



# **HOME – American Rescue Program (ARP) Allocation Plan**

## **COMMUNITY DEVELOPMENT**

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## **INTRODUCTION**

Congress passed the American Rescue Plan which included \$5 billion to assist individuals or household's who are homeless, at-risk of homelessness and other vulnerable populations. The City of La Crosse has been awarded funding in the amount of \$1,097,432.

The City of La Crosse currently receives funding from the U.S. Department of Urban Development (HUD) to assist low-to-moderate income families that focus on priority needs for the city including poor quality of available housing, lack of affordable rental housing and a large homeless population. This plan will be submitted to the HUD as an amendment to our PY2021 Annual Action Plan.

### ***Eligible Populations***

The ARPA funding must be used to primarily benefit individuals or families from the following qualified populations:

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act
- At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homelessness Assistance Act
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
- In other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability
- Veterans and families that include a veteran family member that meet one of the preceding criteria

### ***Eligible Activities***

HOME-ARP funds may be used for four (4) eligible activities

- Acquisition and development of non-congregate shelter
- Provisions of supportive services
- Development and Support of affordable housing
- Tenant based rental assistance (TBRA)

## CONSULTATION

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

The PJ reached out to the following agencies.

*List the organizations consulted:*

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Coulecap, Inc	CoC and Permanent Supportive Housing Provider	Meeting – December 12, 2022	<ul style="list-style-type: none"> <li>• Lack of intensive on-site services and permanent and affordable housing</li> <li>• Address up-stream solutions to prevent homelessness</li> <li>• Barrier free entry into housing</li> </ul>
New Horizon	Domestic Violence Service Provider	Meeting – November 29, 2022	<ul style="list-style-type: none"> <li>• Lack of Affordable housing</li> <li>• Lack of communication and coordination for supportive services</li> <li>• Need for more transportation, childcare, outpatient therapy for mental health (people have to wait months).</li> <li>• Not enough space in DV shelter.</li> </ul>
Anthony - VA Services	Veterans Services	Emailed November 15, 2022 and January 11, 2023 - No response received	
Garden Terrace	Veterans Group/Consumers	Emailed January 11, 2023 – No response received	
La Crosse Housing Authority	Public Housing Agency	Meeting – November 30, 2022	<ul style="list-style-type: none"> <li>• Need for more supportive services to support tenants with tenant to tenant disputes, creating community, access to services, transportation and childcare.</li> </ul>

			<ul style="list-style-type: none"> <li>• Supportive services for seniors aging in place as their needs change. Ensure seniors are aware of resources available to them.</li> </ul>
Western Technical College	Public Agency	Email feedback received January 3, 2023	<ul style="list-style-type: none"> <li>• Identified need for more affordable housing and landlords willing to rent to underserved populations.</li> <li>• Identified a need for more case management/support staff once housing is secured.</li> <li>• Identified need to address housing for persons exiting incarcerating with criminal backgrounds.</li> <li>• Identified need for more support for substance abuse.</li> </ul>
La Crosse School District	Public School	Emailed November 15, 2022 and January 3, 2023. Met with them on January 30 <sup>th</sup> , 2023.	<ul style="list-style-type: none"> <li>• Biggest need is to get up stream and address root cause of homelessness. Need prevention funding to support families in current housing.</li> <li>• Need more supportive services of all types, especially mental health and Alcohol and Other Drug Abuse.</li> <li>• Families is an underserved population in our community.</li> </ul>
Human Rights Commission	Committee that addresses fair housing and civil rights	Emailed November 15, 2022 and January 11, 2023. Asked to attend meeting – Committee meeting was canceled	
YWCA	Homeless Service Provider	Emailed November 15, 2022 - No response received	
Catholic Charities	Homeless Service Provider	Emailed November 15, 2022 and January 11, 2023 –	

		No response received	
Gundersen Hospital	Public Agency that addresses needs of qualifying populations	Meeting November 22, 2022	<ul style="list-style-type: none"> <li>• Identified need for 24/7 shelter.</li> <li>• Prevention – should never have a child who is homeless.</li> <li>• Identified single site permanent supportive housing unit.</li> <li>• Identified a need for coordinated supportive services/case management</li> </ul>
Mayo Hospital	Public Agency that addresses needs of qualifying populations	Emailed November 15, 2022 – No response received	
WAFER Food Pantry	Public Agency that addresses needs of qualifying populations	Emailed January 15, 2023 – No response received	
Independent Living Resources	Public Agency that addresses needs of qualifying populations and agency that addresses persons with disabilities	Emailed November 15, 2022. Meeting cancelled on November 18, 2022. Emailed on January 11, 2023 – No response received	
YMCA	Public Agency that addresses needs of qualifying populations	Meeting on November 28, 2022	<ul style="list-style-type: none"> <li>• Identified a need for housing for people with barriers such as a past eviction.</li> <li>• Identified a need for housing for teenagers.</li> <li>• Identified need for a safe place for families in shelter. Families are not safe in shelters or hotels; lots of drug activity.</li> <li>• Need for more mental health services.</li> </ul>

Karuna	Homeless Service Provider and Organization that addresses needs of qualifying populations	Meeting December 7, 2022	<ul style="list-style-type: none"> <li>• Identified need for supportive services for permanent supportive housing.</li> <li>• Identified a need for more affordable housing options/units.</li> <li>• Identified a need for people with super high barriers, access to programs, but currently not enough adequate programming.</li> </ul>
La Crosse County Veterans Office	Veterans Groups	Emailed January 11, 2023 – No response received	
Consumer Advocacy Council	Consumer Advocacy	Meeting on January 12 <sup>th</sup> , 2023	<ul style="list-style-type: none"> <li>• Affordable housing and rehab is needed in the city. There’s a lack of housing options.</li> <li>• Supportive services, specifically around mental health and Alcohol and Other Drug Abuse.</li> <li>• There’s a lack of low-barrier shelters and not enough space in existing shelters.</li> </ul>

## **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: 2/1/2023***
- ***Public comment period: start date – 2/1/2023 end date – 3/6/2023***
- ***Date(s) of public hearing: 2/22/2023***

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

The public notice was published in the La Crosse Tribune on February 1, 2023. The notice directed interested persons to our city website. The website included a copy of our plan and an option to submit comments direct on the site. In addition, comments could be mailed or delivered to City Hall. Copies of the plan were also available for distribution at City Hall or upon request from the public. A public hearing was held on February 22, 2023.

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

Efforts were made to broaden public participation by making the plan available at the public library and posts were made on social media. Special separate emails were sent to the shelter organizations making sure they were aware the plan was available and included an ask for them

to share it with people staying at the shelter. The plan was also shared with property management to distribute or post for veterans residing at Garden Terrace.

***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 GAP 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.

**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	25	5	52 year around beds 34 seasonal beds	52 year around units, 34 seasonal units	0								
Transitional Housing	0	0	0	0	0								
Permanent Supportive Housing	0	0	43	43	0								
Other Permanent Housing	0	0	0	0	0								
Sheltered Homeless						16	53	4	16				
Unsheltered Homeless						1	135	0	11				
<b>Current Gap</b>										5	1	135	135

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

# HOUSING NEEDS INVENTORY AND GAP ANALYSIS

The City of La Crosse has approximately 11,415 rental units and 9,770 owner occupied units.

## Income Distribution Overview

**Table 1**

Household Income	Owner	Renter	Total
<=30%	450	3,495	3,945
>30% -<=50%	970	2,510	3,480
>50% - <=80%	2,195	2,630	4,825
>80% - <=100%	1,325	1,380	2,705
>100%	4,830	1,400	6,230
Total	9,770	11,415	21,185

Source: HUD Comprehensive Housing Affordability Strategy (CHAS)

## Populations within the City of La Crosse Experiencing Severe Housing Problems

**Table 2**

	Owner	Renter	Total
Household has at least 1 of 4 <b>Severe Housing Problems</b>	600	3205	3805

Source: HUD Comprehensive Housing Affordability Strategy (CHAS)

## Income by Housing Problems

**Table 3**

Household Income	1-4 Housing Problems Renters	1-4 Housing Problems Owners
<=30%	2,985	395
>30% - <=50%	1,840	455

>50% - <=80%	465	695
>80% - <=100%	30	105
>100%	50	130

Source: HUD Comprehensive Housing Affordability Strategy (CHAS)

## Housing Cost Burden

**Table 4**

Household Income	Owner	Renter	Total
Cost Burden <=30%	8,020	5,970	13,990
Cost Burden >30% - <=50%	1,195	2,325	3,520
Cost Burden >=50%	529	2,915	3,444

Source: HUD Comprehensive Housing Affordability Strategy (CHAS)

## Income by Cost Burden

**Table 5**

Income by Cost Burden	Cost burden >30%		Cost Burden >50%	
	Owner	Renter	Owner	Renter
<=30%	395	2,965	245	2,370
>30% - <=50%	455	1,830	190	505
>50% - <=80%	695	435	90	40
>80% - <=100%	105	10	0	0
>100%	74	0	4	0

Source: HUD Comprehensive Housing Affordability Strategy (CHAS)

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

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

The Point in Time (PIT) count from the summer of 2022 recorded 243 people that were homeless in the City of La Crosse. There is a significant gap between the population of people experiencing homelessness and the available shelter beds within the city.

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

Over 32% of households within the City of La Crosse have a cost burden greater than 30% of their income (16% greater than 50% of income). The City has a very low vacancy rate for rental properties and households that have limited income have even fewer choices. The City of La

Crosse Housing Authority has units for families, seniors, individuals and people with disability that have strict income restrictions. These units make up the majority of the affordable income units within the city. The Housing Authority often has waiting lists for tenants to access housing. In addition, the Housing Authority also runs the Section 8 voucher program and current has no available vouchers.

The City works in partnership with many organizations locally to prevent homelessness. We believe prevention is key and getting upstream solutions is critical to stabilizing some of our most vulnerable citizens. Much work is currently being done to provide supportive services to tenants, but the need is greater than what we currently have available. The REACH Services and Resource Center has been a critical partner to assist with housing navigation, homeless prevention, mental/AODA support, healthcare and violence prevention. A critical partnership has also been formed between La Crosse County-La Crosse Area Family Collaborative, La Crosse School District and the City to support households in two of the housing authority neighborhoods. This partnership has provided a social worker and community impact coordinator to reduce evictions, unplanned moveouts, calls to the police department and child protective services, and increase school attendance and participation in afterschool programming. While we have seen great success with these programs, there is much more work to be done.

The Wisconsin Rental Assistance Program has been supporting thousands of households with rent assistance through the pandemic. These funds are running out and no new applications will be accepted for assistance after January 31, 2023. Currently Couleecap, Inc is serving 3,634 households in the Crawford, La Crosse, Monroe and Vernon Counties. While it is unclear how many households are being served within the city, La Crosse is the largest city in the 4-county area.

### ***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking***

In the PIT count, 16 people were fleeing domestic violence that were currently being sheltered and additional 11 were unsheltered. This number is likely understated because some individuals do not wish to identify or disclose this information.

### ***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability***

Local data is not available to accurately quantify this population. However, from our consultations we have heard great concerns for insufficient availability of permanent supportive housing. Many of the clients served by the CoC that have accessed housing have not stabilized successfully in these units due to lack of supports. Many clients served have severe and persistent mental health and substance abuse disorders. The City has been following the Housing First model, but to really support these clients to be housed successfully for the long-term demands more permanent supportive housing as well as housing options that currently do not exist in our community.

An additional challenge that our community experiences is housing people with certain criminal records and exiting incarceration. Many housing options have restrictions in place that prevent

access to housing to protect the current residents. This makes it virtually impossible to find decent housing options within the city.

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

There are significant gaps in affordable housing, shelter and service delivery.

**Shelters**

The City of La Crosse has 94 (34 of these beds are only available in the winter months) available shelter beds within the community provided by four partner agencies to assist individuals experiencing homelessness:

- Catholic Charities
- New Horizons
- Salvation Army
- YWCA

In addition, one agency provides 25 beds for adults with children fleeing domestic and/or sexual violence or human trafficking.

June 2022 PIT count identified 243 individuals experiencing homelessness in the City of La Crosse. During this time, the State of Wisconsin was still providing housing/hotel vouchers through the Wisconsin Emergency Rental Assistance Program. Therefore, the need for shelter beds far exceeds the current availability within the City.

**Affordable Housing**

There is a significant gap in both availability and safe affordable housing in the market. According to data provided above in Table 1 - 12,250 households have income at or below 80% of the area median income. In addition, Table 5 further exasperates this concern showing 6,775 households pay over 30% of their income on housing and 3,440 pay over 50% of their income on housing.

The data further shows that almost 18% of our housing inventory has at least one severe housing problem. Severe housing problems consist of overcrowding, lack of kitchen or bathroom facilities, or severely cost burden.

The La Crosse Housing Authority has the majority of affordable units in the market place. There portfolio contains nine hundred seventy-one units of combined Public Housing, Housing Choice Voucher, Mainstream Voucher, Section 8 New Construction and Project-Based VASH Voucher Programs. They often have long waiting lists for households to access these units.

Through the consultations conducted in developing this plan, many expressed that there were no or very few options for individuals exiting homelessness to even consider for housing. In addition, individuals may want to stay close to family, friends, health care and transportation

options, but due to the market this was often not an option. Unfortunately, this often negatively impacts the likelihood that a person will stay housed.

### **Supportive Services**

Through the consultation process, supportive services were identified as a need for individuals experiencing homelessness. In addition, the housing authority identified a need for supportive services to assist individuals in staying housed. A pilot project in two of the housing authority's properties assisting families stay housed has been extremely successful. There was a need identified to expand this to all housing authority properties including those for seniors and individuals with disabilities. As needs change for seniors and individuals with disabilities, they often are unaware of resources or how to access those resources for simple things like a walker to assist them moving around the apartment. Additional supportive services would ensure these resources were known and available to residents.

#### ***Identify Priority Needs for Qualifying Populations:***

The priority needs identified for the qualifying population for the HOME ARP plan include production and preservation of affordable housing and supportive services for those experiencing homelessness as well as working upstream to prevent homelessness.

#### ***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 city used data from the Point in Time Count, Comprehensive Housing Affordability Strategy data, Census data, the city's 2020-2024 Consolidated Plan and outreach and consultation.

## 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 City of La Crosse will utilize a Request for Proposals process for both developers and service providers. All requests will be reviewed by staff and awarded through a committee process within the city. Development projects will follow existing processes of underwriting, contract management and monitoring.

*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*

Not applicable

### Use of HOME-ARP Funding

	Funding Amount	Percent of Grant	Statutory Limit
Supportive Services	\$329,230		
Development of Affordable Housing	\$658,459		
Administration and Planning	\$109,743	10%	15%
Total HOME ARP Allocation	\$1,097,432		

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

Through consultation developing this plan, review of data, and feedback provided through the public comment period, the highest priority for HOME-ARP funding is development of affordable housing. Developing affordable housing is expensive and when tenant rents are restricted to ensure they are affordable, it becomes difficult for developers to cash flow projects. Therefore 60% of the funding is committed to this goal. The second need identified was supportive services. Once households identify housing it is critical that supportive services are available to ensure the proper supports are available to keep people housed. The most cost effective and least burdensome way to prevent homelessness is to get up stream and help ensure

households don't become homeless to begin with. 30% of the funding is directed at this goal. The remaining funding of 10% is allocated to administration. In the event that the PJ does not use all the administration funds, these funds will be utilized for additional supportive services.

***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 low vacancy rates for rental property, especially affordable rental demonstrates the need for additional affordable housing units. The La Crosse Housing Authority usually had significant wait lists as well for their units. Ending homelessness in our community is not obtainable without additional units. The current PIT count identified 243 people experiencing homelessness in our community. The current market does not have availability for these individuals. The community also utilizes the Housing First model which prioritizes individuals experiencing homelessness have access to stable housing first. Therefore, creating additional affordable housing is the highest priority and weighted accordingly in this proposed plan.

Supportive services are also a critical part of ensuring people remain housed. These services may include, but are not limited to: access to food, transportation, job training, mental health and substance abuse treatment options, childcare and case management. It can further support tenant and landlord mitigation, tenant to tenant disputes, and provide resources when a tenant feels they have been discriminated against.

## **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:*

Developers are estimating the cost of developing affordable units in our city at approximately \$240,000 per unit. Based on this project cost, the PJ estimates that 3 units would be developed with HOME-ARP funding.

*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 PJ anticipates additional affordable housing to be constructed in our city utilizing other resources in conjunction with HOME-ARP funds. Developers will access programs such as Tax Increment Financing, Tax Credits, the PJ's Community Development Block Grant funds and other sources. Construction of affordable housing is our most critical need, but supportive services to ensure households remain funded is also critical. The HOME-ARP funds are a vital resource for supportive services because few other resources are available to meet this need.

## 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 has elected to incorporate a preference based on the data and consultation process. The PJ will implement a preference for supportive services for individuals or households exiting homelessness into permanent housing. The second preference will be for supportive services for individuals or households at risk of homelessness.

No preference has been identified for rental housing units and will be on a first come first served bases.

*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:*

The PJ has identified individuals and households experiencing homelessness as a priority in our community. Homelessness will not end without supportive services to identify and address needs quickly to prevent homelessness. According to the CHAS data, over 2300 households with an AMI of 30% or below are spending over 50% of their income on housing, making them severely cost burdened. In addition, through the consultation process service providers identified challenges with finding affordable housing. This is especially true for individuals and households with an AMI of 30% or below.

## REFERAL 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 a referral method.

## 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.

## 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 will not be refinancing existing debt with HOME-ARP funds.