



Understanding the HOME-ARP Allocation Plan Submission Deadline and Fund Reallocations

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Today's Presenters

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Agenda

- Plan Submission Deadline
- Guidance and Tools
- Training
- Questions and Technical Assistance
- Jurisdictions not Participating in HOME-ARP
- Reallocation of HOME-ARP Funds



HOME-ARP Program Administration

- HUD obligated all grants on September 20, 2021
- Most participating jurisdictions (PJs) have 5% for admin & planning before allocation plan acceptance
 - After acceptance, access to entire grant / can commit to projects
- To date, HUD received 221 allocation plans for review / has accepted 130 of those plans
 - Slow submission is #1 HOME-ARP issue
 - September 2022 letter from CPD's Principal Deputy Assistant Secretary
- There are 20 HOME-ARP projects/activities underway (12 PJs)
- HOME-ARP grants expire September 30, 2030



HUD Notice CPD 22-13

- Issued October 31, 2022
- Revises HOME-ARP Implementation Notice (CPD 21-10)
 - Establishes March 31, 2023, deadline for PJs to submit their HOME-ARP allocation plans
 - Describes the reallocation of funds when a PJ does not submit an allocation plan by the deadline
 - Discusses the required annual action plan amendment for PJs to receive reallocated funds
 - Reviews repayment scenarios when a PJ has expended HOME-ARP funds without an approved allocation plan



Plan Submission Deadline

- CPD Notice 22-13 establishes March 31, 2023, submission deadline for all HOME-ARP allocation plans
 - Amends Section V.C. of HOME-ARP Notice (CPD 21-10) to revise HOME-ARP allocation plan requirements, including establishing the submission deadline
 - Failure to submit a HOME-ARP allocation plan results in the automatic loss of the PJ's HOME-ARP allocation
 - HUD will automatically recapture PJ's HOME-ARP funds without opportunity for hearing



Guidance

- CPD 21-10 HOME-ARP Implementing Notice (pgs. 12-18)
- HOME-ARP Policy Brief: Preferences, Methods of Prioritization, and Limitations
- Common issues with HOME-ARP allocation plans
- HOME-ARP allocation plan FAQs
- HOME-ARP allocation plan fact sheet



Tools

- HOME-ARP Allocation Plan Template (optional)
- HOME-ARP Allocation Plan Field Office Review Checklist
- HOME-ARP Housing Production Goal Calculation Worksheet and FAQ



Training

- Understanding HOME-ARP Preferences, Referral Methods, and Allocation Plan Requirements Webinar
- HOME-ARP Notice Webinar: Notice CPD-21-10, Qualifying Populations, and Allocation Plan Requirements
- HOME-ARP Webinar Series: Planning Process
- HOME-ARP Public Participation Video FAQ
- Submitting Your HOME-ARP Allocation Plan in IDIS eTutorial



Technical Assistance

- Problem solving clinics
 - Virtual clinics organized by PJ cohort beginning in December
 - In-person clinics throughout the country beginning in January, registration forthcoming
- Direct technical assistance (TA) to assist PJs with development of the HOME-ARP allocation plans to include:
 - Training
 - Explaining HOME-ARP requirements
 - Providing guidance
 - Reviewing and commenting on draft allocation plans
- PJs may submit a request for direct TA on the HUD Exchange or through their local HUD field office.
Request should detail PJ's specific needs



Questions

- Participating jurisdictions may send HOME-ARP allocation plan questions to:
 - CPD in local HUD Field Office
 - Ask A Question (AAQ) portal on the HUD Exchange
 - HOMEARP@hud.gov (HUD's Office of Affordable Housing Programs)



Jurisdictions not Participating in HOME-ARP

- PJ does not submit an allocation plan by March 31, 2023
- PJ may decline / return its HOME-ARP allocation before March 31, 2023
 - Notify HUD Field Office in writing
 - Declined allocation included in amount available for reallocation
 - Reallocate according to the requirements of CPD Notice 22-13



Jurisdictions not Participating in HOME-ARP

- Funds expended for admin and planning costs must be repaid if PJ does not submit allocation plan by March 31, 2023, or if PJ's allocation plan never accepted by HUD
 - With non-Federal funds to PJ's HOME-ARP Treasury account:
 - On or before May 30, 2023, if no plan submitted
 - Within 60 days of HUD's final disapproval of PJ's allocation plan, if never accepted
 - HUD will recapture funds without opportunity for a hearing
 - Reallocate according to the requirements of CPD Notice 22-13



Reallocation of HOME-ARP Funds

- Local participating jurisdiction
 - If State submitted HOME-ARP allocation plan, reallocate to State
 - State must give preference to the use of the reallocated funds within the boundaries of the local PJ
 - If State did not submit HOME-ARP allocation plan, reallocate by formula to local PJs within the state that have submitted HOME-ARP allocation plans and agree to accept the funds



Reallocation of HOME-ARP Funds

- State participating jurisdiction
 - State PJ's HOME-ARP allocation reallocated by formula to local PJs within the state that have submitted HOME-ARP allocation plans and agree to accept the funds
- Insular area
 - Insular area's allocation reallocated proportionally to the remaining insular areas participating in the HOME-ARP program that have submitted HOME-ARP allocation plans and agree to accept the funds



Reallocation of HOME-ARP Funds - Process

- HUD will notify PJs if eligible to receive reallocated HOME-ARP funds
- PJs must accept or decline reallocated HOME-ARP funds within 30 days
- HUD will reallocate funds when it determines there are sufficient funds to reallocate
 - Minimize the number of reallocations
 - At least one reallocation during period of availability for obligation



Reallocation of HOME-ARP Funds - Process

- State PJ that receives reallocated funds from a local PJ
 - After HUD reconciles available HOME-ARP funds from local PJs in state that did not submit HOME-ARP allocation plans
 - HUD will notify State of amount of reallocation
 - State must accept or decline reallocated funds
 - If State accepts, HUD amends State's HOME-ARP grant agreement to add reallocated funds and sends to State for execution



Reallocation of HOME-ARP Funds - Process

- If State PJ does not accept reallocated HOME-ARP funds
 - HUD develop proposed formula allocations for all HOME-ARP local PJs in state
 - Notify HOME-ARP local PJs of amount of reallocation
 - HOME-ARP local PJ must accept or decline the reallocated amount
 - HUD reconcile HOME-ARP local PJs that accept reallocations and runs formula again (if necessary)
 - HUD amend local PJs HOME-ARP grant agreement to add reallocated funds / sends to HOME-ARP local PJs for execution



Reallocation of HOME-ARP Funds - Process

- HUD notifies PJ of the amount of reallocated funds it will receive
- PJ notifies HUD to accept / decline reallocated funds
- PJ amends allocation plan to include reallocated funds in accordance with HOME-ARP Notice (CPD 21-10) and citizen participation plan
- PJ submits amended HOME-ARP allocation plan to HUD
- If amount triggers substantial amendment under PJ's citizen participation plan, PJ must follow the substantial amendment process described in section V.C.6. of HOME-ARP Notice (CPD 21-10)
- If amount does not constitute substantial amendment, PJs are encouraged, but not required, to carry out public participation





Questions?