest risk are often highly cost burdened and live in housing that is in poor condition. They often have low-paying jobs, or have difficulty finding/affording transportation to work. Some lack the needed skills, or even clothes, to find work that improves financial security and lessens housing instability. In addition, there is not adequate accessible housing for those with physical disabilities.

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

The following gaps were identified through the consultations and data analysis.

**Shelter Inventory:** As listed in the *Homeless Needs Inventory and Gap Analysis Table*, there are a total of 268 emergency shelter beds in the City of Topeka—50 for families, 198 for adults, and 20 for veterans. However, occupancy for these beds was reduced during the pandemic for health and safety purposes and the primary organization that operates them does not think it will increase occupancy to pre-COVID levels. The agencies represented in the consultations indicated that, overall, there are not enough shelter beds, particularly for women and families, and those who need an unlisted location because they are fleeing domestic violence or a similar dangerous situation.

The most recent Point-in-Time Count (2021) found 446 total homeless individuals—211 unsheltered and 235 sheltered. Of note, nearly half (101) of the unsheltered homeless individuals reported being victims of domestic violence. YWCA is the primary provider of shelter beds and units for this population and they have capacity for approximately 30 individuals at one time, depending on the specific circumstances.

There are gaps in the current shelter inventory. As noted, there are not enough beds or units for victims of domestic violence, and there is a risk that 9 units for victims of domestic violence will be lost due to funding limitations. Based on the consultations with YWCA and other agencies, an additional 20 to 30 shelter beds and/or units are needed.

Due to COVID restrictions (e.g., occupancy reductions to limit exposure in congregate shelters) and other program requirements, almost every agency consulted reported that individuals are being turned away from emergency shelters. The point-in-time count indicated 257 total

homeless adults, with 158 being sheltered, while 198 shelter beds are available. Based on this, 40 beds may have been available for 99 unsheltered individuals. Thus, assuming the point-in-time count is generally representative of the homeless population, there is a need for 50 to 60 additional shelter beds.

Overall, there is a need for 70 to 100 additional shelter beds. Another challenge is that most shelter beds are in congregate facilities. While congregate facilities are not an eligible use of HOME-ARP funds, agencies consulted indicated that there is a need for emergency shelter facilities with private rooms (i.e., non-congregate emergency shelter beds/units). If funded, such units could also be used for transitional housing.

**Housing Inventory:** The most prevalent theme that came out of the consultations is that Topeka does not have enough affordable housing units—transitional housing, supportive housing, or housing for low-income individuals (homeless or otherwise). This was also a key theme of the 2020 *Citywide Housing Market Study and Strategy* (“2020 Housing Study”), which concluded that there will be demand for approximately 2,800 new affordable (at up to 60% AMI) rental units over the next 20 years. Of these, more than 1,000 need to be affordable at or below 30 percent of AMI and approximately 1,000 need to be affordable for those making 30 percent to 50 percent of AMI.

There is also a substantial housing quality challenge that particularly impacts housing access for homeless, sheltered homeless, and households considered to be in unstable housing situations. The *Housing Needs Inventory and Gaps Analysis Table* shows that 4,550 households are at risk of being homeless (30% AMI with at least one severe housing problem) and the 2020 Housing Study identified a supply of only 2,280 rental housing units that are affordable to this income cohort.

Anecdotally, those interviewed for the consultations indicated that it can be difficult to find housing units that are suitable for their clients, particularly if they are/were justice involved or have an eviction on record.

Thus, there is substantial need for additional affordable housing for those at-risk of homelessness (up to 30% AMI) and other populations (30% to 50% AMI)—more than 2,000 rental units over the next 20 years, and approximately 400 to 500 units currently, according to the 2020 Housing Study.

According to the Continuum of Care Housing Inventory Count, there are 30 transitional housing units and 318 permanent supportive housing units in Topeka. Nearly every provider we consulted indicated that the existing supply is not sufficient for the current needs. In particular, transitional housing paired with services for a one-month to six-month stay is needed to help homeless individuals and families prepare for permanent supportive housing, and other housing in the open market. There is a need to at least double the number of transitional housing units—for 30 to 50 additional units. It is important to preserve and add units for specific populations, including victims of domestic violence or trafficking, those with mental health challenges, and veterans, as well as single men and women.

Topeka Housing Authority (THA) operates nine public housing developments with 744 total units, ranging from studios to five-bedroom units. They also administer nearly 1,000 Housing Choice Vouchers, for which the waiting list is closed and has nearly 500 names. The public housing wait list has 195 names, and 162 are waiting for one-bedroom units. THA typically maintains 95 to 100 percent occupancy for public housing units, meaning there are few units available at any given time. According to the 2020 annual report, 58 percent of public housing residents and 55 percent of voucher recipients are single-person households, indicating a strong need for one-bedroom units. Slightly more than 10 percent of residents and voucher holders are seniors 62 and older.

It should also be noted that YWCA housed numerous individuals in hotel rooms during 2021 because of the lack of suitable housing units, and the critical need for shelter during COVID.

**Service Delivery System:** Overall, the City of Topeka has a robust service delivery system for qualifying populations, including services designed to meet the unique needs of veterans, victims of domestic abuse, victims of trafficking, those with mental and physical health challenges, and the general homeless population. Services offered include:

- Case management;
- Mental health counseling;
- Healthcare;
- Credit counseling;
- Rental assistance;
- Education services;
- Transportation vouchers;
- Substance abuse programs;
- Employment training;
- Mobile shower;
- Regular outreach;
- Meals and clothing;
- Legal aid; and,
- Additional services.

According to the service providers consulted, the greatest limitation on providing the services that qualifying populations need is the resources and funding available to provide those services. Thus, the most substantial gap in the service delivery system is adequate staffing to provide the level of case management and support that is needed to address the many challenges that the qualifying populations face.

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

The characteristics of housing associated with instability and increased risk of homelessness include:

- Severe housing cost burden (22 percent of renter households are severely cost burdened);
- Presence of other severe housing problems;
- General poor housing conditions (i.e., peeling paint, older systems, broken windows, etc.);
- Locations in parts of Topeka with below average neighborhood conditions, indirect access to jobs and services, and high poverty rates;
- Higher likelihood of poor property management/landlord practices; and,
- General lack of access to “quality” affordable housing units.

***Identify priority needs for qualifying populations:***

The priority needs were identified through consultations following HUD guidelines, as well as the needs and gaps analysis. The main priorities identified that also qualify under HOME-ARP guidelines are:

- Non-congregate shelter units for victims of domestic violence (QP III)
- Affordable rental housing (all four QPs), including transitional and permanent supportive housing (QP I and QP III).
- Supportive services:
  - Trauma-informed supportive services (all four QPs).
  - Landlord-tenant liaison services to increase the number of landlords accepting rental vouchers (all four QPs).
  - Expanded case management (QP I and QP III).
  - Expanded mental health services (all four QPs).
  - Outpatient services/substance abuse treatment services (all four QPs).
  - Financial assistance to secure stable housing, rental application fees, security and utility deposits, and first/last month’s rent (all four QPs).
  - Transportation—gasoline vouchers, bus passes, etc. (QP I).
  - Education services (all four QPs).

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

The gaps in services and programs need to provide affordable housing, transitional housing, emergency shelters, and supportive services to qualifying populations. The data was collected by the most recent Comprehensive Housing Affordability Strategy (CHAS) data, Continuum of Care Housing Inventory Count (HIC), personal consultation with community providers, 2021 point-in-time count, *2020 Citywide Housing Market Study and Strategy*, and Health Management Information Systems (HMIS). Furthermore, supportive services, case management, and mental health are a priority to achieve housing stability within the qualifying populations.

For households that are currently housed but have many challenges maintaining their home, the level of need was measured by that amount of affordable, safe, and satisfactory living conditions, as well as the number of renter households that are experiencing severe housing cost burdens. The families need assistance to stay housed without becoming burdened by the cost of their home. The consultations helped to confirm the needs and gaps identified through the various data sources, and helped to prioritize the needs.

Overall, the most substantial need that was identified through the consultations and needs and gap analysis is for more housing units for homelessness individuals and families, either in the form of non-congregate shelter beds/units or affordable housing units (transitional and/or permanent supportive housing). These needs were particularly exacerbated by the COVID-19 pandemic, as housing with adequate space for social distancing became very short in supply due to occupancy restrictions.

## **HOME-ARP Activities**

### **Template:**

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

The City of Topeka will follow standard City procurement procedures to issue a Notice of Funds Available (NOFA) stating the amount of HOME-ARP funds available for the acquisition and development of non-congregate shelters and or the development of affordable rental housing units that serve all QPs. The NOFA will be distributed to all known city partners in the housing development and homeless service provider fields, will be published on the City's website, and distributed to the Topeka Capital-Journal and local media outlets for publication and distribution.

Once the city receives the full HOME-ARP grant award from HUD, it will open applications for a specified period of time. Any organization, developer, CHDO or similar entity will be eligible to apply. All applications will be reviewed for overall eligibility, completeness, and how well they meet/address the priorities outlined in this plan. The experience of the applicants and their ability to complete the proposed projects will also be evaluated, as well as their ability to comply with federal funding guidelines and local requirements.

***Describe whether the PJ will administer eligible activities directly:***

The City of Topeka will administer Affordable Housing Services in house and the non-congregate shelter services will be administered through a Subrecipient.

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

The city will not allocate funds to a subrecipient or contractor to administer the HOME-ARP grant.

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

## **Template:**

### **Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 1,000,000		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 754,961		
Non-Profit Operating	\$ 0	0%	5%
Non-Profit Capacity Building	\$ 0	0%	5%
Administration and Planning	\$ 309,699	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 2,064,660</b>		

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

The City will issue a NOFA and RFP for non-congregate shelter and affordable housing projects and specify the provisions of the HOME-ARP program therein. Any applications that do not meet those specific provisions will not be funded. The City will provide a scoring benefit in its RFP process for non-congregate shelter projects that serve the needs of QP III.

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

The consultations and needs and gaps analysis indicated that there are not enough non-congregate shelter units or affordable housing units to serve sheltered and unsheltered homeless individuals and families. While this is true for all homeless population segments, it is particularly urgent for victims of domestic violence/QP III. There is a need for continued provision of wrap-around services to support long-term stability for those who do receive housing and the city will continue to support efforts of partner organization through other programs and funding sources. For instance, Topeka's City Council recently approved to use \$10 million of its ARPA allocation to help fund the activities of social service organizations, including homeless service providers. Thus, there is additional funding available for supportive services and the City encourages any applicant for HOME-ARP funds to also pursue ARPA funds.

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

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

The City estimates that up to 20 non-congregate units and 13 affordable housing units will be added to the current inventory using HOME-ARP funds. The City anticipates that other funding sources will also be used in these projects, including HOME funds, LIHTC awards, and others.

	HOME-ARP Rental Housing Project (#1)	HOME-ARP Rental Housing Project (#2)
<b>Housing characteristics required by the qualifying populations</b>		
Qualifying populations targeted for HOME-ARP rental housing (average household size)	Singles	Small families
Average household size	1	3
Unit size needed (number of bedrooms)	1	2
Amenities		
<b>HOME-ARP Funding</b>		
Total amount of HOME-ARP funding allocated to jurisdiction	\$ 2,064,660.00	\$ 2,064,660.00
Amount of HOME-ARP expected to be used for admin, NFP operating and capacity building	\$ 309,699.00	\$ 309,699.00
<b>Amount of HOME-ARP available for HOME-ARP eligible activities</b>	<b>\$ 1,754,961.00</b>	<b>\$ 1,754,961.00</b>
Amount of HOME-ARP allocated to non-rental housing eligible activities	\$ 1,000,000.00	\$ 1,000,000.00
<b>Amount of HOME-ARP available for rental housing operations and reserves</b>	<b>\$ 354,961.00</b>	<b>\$ 400,000.00</b>
Estimated amount for ongoing operating costs or operating cost assistance reserve	\$ 35,496.10	\$ 40,000.00
<b>Amount of HOME-ARP available for rental housing development</b>	<b>\$ 319,464.90</b>	<b>\$ 360,000.00</b>
Estimated amount from other housing development funding sources		
Total amount available for rental housing development	\$ 319,464.90	\$ 360,000.00
Average per unit development cost for qualifying population	\$ 50,000.00	\$ 50,000.00
<b>Estimated HOME-ARP Housing Production Goal</b>	<b>6</b>	<b>7</b>
<b>Narrative: Use the area below to document the assumptions used in this worksheet. This will assist with the development of the required narrative in the allocation plan.</b>		
Administration reserved at 15% of grant amount. Estimated amount for ongoing operating costs is 10%. The per unit development cost is estimated at \$50,000 because it is anticipated that applicants will leverage other sources, such as LIHTCs (9% or 4%), HOME funds, or other sources to make a project feasible.		

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

According to the *2020 Citywide Housing Market Study and Strategy*, the City has a goal of supporting the production of 125 units per year and those funded by the HOME-ARP dollars will help meet that goal. The continuation and addition of non-congregate shelter units for victims of domestic violence will provide at-risk individuals and families a safe place to go, while they find the services and legal help that they need. The priority for the affordable housing units funded with HOME-ARP funds is permanent supportive housing—many homeless individuals and families cannot find decent units in the market today. Increasing the supply will give them additional choices, and will make it easier for service providers to connect their clients with quality housing units.

## Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A preference permits an eligible applicant that qualifies for a PJ-adopted preference



to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A method of prioritization is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

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

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

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

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

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

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. If a PJ fails to describe preferences or

limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

### **Template:**

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

The City will give preference to non-congregate shelter projects that serve QP III, those experiencing domestic violence and related challenges. No preferences will be established for affordable housing units.

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

Non-congregate housing for victims of domestic violence (QP III) is given preference because of the low supply of existing units/beds for that population, the need for safe environments for that population, the risk of losing 9 units that serve that population, and the fact that partner organizations are placing individuals and families in hotel rooms as shelter because no other options exist.

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

The funds allocated to affordable housing unit production will not have any preference in terms of qualifying populations. Also, should funds allocated to non-congregate shelter go unused after 1 year, those funds will be made available first non-congregate shelter for any qualifying population.

The City will stipulate an affordability period of at least 15 years for affordable housing unit production.

### **Referral Methods**

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

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

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

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

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

**Template:**

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

N/A

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

N/A

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

N/A

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

N/A

### **Limitations in a HOME-ARP rental housing or NCS project**

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation

for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.

- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.

- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

### **Template**

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

The City will not impose any limitations.

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

Not applicable.

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

Not applicable.