

## HOME-ARP Allocation Plan Template with Guidance

**Instructions:** All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

### 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.

**Tip:** Failure to consult with any of the required organizations in this list constitutes a plan that is substantially incomplete.

**Tip:** For required public agency consultations, “the qualifying populations” (QPs) means all of the qualifying populations. The PJ must consult with at least one public agency that addresses the needs of each QP defined in Section IV.A. of the Notice (pages 3-8).

**Tip:** These consultations are an opportunity to obtain the needs and inventory data required for the plan. For example, domestic violence providers or groups that assist persons fleeing human trafficking will have data on the number of individuals in those QPs and existing resources available to serve their needs.

**Template:**

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

Enter narrative response here.

***List the organizations consulted:***

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.

**Tip:** If using this table, the PJ should identify the required organization type listed in the Notice in Section V.A. in the “type of agency/org” column. When an agency or organization provides multiple services or roles (e.g., a homeless service provider that also provides domestic victim services), note each organization type for that agency or organization under the “type of agency/org” as it will demonstrate compliance with the consultation requirements. When identifying public agencies that address the needs of qualifying populations, list the qualifying population served or specify if the public agency addresses the needs of all QPs. A PJ may add as many rows as necessary to this table to demonstrate that it has met the consultation requirements.

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

Enter narrative response here.

**Tip:** Describe how the feedback received affected the PJ’s approach to allocating HOME-ARP funds among eligible activities. An optional best practice is to also explain how feedback led to any preferences, methods of prioritization, or limitations on eligibility of QPs for a HOME-ARP activity, as well as the use of any referral processes such as coordinated entry for any of the eligible activities.

## 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:*** Click or tap to enter a date.
- ***Public comment period:*** *start date* - Click or tap to enter a date. *end date* - Click or tap to enter a date.
- ***Date(s) of public hearing:*** Click or tap to enter a date.

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

Enter narrative response here.

**Tip:** The PJ must provide the public with information on the “range of activities the PJ may undertake.” This means the PJ must provide the public with information on all the eligible activities that may be funded with HOME-ARP funds (i.e., rental housing, non-congregate shelter, tenant-based rental assistance, and supportive services), regardless of whether the PJ proposes or plans to use HOME-ARP funds for only certain eligible activities. A best practice is to post the draft plan for public comment.

**Tip:** Include a link to or screenshot of the public notice announcing the public comment period, the public hearing date, and where the plan is available. The required HOME-ARP information that must be made public must be available to the public throughout the entire public comment period. HUD strongly recommends that the PJ make its entire draft plan available for public comment. Also note that the public notice must make clear how the public can request reasonable accommodations and meaningful access to the plan in accordance with fair housing and civil rights requirements and the PJ’s citizen participation plan.

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

## 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.

**Tip:** A PJ may use the optional tables provided below and/or attach additional data tables to this template to present current data about the QPs. Suggested data sources include:

- CoC Homeless Populations and Subpopulations Report (Point in Time Counts): <https://www.hudexchange.info/programs/coc/coc-homeless-populations-and-subpopulations-reports/>
- CoC Housing Inventory Counts (HIC): <https://www.hudexchange.info/programs/coc/coc-housing-inventory-count-reports/>
- American community Survey (ACS): <https://www.census.gov/programs-surveys/acs>
- Comprehensive Housing Affordability Strategy (CHAS): [https://www.huduser.gov/portal/datasets/cp.html#2006-2017\\_query](https://www.huduser.gov/portal/datasets/cp.html#2006-2017_query)
- American Housing Survey (AHS): <https://www.census.gov/programs-surveys/ahs.html>
- CPD Maps: <https://egis.hud.gov/cpdmaps/>
- Affirmatively Furthering Fair Housing Planning Tool: <https://egis.hud.gov/affht/>
- Joint Center for Housing Studies: <https://www.jchs.harvard.edu/state-nations-housing-2021>

Please note that data alone does not satisfy the requirements to describe all four of the QPs, a PJ must include narrative for each QP.

**Tip:** Consult with CoC(s) to ensure homeless data reflects the PJ's geographic area. Estimation of homeless and non-homeless counts may be necessary if the geographic area of the PJ and CoC(s) differ.

**Tip:** It may be challenging to identify data for the "Other Populations" qualifying population. However, some data for this QP can be obtained through the consultation process (e.g., the number of people and average wait times on PHA waiting lists or the number of formerly homeless households receiving time-limited housing assistance to help estimate the number the number of households in "Other Populations" category).

**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	#	#	#	#	#								
Transitional Housing	#	#	#	#	#								
Permanent Supportive Housing	#	#	#	#	#								
Other Permanent Housing	#	#	#	#	#								
Sheltered Homeless						#	#	#	#				
Unsheltered Homeless						#	#	#	#				
<b>Current Gap</b>										#	#	#	#

**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	#		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	#		
Rental Units Affordable to HH at 50% AMI (Other Populations)	#		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		#	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		#	
<b>Current Gaps</b>			#

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

**TIP:** Remove optional data tables if the PJ will not provide this data in its plan.

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

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

***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***

Enter narrative response here.

**Tip:** Describe all four QPs within the jurisdiction. Failure to describe any of the four QPs will result in a plan that lacks a required element and therefore, is substantially incomplete. PJs should carefully review the definitions of the QPs in Section IV.A of the Notice (pages 3-8). It is understood that there are no data sources that perfectly reflect certain QPs (e.g., Other Populations). A PJ should describe the relevant data it has and, if necessary, acknowledge the shortcomings of that data in its narrative.

***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):***

Enter narrative response here.

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

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

***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***  
Enter narrative response here.

***Identify any gaps within the current shelter and housing inventory as well as the service delivery system:***  
Enter narrative response here.

***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:***  
Enter narrative response here.

***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:***  
Enter narrative response here.

## 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:***

Enter narrative response here.

**TIP:** Project selection processes (e.g., RFP, NOFA, etc.) that prioritize one or more of the QPs or a subpopulation of a QP over other HOME-ARP QPs (e.g., bonus points for projects that serve the chronically homeless) constitute the PJ's use of a limitation or preference(s) in their HOME-ARP program. If a project selection process described in this section of a PJ's allocation plan implements a preference in the distribution of funds and/or method for soliciting applications and selecting projects, that preference must be described in the plan's Preference section, as described below. If the plan indicates that the PJ is implementing a preference, but the PJ has not identified the preference in the plan, the plan will be deemed substantially incomplete as the contradictory information will prevent HUD from determining the plan has all required elements and is not inconsistent with ARP.

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

Enter narrative response here.

***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:***

Enter narrative response here.

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.

**Tip:** The following table may be used to meet this requirement. If this table is not used, ensure that funding is identified based on HOME-ARP eligible activities in addition to any project names that may be listed.

**Template:**

**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	\$ #		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ #	# %	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:***

Enter narrative response here.

***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:***

Enter narrative response here.

**Tip:** HOME-ARP activities and projects must not violate fair housing and civil rights requirements. Projects that limit eligibility based on a protected class are ineligible (e.g., single-sex rental housing, single adults-only shelter, etc.). A plan that includes narrative about an ineligible project constitutes a plan which is inconsistent with the purposes of ARP, which is grounds for disapproval under Section V.D.2 of the HOME-ARP Notice.

**Tip:** The ARP makes all QPs eligible for the HOME-ARP program. Section IV of the Notice (page 3) states that “ARP requires that funds be used to primarily benefit individuals and families in the following specified “qualifying populations.” Any individual or family who meets the criteria for these populations is eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria. **While limitations are permitted for a HOME-ARP rental or NCS project under certain circumstances, a PJ may not adopt limitations that make any of the four QPs ineligible for assistance under the PJ’s overall HOME-ARP program.** If the PJ will fund only one HOME-ARP project, a PJ is not permitted to impose a limitation on the project. By imposing a limitation in its one HOME-ARP project, the PJ effectively excludes qualifying populations from its HOME-ARP program in violation of the ARP and Notice. This will lead to HUD disapproval of the PJ’s plan as inconsistent with the purposes of ARP. Similarly, if the PJ will only be funding a small number of projects or activities, each QP must be eligible for **at least one project or activity.**

## 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:***

Enter narrative response here.

**Tip:** See spreadsheet and FAQ to assist PJs in determining this goal posted on the HUD Exchange at <https://www.hudexchange.info/resource/6605/homearp-housing-production-goal-calculation-worksheet-and-faq/>.

***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:***

Enter narrative response here.

**Tip:** The HOME-ARP Notice requires this narrative discussion. Failure to include this narrative discussion constitutes a plan that does not have a required element and will be disapproved as substantially incomplete.

## 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.

**Tip:** HOME-ARP activities and projects must not violate fair housing and civil rights requirements. Projects that limit eligibility based on a protected class are ineligible. A plan that includes a narrative about a project or activity that violates fair housing and civil rights requirements is a plan that is inconsistent with the purposes of ARP and will be disapproved as per Section V.D.2 of the HOME-ARP Notice. Submission of such a plan may also call into question the accuracy of the PJ's certification that it will Affirmatively Further Fair Housing.

**Tip:** The ARP requires all four QPs to be eligible for HOME-ARP assistance. Section IV of the Notice (page 3) states that "ARP requires that funds be used to primarily benefit individuals and families in the following specified 'qualifying populations.' Any individual or family who meets the criteria for these populations is eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria." Pursuant to the ARP, a PJ may not design its overall HOME-ARP program to exclude any of the four QPs. If the PJ will fund only one HOME-ARP project, the PJ may not limit access to the project or activity to one or more of the QPs because it would not provide access for all four QPs. Failure to provide any of the four QPs with access to apply for **at least one of the PJ's HOME-ARP projects or activities** will violate the ARP, HOME-ARP Notice, and result in HUD disapproval of the PJ's plan as inconsistent with the purposes of ARP.

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).

**Tip:** While PJs are not required to describe specific projects in the plan, if the plan includes a description of projects or activities that indicate the use of a preference and the PJ does not identify and describe the preferences in its plan, the plan will be disapproved as substantially incomplete because, due to the contradictory information, HUD cannot determine that the PJ has included the required elements in the plan.

**Tip:** Project selection processes (e.g., RFP, NOFA, etc.) that rank projects based on whether the owner will impose a preference for a QP or subpopulation of a QP constitutes the use of a preference. Any preference must be described in the plan. A PJ may not commit HOME-ARP funds to project selected based on a preference not in the plan until the PJ amends its HOME-ARP allocation plan. Adding a preference 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). A plan that contains contradictory information such as a prior project selection process which implemented a preference with a statement that the PJ has no preferences will be deemed substantially incomplete.

**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:***

Enter narrative response here.

***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:***

Enter narrative response here.

## 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).

**Tip:** Because CEs were established for use in the CoC, CEs are not required to include all of the HOME-ARP QPs. For example, CEs include only a portion of HOME-ARP's fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking population or the "Other Populations." Consequently in order for a CE to be used for HOME-ARP projects or activities, the CE must be expanded to include all four of the HOME-ARP QPs or be supplemented by other referral agencies to permit applications from all four QPs, as described in the HOME-ARP Notice. If a PJ's plan discusses the use of CE as a referral method, it should also describe how the limitations of the CE will be addressed (i.e., through expansion, other referral agencies) so that all QPs will have access to referrals to HOME-ARP projects or activities.

**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):***

Enter narrative response here.

**Tip:** Because CEs are used in programs such as the CoC, Emergency Solutions Grant (ESG) Program, and the Emergency Housing Voucher (EHV) program, they may have inherent preferences and methods of prioritization established for those programs. For instance, in the CoC program, Notice CPD-17-01 describes a method of scoring and prioritizing individuals based upon whether they have more severe service needs and levels of vulnerability, and Notice CPD-16-11 describes a process of prioritizing persons experiencing chronic homelessness. If such methods of prioritizing applicants are to be employed in the HOME-ARP Program project or activity through the use of a CE, they **must** be explained in the HOME-ARP allocation plan (see Section IV.C.2 of the Notice (pages 10-11)). If a PJ does not describe a preference or method of prioritization used by the CE in the plan, then the PJ may not use that CE to admit applicants to HOME-ARP assisted projects or activities and must use a written waiting list to provide assistance to eligible applicants in chronological order, insofar as is practicable. In addition, if a PJ does not describe the CE's preferences and/or method of prioritization in the plan, the PJ may only use a CE for intake in order to add the eligible applicant to the HOME-ARP project or activity's written waiting list.

***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):***

Enter narrative response here.

***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):***

Enter narrative response here.

***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):***

Enter narrative response here.

## 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:*

Enter narrative response here.

**Tip: To avoid potential fair housing and civil rights violations, HUD strongly recommends that a PJ not impose a limitation if implementing a preference would accomplish the PJ's goal of serving a specific QP or subpopulation of a QP. If a PJ will establish a limitation, HUD strongly recommends that PJs consult with the Fair Housing and Equal Opportunity Division in their local HUD Field Office to discuss potential fair housing or civil rights implications.**

***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:***

Enter narrative response here.

***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):***

Enter narrative response here.

**Tip:** The ARP makes all four QPs eligible to benefit from HOME-ARP funds. Section IV of the Notice (page 3) states that “ARP requires that funds be used to primarily benefit individuals and families in the following specified ‘qualifying populations.’ Any individual or family who meets the criteria for these populations is eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria.” A PJ’s plan may not exclude any of the four QPs for assistance under the PJ’s overall HOME-ARP program by limiting access to all HOME-ARP projects or activities. For instance, if a PJ will fund only one HOME-ARP project, it is not permitted to limit the project to exclude any of the QPs. By imposing a limitation in its one HOME-ARP project, the PJ effectively excludes QPs from its HOME-ARP program in violation of the ARP and will lead to HUD disapproval of the PJ’s plan as inconsistent with the purposes of ARP. Similarly, if the PJ will only be funding a small number of projects or activities, each QP must be eligible for **at least one project or activity**.

## 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***

Enter narrative response here.

- ***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.***

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

**TIP:** Remove this section if the PJ will not use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds