

## **HOME-ARP Allocation Plan : Winchester/NSV HOME Consortium**

### **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:***

Staff attended regularly scheduled meetings of the Western Virginia 513 Continuum of Care and the Housing Coalition of the Northern Shenandoah Valley (February 9<sup>th</sup> and March 22<sup>nd</sup>, respectively). Additionally, staff met with Valley Health on February 13<sup>th</sup>, and Shenandoah Alliance for Shelter and Family Promise on March 13<sup>th</sup>.

***List the organizations consulted:***

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Western VA 513 CoC</b>	Continuum of Care, includes 31 member organizations including: veteran’s organizations, domestic violence service providers, homeless service	Attended monthly Meeting	The members of the CoC noted a significant need for affordable rental units that are at or below each community’s fair market rent, additional funding for emergency shelters for the chronically homeless and transitional housing

	providers, affordable housing developers, and Housing Authority.		for populations who are not yet ready to rent on their own.
<b>Valley Health</b>	Not-for-profit health system of hospitals, Urgent Care locations, physician practices, and housing and disability services	One on One Meeting	Valley Health noted a need for a “Medical Respite” specialized shelter providing short-term recuperative care upon hospital discharge, or other medical complications, for adults experiencing homelessness.
<b>Housing Coalition of the Northern Shenandoah Valley</b>	Community Outreach and Affordable & Fair Housing Advocacy Group	Consulted the Steering Committee at their regularly scheduled meeting	This group consistently advocates for a focused effort on building new affordable housing units, and emphasized the necessity in investing in projects to produce new units.
<b>Family Promise</b>	National nonprofit addressing the issue of family/youth homelessness.	One on One Meeting	There is a need for more units (shelter and affordable rentals) that are appropriate for families. Currently, local shelters cater to single men or people fleeing from domestic violence, and create a gap for places suitable for children. Also, a need for affordable rental units larger than one bedroom to accommodate families.
<b>Shenandoah Alliance for Shelter</b>	Homelessness Prevention Organization	One on One meeting	There is a need for affordable rental units in the region, as well as transitional housing and scattered site shelters.

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

Overall, there is a consensus that without investment in new affordable housing development, the region’s housing issues could worsen. With different programs available to assist households with programs like TBRA and downpayment assistance, organizations are struggling to find appropriate units to meet the needs of their clients.

While some feedback included suggestions for highly specialized types of housing to address specific needs of certain populations, in general each agency mentioned the overarching need to build more affordable housing.

**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.

***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: 7/14/2022***
- ***Public comment period: start date - 7/11/2022 end date - 8/10/2022***
- ***Date(s) of public hearing: 8/9/2022***

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

Two separate thirty day public comment periods were held to solicit input on the HOME-ARP allocation plan. The first was held in conjunction with advertisement for the 2022 Annual Action Plan. From 7/11/2022 to 8/10/2022. The second public comment period was held from 2/15/2023 to 3/14/2023 in order to expand opportunities for stakeholder organizations and interested members of the public to contribute their ideas.

Staff attended the February 9<sup>th</sup> Western Virginia 513 Continuum of Care meeting to describe the HOME ARP process, discuss the amount of funding the PJ is eligible to receive, and the range of activities that may be undertaken. Specifically, staff discussed with the CoC members the initial feedback received so far, and solicited for interested organizations to make their needs known.

Additionally, public input was gathered by the City of Winchester, although the public comments were specific to the City’s CDBG program, and not HOME-ARP.

Individual meetings were set up between staff and interested organizations, listed in the chart on page 2 with a summary of comments received.

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

Opportunities for public comment were open for a total of 60 days, longer than the 15 day minimum requirement, split between two public comment periods.

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

No comments received specifically regarding the HOME-ARP plan, but all public comment received at the public hearings are attached to in IDIS. These comments were specifically addressing the City's CDBG priorities.

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

No comments were not accepted.

## **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.

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

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

On any given night, there are approximately 212 homeless households in the Consortium, 191 without children and 21 with at least one child, equating to 267 total homeless individuals. Of Persons in households without children, 12 were ages 18-24, and 182 were over age 24. Of Persons in households with at least one adult and one child, 44 were under age 18, 7 were ages 18-24, and 22 were over age 24.

Of the 267 total homeless individuals, 15 were Hispanic/Latino, and 252 were Non-Hispanic/Latino.

Of the 267 total homeless individuals, 104 were female, 162 were male, and 1 was transgender.

Of the 267 total homeless individuals, 41 were Black or African-American, 198 were White, 3 were Native Hawaiian or Pacific Islander, and 25 were of multiple races.

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

In the boundaries of the HOME Consortium, there are approximately 7560 households at risk of homelessness due to their income falling below 30% of the HAMFI. Of those 7560, there are 945 households whose income falls below 30% of the HAMFI within the City of Winchester, 1930 within the County of Frederick, 1255 within the County of Warren, 845 within the County of Page, 1615 within the County of Shenandoah, and 970 within the County of Clarke.

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

Within the geographic boundaries of the Consortium, there are three domestic violence service organizations who provide a total of 50 beds/units for adults and families, fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice. On any given night, there are 20 victims of domestic violence who are homeless. Pinpointing the size and demographics of this population is challenging due to privacy and anonymity concerns. These organizations typically do not participate in referrals through the Centralized Intake process.

***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***

Other populations reported in the Consortium's footprint who require services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability include 33 severely mentally ill individuals, 31 individuals with chronic substance

abuse issues, 4 veterans, 2 with HIV/AIDS, 12 unaccompanied youth, 4 parenting youth, and 2 children of parenting youth reporting homelessness on any given night.

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

There are 405 year round beds available in the CoC region, including emergency shelter, PSH and RRH beds.

The Winchester NSV HOME Consortium has a robust TBRA system funded with HOME funds, with 4 subrecipient organizations administering the program on behalf of the entire region.

Affordable rental housing continues to be a major challenge in the region. 1,001 people who currently live in Winchester earn 30% or less of the annual AMI of \$83,400, yet there are only 188 rental units that charge monthly rents of \$489 or less.

***Describe the unmet housing and service needs of qualifying populations:***

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

There is a lack of affordable rental housing in the region which impacts the availability of beds in emergency shelters and DV shelters, which puts a strain on the availability of rapid rehousing funding and TBRA. Funding for these types of activities is becoming increasingly difficult to utilize, as there is a distinctly lack of eligible units.

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

Households at risk of homelessness are also impacted largely by the lack of availability of affordable housing in the region, spending >50% of household income on housing costs while having an income of <30% HAMFI, with increasing costs year over year. Housing cost burden is the most commonly cited housing problem followed by housing quality issues – specifically substandard plumbing and kitchen facilities. These housing 23 quality issues are most often associated with the age of the housing stock in the state. Although rental assistance is also a significant need of this population, many would be unable to utilize a voucher in their current housing due to housing quality or overcrowding, and would therefore be forced to find a unit that would meet the voucher program requirements

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

There is a need for shelter and safe transitional housing for this population, Affordable rental units are needed for households to move on from shelter and transitional housing

***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 order to secure stable permanent housing, many of these households require access to financial assistance - whether it be a rental voucher, subsidized rental, or affordable mortgage. Others may require short-term assistance due to an unexpected expense to get back on their feet. Housing stability and behavioral health services may be required to keep individuals facing behavioral health challenges stably housed.

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

After consultation with organizations that provide shelter services, there is likely a need in the Northern Shenandoah Valley regional area for emergency shelter capacity for specific populations, namely individuals who require an acute level of medical care who have a high rate of readmission to the hospital, and for women with children who may not meet the definition of fleeing domestic violence. The region's service delivery system is a coordinated housing intake system, which spans from Winchester to Harrisonburg, and currently is effective as a first step to refer clients to the appropriate resources depending on their geographic location, income eligibility, and current housing situation.

***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:***

Enter narrative response here.

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

There is a need for additional units of affordable rental housing, particularly for households that are between 30% and 60% AMI. This income level is consistent with the ALICE population – Asset Limited, Income Constrained, Employed, meaning they earn above the Federal Poverty Level yet struggle to afford basic expenses, with housing being the first and foremost need to stabilize these households. Targeting this population will help direct funds to support projects that will provide increased opportunities for safe, decent, and affordable housing projects in the Northern Shenandoah Valley.

***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:***

Several sources of data were used to determine the level of need and gaps in the shelter and housing inventory: the 2020, 2021, and 2022 Point in Time survey results, Housing Inventory Charts from 2020, 2021, and 2022, HMIS data, and consultation with service providers. In October of 2021, the City of Winchester completed a Housing Study and the preliminary findings were used in drafting this ARP plan.

## **HOME-ARP Activities**

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

The Consortium will draft a Request for Proposals (RFP) in order to choose projects and developers to receive HOME-ARP awards. The applicants must demonstrate how the funding will be used to create affordable housing. The applicants will be scored according to a rubric which includes points for criteria such as developer experience, capacity building, services offered, housing need, readiness – including meeting land use requirements, and additional funding. Applicants will be awarded funding in order of scoring results until there are no remaining funds available. The applicants will be developers who must describe their own experience as well as that of any service providers, contractors, or consultants with whom they wish to partner. Application exhibits must demonstrate the financial feasibility of the projects, commitments for services and other funding sources, site control, compliance with land use requirements, and detailed construction plans.

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

The PJ will not administer eligible activities directly.

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

N/A

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.



**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ #		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ \$1,965,810.30		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$346,907.70	15 %	15%
<b>Total HOME ARP Allocation</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 Consortium intends to use 85% of its HOME-ARP funds to support the development of affordable rental housing. A request for proposals will be advertised to collect project interest. The need for additional units to be built in the region has reached a critical point, where other supplemental services are suffering due to lack of availability of places to house people affordably.

***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:***

As previously mentioned, the lack of available affordable housing that is also safe and decent, which meets the HUD HQS standards is the main rationale behind investing at least 85% of HOME-ARP funds into the development of rental housing.

**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:***

134

***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:***

The goal of 134 affordable rental units in the Northern Shenandoah Valley addresses the needs that the PJ have deemed a priority by increasing availability for households between 30% and 60% AMI. While any household under 80% AMI may benefit from these activities, specifically the lower end of the eligibility spectrum will be targeted and prioritized. Focusing on producing new

rental units will help address the gaps in the availability of affordable housing identified by the available data that was utilized in drafting this plan.

## 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).

***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 PJ does not intend to give preference to one or more qualifying populations.

***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:***

n/a

## **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).

***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):***

The PJ does not intend to use the CE process established by the Western VA 513 CoC.

***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.

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

The PJ does not intend to limit eligibility for a HOME-ARP rental housing project to a specific qualifying population.

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

N/A

***If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation***

*through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):*

N/A

## **HOME-ARP Refinancing Guidelines**

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

- *Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity*

The PJ does not intend to establish a minimum level of rehabilitation per unit.

- *Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.*

n/a

- *State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.*

n/a

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*

n/a

- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

n/a

- *Other requirements in the PJ's guidelines, if applicable:*

n/a