

HOME-ARP ALLOCATION PLAN

Produced By: Florida Housing Coalition



City of
Gainesville

WHAT'S INSIDE:

NEEDS ASSESSMENT
GAPS ANALYSIS
FUNDING PROPOSAL

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Introduction

Background

On March 11, 2021, President Biden signed the American Rescue Plan (ARP) into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses. To address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through the Department of Housing and Urban Development's (HUD) HOME Investment Partnerships Program (HOME) to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These activities include: (1) development and support of affordable housing, (2) tenant-based rental assistance (TBRA), (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units.

ARP authorized HUD to allocate HOME-American Rescue Plan (HOME-ARP) funds to states, units of general local government, insular areas, and consortia of units of general local government that qualified for an allocation of HOME funds in Fiscal Year (FY) 2021, pursuant to section 217 of the Cranston-Gonzalez National Affordable Housing Act of 1990, as amended (42 U.S.C. 12701 et seq.) ("NAHA"). On April 8, 2021, HUD allocated HOME-ARP funds to 651 grantees using the HOME formula established at 24 CFR 92.50 and 92.60.

The City of Gainesville's HOME-ARP allocation is \$1,968,639. These funds must be used to reduce homelessness and increase housing stability for qualifying populations. Qualifying populations include:

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a));
- At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1));
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
- 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; and
- Veterans and families that include a veteran family member that meet one of the preceding criteria.

Consultation

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

The City of Gainesville recognizes that consultation is important to support evidence-based solutions and intentional planning. The city was sure to comply with all regulatory guidelines governing HOME-ARP funds, including Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program* (the Notice). The city consulted a multitude of stakeholders including those required under the Notice, such as:

- The CoC serving the jurisdiction’s geographic area,
- Homeless service providers,
- Domestic violence service providers,
- Veterans’ groups,
- The public housing agency,
- 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.

For all processes involving the administration of funds through the U.S. Department of Housing and Urban Development (HUD), the city follows consultation and public participation criteria outlined in its approved Citizen Participation Plan (CPP). The city’s CPP encourages input from the community and public participation, emphasizing involvement by low and moderate-income persons of the Gainesville community, particularly those living in the targeted areas. The Plan also encourages comments and participation from all city residents, including minorities, non-English speaking persons, and individuals with disabilities. For the purposes of the HOME-ARP Allocation Plan, consultation and public participation focused on receiving input from qualifying populations, as defined above, and related service providers.

All stakeholders required to be consulted were invited to participate virtually via the FHC Connect platform which offers multiple ways to engage and provide input. Through this project specific site, stakeholders were provided the opportunity to complete a priority needs survey, a quick poll regarding gaps in the homeless services delivery system, exchange ideas related to HOME-ARP funding priorities, and ask questions about the city’s HOME-ARP special allocation or its

administration of HUD programs. Although the survey was open to the public, many respondents were providers serving HOME-ARP qualifying populations. Input was solicited through this method from June 30, 2022 through August 31, 2022.

Stakeholders were also consulted directly via phone interviews where discussions involved soliciting input on the housing and service needs of the qualifying populations, identifying gaps in the housing inventory and homeless services delivery system, and revealing resources available for assisting qualifying populations. The consultation process involved the service organization and its clientele. Direct consultations took place during August 2022.

The city makes every effort to hear from neighbors and service providers when determining funding priorities and implemented a hybrid approach to consultation by conducting both on-site and virtual engagement. Consultation was ongoing June – September 2022.

In addition, stakeholders were consulted directly through interviews. Six organizations, representing the key agencies providing services to the city's qualifying populations, were consulted to provide feedback on priority needs of the service population. All providers were given the opportunity to share thoughts on unmet needs and propose solutions for addressing such within the bounds of HOME-ARP regulations. Providers were also asked to share thoughts regarding gaps in the housing inventory and service delivery system.

The Gainesville Housing and Community Development Department finds it equally important to ensure collaboration inter-departmentally. Staff representing several city departments were involved in regular planning meetings. Departments consulted included: 1) Communications Office; 2) Gainesville Fire Rescue; and 3) Sustainable Development, Planning Division. In addition, special councils were consulted included the Citizen's Advisory Committee for Community Development (CACCD), the City Commission General Policy Committee, and the Affordable Housing Advisory Committee (AHAC).

The data received from service providers, city departments, and special committees helped to inform the funding priorities identified in this plan.

List the organizations consulted:

Agency/Org. Consulted	Type of Agency/Org	Method of Consultation	Feedback
Created Gainesville	Sex Trafficking/Exploitation	Direct Interview	Lack of emergency non-congregate shelter and transitional housing beds, as well as case management resources and general affordable housing for those under 50% AMI.
United Way of North Central Florida/North Central Florida Alliance for the Homeless and Hungry	CoC Lead Agency/Collaborative Applicant	Direct Interview	Lack of capacity with homeless service providers, especially for rental assistance programs. Great need to expand permanent supportive housing.
GRACE Marketplace	Homeless Service Provider	FHC Connect Survey	Development of affordable rental housing is most needed, followed by non-profit operating and capacity building funds
Gainesville Housing Authority	Public Housing Authority	Direct Interview	Need for more affordable rental development, housing navigations and case management support

Alachua County Housing Authority	Public Housing Authority	Direct Interview and FHC Connect Survey	Need for more affordable rental development and landlord incentives to accept vouchers/TBRA as well as case management to sustain housing
Peaceful Paths Domestic Abuse Network	Domestic Violence Shelter	FHC Connect Survey	TBRA most needed, as well as development of affordable rental housing, paired with expansion of case management and housing location supportive services
Partnership for Strong Families, Inc.	Child Welfare Service Organization	Direct Interview	Need affordable housing developed for young adults ages 18-23 who have aged out of foster care and receive a housing stipend from the state of FL
Center for Independent Living of North Central Florida	Persons with Disabilities Service Organization	Direct Interview	Need for the development of more affordable housing units that are ADA compliant. Need for expanded support services to help people apply for benefits and locate housing.
ElderCare of Alachua County	Elderly Service Organization	Direct Interview and FHC Connect Survey	Need for non-profit operating to cover utilities of center, affordable housing for aging population not needing ALF or NH care yet. Development

			of affordable senior housing is needed, need for case management and benefits applications assistance
St. Francis House, Inc.	Homeless Services Families with Children	FHC Connect Survey	Top three priorities: Tenant-Based Rental Assistance (TBRA) Development of Affordable Rental Housing Supportive Services
Family Promise of Gainesville Florida, Inc.	Homeless Service Provider and Affordable Housing Developer	FHC Connect Survey	Top three priorities include: Development of Affordable Rental Housing Non-Profit Operating Funding (only 5% of total funding is eligible) Supportive Services
Art Studios of Grace, Grace Presbyterian Church, Gainesville	Community Building Organization	FHC Connect Survey	Top three priorities include: Development of Affordable Rental Housing Acquisition and Development of Non-Congregate Shelter Tenant-Based Rental Assistance (TBRA)
Alachua Habitat for Humanity	Affordable Housing Developer	FHC Connect Survey	Top three priorities include: Non-Profit Operating Funding (only 5% of total funding is eligible) Non-Profit Capacity Building (only 5% of total funding is eligible and only for organizations that serve homeless populations)

			Tenant-Based Rental Assistance (TBRA)
Three Rivers Legal Services, Inc.	Fair Housing Legal Services	FHC Connect Survey	Top three priorities include: Tenant-Based Rental Assistance (TBRA) Non-Profit Operating Funding (only 5% of total funding is eligible) Supportive Services
Girl Scouts of Gateway Council	Community Builder, Education and Children's Services	FHC Connect Survey	Top three priorities include: Supportive Services Development of Affordable Rental Housing Tenant-Based Rental Assistance (TBRA)
Gainesville Alumni Association	Neighborhood Organization, Education and Children's Services	FHC Connect Survey	Top three priorities include: Acquisition and Development of Non-Congregate Shelter Development of Affordable Rental Housing Tenant-Based Rental Assistance (TBRA)

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

Through participation in the *FHC Connect* Priority Needs Survey and direct consultation, providers serving qualifying populations provided following feedback:

- Lack of Permanent Supportive Housing and affordable housing, especially for single adults.
- Lack of provider capacity to offer rapid rehousing type programs which is an opportunity for capacity building and non-profit operations funding.

- Lack of emergency shelter options for those fleeing Human Trafficking in need of a short-term safe place immediately.
- Of 600 people served in a 12-month period through Human Trafficking providers, 75% of them need some sort of financial housing assistance.
- The Continuum of Care will have an increased responsibility with managing new HOME-ARP projects within their HMIS and Coordinated Entry, additional support is needed at the Continuum of Care level to support these functions.
- There should be an effort to coordinate Human Trafficking training to all Continuum of Care providers, this is an opportunity for capacity building among providers.
- Among the Domestic Violence and Human Trafficking providers, Tenant-Based Rental Assistance and Support Services were the most desired and effective interventions to support housing stability.
- Case Management and housing navigation services are needed to support the Domestic Violence and Human Trafficking populations.

Each provider interviewed indicated support for funding activities that will provide increased access to Permanent Supportive Housing, including the development of new affordable rental housing.

Public Participation

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:

In accordance with HUD regulations, the City of Gainesville made the following information available to the public during the development of the HOME-ARP Allocation Plan:

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

Below represents dates information was made available to the public:

- ***Date(s) of public notice:*** The city published two public notices, one to solicit input on its HOME-ARP special allocation and one to notify the public and stakeholders of plan availability for public comment.
 - ***Community Engagement Public Notices:*** The 6th, 13th, 20th, 21st, 27th, and 28th of July 2022.
 - ***Comment Period Public Notice: November 14, 2022***
- ***Public comment period: start date - TBA end date - TBA***
- ***Date(s) of public hearing: TBA***

Describe the public participation process:

The City of Gainesville is diligent about carrying out public participation activities in accordance with its HUD approved Citizen Participation Plan. Throughout the development of the HOME-ARP Allocation Plan, the City of Gainesville complied with all applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for underserved and marginalized populations, including individuals with disabilities and limited English proficient (LEP) residents. To support inclusion and provide meaningful access to participation, all print materials and digital platforms used to solicit input were formatted for accessibility and city staff were available to receive and comply with any requests for accommodation.

The city implemented a robust public participation process intended to solicit meaningful input to inform the use of its HOME-ARP dollars. The city makes every effort to hear from neighbors and service providers when determining funding priorities and implemented a hybrid approach to community participation by conducting both on-site and virtual engagement. To ensure the planning process was inclusive, all print materials and digital platforms used to solicit input were formatted for accessibility and city staff was available to receive and comply with any requests for accommodation.

Additionally, during the months of June-August 2022, city staff presented on HOME-ARP at several meetings to solicit input from stakeholders. On-site engagement events included:

HOME-ARP On-Site Public Participation		
1	AHAC Meeting	July 12, 2022
2	General Policy Committee Meeting	July 14, 2022
3	CACCD Workshop / Public Meeting	July 19, 2022
4	Community Meeting	July 27, 2022
5	Community Meeting	August 3, 2022

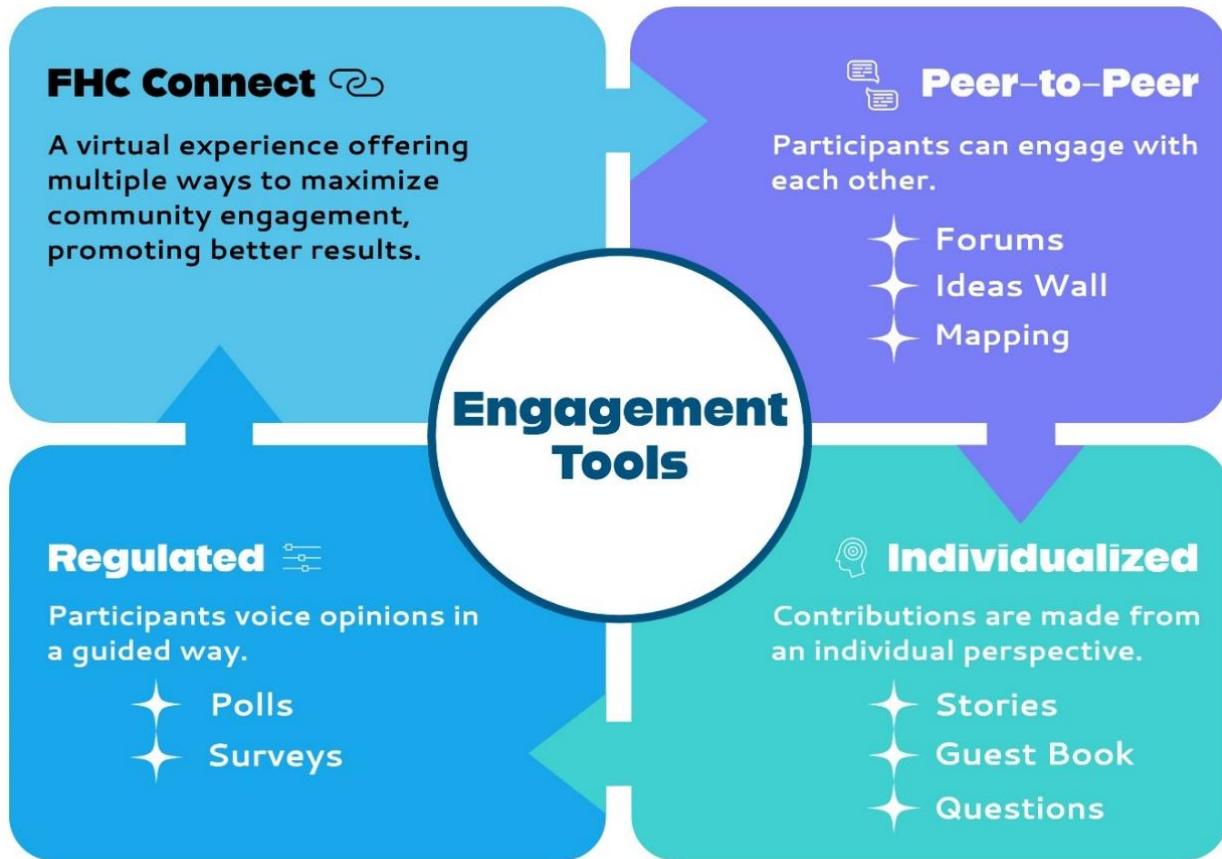
Virtual community engagement methods were also used to gather input from the public and stakeholders on unmet needs of qualifying populations and to discuss effective uses of HOME-ARP funds. The city started by hosting a virtual CACCD workshop/public meeting on June 28, 2022, followed by direct consultations with service providers and the launch of a virtual engagement platform offering multiple tools for gathering input.

Describe efforts to broaden public participation:

Traditional methods of outreach often unintentionally exclude underserved populations, particularly the qualifying populations of focus under the HOME-ARP program. The city recognized this and committed to making changes to its planning process with the intentions of eliminating barriers to participation. While the city complied with federal citizen participation regulations, a key effort made to broaden participation was launching the *FHC Connect* virtual experience in addition to holding meetings at a physical location.

FHC Connect utilizes current technology to meet the increasing demand for a virtual presence. Outreach has changed, particularly since the pandemic, and *FHC Connect* is a progressive outreach method for maximizing citizen participation. This unique virtual experience is an all-in-one community engagement platform offering a set of comprehensive tools and widgets to collect stakeholder input and data. The platform allowed residents and stakeholders to engage in a variety of ways through a webpage dedicated to the city’s HOME-ARP program. In addition, the platform complies with Web Content Accessibility Guidelines (WCAG), offers convenience, and the ability to engage at a comfortable pace. These features often increase participation by marginalized populations.

Available features of *FHC Connect* include:



The city also broadened public participation efforts by facilitating community engagement forums to discuss affordable housing. Forums took place on May 9, 2022; June 1st, 4th, and 25th 2022 and September 24, 2022.

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

The *FHC Connect* virtual platform garnered a large portion of the feedback received through public participation efforts. Overall, *FHC Connect* resulted in 262 visits of which 192 were aware (visited at least one page), 85 were informed (viewed, downloaded, visited, or contributed), and 26 engaged (contributed, participated, or posted).

There were 60 visitors and 22 contributors to the priority needs survey, primarily providers serving qualifying populations. When asked to rank in order of importance housing activities most needed to decrease homelessness, creation of new affordable rental housing ranked in the top two.

Below summarizes additional feedback received from the priority needs survey:

- Lack of funding for increased services.
- Lack of units to provide shelter.
- Lack of awareness about services.
- Non-profit capacity building, acquisition and development of non-congregate shelter, and development of affordable rental housing were ranked among the top needs to effectively decrease homelessness.
- Job readiness, housing counseling, life skills training, and homeless prevention services were ranked among the top supportive services needed to decrease homelessness.
- Scattered sites, hotel/motel rooms, and conversion of existing congregate shelters were ranked as the top ways to develop and provide non-congregate shelter.
- Rehabilitation of existing units, creation of new affordable rental housing, and permanent supportive housing were ranked as the rental housing activities most needed to decrease homelessness.
- For the long-term, creating new affordable housing is critical. Until that exists, we need stopgap funding for agencies provided housing-related crisis services. COVID has had an outsized impacted on staff, reserve funds, capacity, and ability to grow.
- While not as visible, homelessness prevention and improving the quality of the current affordable housing should be priorities.
- There is a need for dedicated counselors who maintain, establish, and cultivate relationships with rental property owners and managers to ensure access to housing, who work to also ensure those entities follow city ordinance and applicable law.
- Where people are able to go to sleep at night affects their ability to handle any other aspects of their lives. HUD and municipalities should prioritize the construction and logistics needed to get everyone to safe, decent housing every night.
- Free busing program, subsidized daycare (including night option) for working mothers, food distribution points away from downtown.
- There should be buy-in from those individuals receiving assistance in the form of required payment plan or volunteer hours.

- Consider community gardens, housing for artists at risk of homelessness.
- Socioeconomic and racial inequality are commonplace in both local neighborhoods and schools. Funds should be used to revitalize East Gainesville affordable living to spur economic development which will create a sense of involvement for the community.

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

All comments and recommendations were accepted during the public participation process and incorporated into the HOME-ARP Allocation Plan as appropriate.

Needs Assessment and Gaps Analysis

Homelessness is a particularly troublesome and complex issue that plagues communities across the nation. Often, persons experiencing homelessness face multiple and overlapping challenges, which presents real challenges to local jurisdictions, social service providers, and Continuums of Care (CoC) working to address homelessness. This reality is no different in the City of Gainesville. Beyond persistent challenges in addressing the varied needs of individuals, the region faces an increasingly expensive housing market. The economic realities of the housing market at the time this plan was written imposes constant pressure on the supply of housing, particularly for those most vulnerable to homelessness and qualifying populations.

A primary approach to addressing homelessness is to take proper inventory of the scale of the issue. This is done through data analysis, outreach, and consultation with stakeholders to assess the individual needs of qualifying populations. By doing so, not only does the city have a better understanding of needs for the homeless, but service and housing providers will also have greater insight into the particular needs of the homeless and other qualifying populations.

In order to accurately represent the needs of Gainesville's qualifying populations, the city conducted a needs assessment and gap analysis utilizing both quantitative and qualitative data. From resources including the Point-in-Time Count, Housing Inventory Count, and HUD Five-Year Consolidated Plan, the city was able to determine the number of sheltered and unsheltered individuals experiencing homeless on a single night and every other year. Also, the Housing Inventory Count provides an inventory of existing provider programs within the Continuum of Care that provide beds and units dedicated to serve people experiencing homelessness. From the Five-Year Consolidated Plan, the city was able to gather data on the current inventory of rental units affordable to households at risk of homelessness (at or below 30% of AMI) and the number of rental units affordable to households at 50% AMI.

Ultimately, the needs assessment and gaps analysis revealed that for the homeless population, there is currently a surplus of beds for family households with at least one child and there is a lack of beds for adult households without children. Additionally, data told us that that out of a total of 29,455 rental units in the city, only 1,545 rental units are affordable to households at risk of homelessness.

The analysis also revealed several gaps in the homeless delivery system that are detailed in this section but include: 1) access to available, affordable units; 2) access to services; 3) education and awareness; 4) sufficient standardized policies; 5) agency coordination; 6) landlord participation; and 7) data accuracy.

See the full needs assessment and gaps analysis detailed below.

Homeless Needs Inventory and Gap Analysis - Table 1

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	152	N/A	148	N/A	26								
Transitional Housing	29	13	0	N/A	74								
Permanent Supportive Housing	0	N/A	104	N/A	904								
Other Permanent Housing	0	N/A	0	N/A	0								
Sheltered Homeless						83	248	81	59				
Unsheltered Homeless						39	546	54	57				
Current Gap										+142	N/A	-294	N/A

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

Housing Needs Inventory and Gap Analysis - Table 2

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	29,455		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,545		
Rental Units Affordable to HH at 50% AMI (Other Populations)	5,460		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		6,665	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,875	
Current Gaps			- 2,535

Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS); 3. City of Gainesville 2018-2022 Consolidated Plan

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

- *Homeless as defined in 24 CFR 91.5*

General Homelessness:

According to the 2022 Point In Time (PIT) Count completed by the Continuum of Care on January 25th, 2022, a total of 925 individuals experienced homelessness on this specific night with 63% (587 individuals) being unsheltered. This is the highest PIT count in the past 5 years. The majority (65%) of the homeless population identifies with being male. Less than 5% identified as Hispanic/Latino in ethnicity, where 52% identified as white and 42% identified as being black in regard to race. Just over 5% identified with multiple races. Twenty-four percent (223 people) of the individuals were experiencing chronic homelessness, meaning they have a disability and have been homeless for at least 12 months over the past three years. One-hundred and seventy individuals, of which 142 were unsheltered also disclosed they are living with a serious mental illness. Upon looking to the CoC System Performance Measure Data submitted to HUD for 2021, 1,198 individuals were served in the 12-month reporting period either through an emergency shelter or transitional housing. First-time homelessness was reported among 1,039 individuals going through the homeless and housing crisis response system in 2021.

Single Adults

Majority of the homeless population within the Gainesville area are single adults without children. As of the 2022 PIT count data, there were 794 individual adults identified as homeless, 31 of them being young adults between the ages of 18-24 while the other 763 were over 24 years of age. The gender makeup included 30% female, 69% male, and less than 1% (4 people) identifying as Gender Non-conforming. A total of 4% identified as Hispanic/Latino. The racial breakdown of this population included 55% white, 39% black, and 5% identifying with multiple races. Chronic homelessness was the highest among single adults, with 209 individuals meeting the criteria for chronicity.

Family Homelessness

Families consisting of at least one adult over the age of 18 and one child under 18 accounted for 33 households on the PIT night. The average family size for those experiencing homelessness among this group is 3.6 individuals. There were 76 children under the age of 18 in these households, 7 people between the ages of 18-24, and 39 people over the age of 24. A total of 61% of individuals in these households were female, while the remaining 39% were male. Ten individuals, 8%, identified as Hispanic/Latino regarding ethnicity. The racial breakdown of these households shows that 61% identify as Black/African American, 31% identify as White, and 7% identified with multiple races. There were 3

households totaling 13 people who met the criteria for being considered chronically homeless.

Youth Homelessness

According to the 2022 PIT data, there were 49 youth under the age of 18 living on their own, 24 of who were living in unsheltered situations. The majority, 78% identified as male. No one in this category identified as Hispanic/Latino and there was an equal representation of those identifying as White and those identifying as Black, with 50% represented for each race. One youth identified as being chronically homeless

Veteran Homelessness

There was a total of 135 homeless veterans with 39 in emergency shelter, 42 in transitional housing, and 54 unsheltered. There were no families with children where the head of household identified as a veteran. Less than 1% of veterans identified as Hispanic/Latino in ethnicity and 64% identified as white, and 33% identified as black in race. Twenty-four veterans were considered chronically homeless.

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

As of the 2021 Emergency Rental Assistance Program Treasury Demographic Report, a total of 3,230 households were assisted in Alachua County. All of these households were and may continue to be at risk of homelessness due to inadequate income and the cost of housing. An average of \$3,003 was spent to prevent homelessness per household by either covering costs related to rental assistance or arrears, and utilities assistance or arrears. With 1,039 individuals reporting their first episode of homelessness in 2021, (HUD CoC System Performance Measures), it is presumed their first experience with homelessness could have been avoided through expanded resources for homelessness prevention. This group of 1,039 individuals experiencing first time homelessness is also a good indicator of the individuals falling into homelessness for which homelessness could have been prevented. The Department of Education data on doubled-up families; meaning the count of families that are forced to live together in inadequately sized housing to accommodate their families due to a lack of financial resources, indicated 635 Alachua County School children counted for doubled-up living situations.

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

The 2022 PIT data revealed that 116 people were survivors of domestic violence, with 57 of those individuals being unsheltered on the night of the PIT count. Also, through consultation with the major victim services providers, Created Gainesville, they served over 600 individuals over the past 12 months through their assistance with sexual

exploitation services, all of which needed some type of housing assistance, whether it be relocation assistance, financial assistance, or legal assistance.

- ***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***

Through direct consultation with Elder Care and Disability service organizations, it was revealed that those with disabilities or those needing to age in place with limited financial and social resources, living independently is not an option. There are not many units that are ADA compliant and affordable for someone on a fixed income reliant on SSI or SSDI alone. At times, people needing in-home healthcare either fall into homelessness, end up with family or friends, or are advanced to an even higher level of care, like an assisted living or nursing home facility due to the lack of independent, affordable and accessible housing and lack of supports to keep people in their homes, aging in place.

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):

Shelter

Upon the most recent homeless housing inventory completed by the CoC in January 2022, a total of 326 emergency shelter beds were available to the community, with 23 of those beds being in non-congregate shelter settings, the other 303 beds were all congregate in setting. According to the 2022 PIT count, 282 of the 326 year-round beds were utilized showing a shelter utilization rate of 87%. The lower utilization rate for emergency shelters can be explained by covid and needing to make accommodations for social distancing in congregate shelter settings to some extent. This community also has an additional 108 seasonal beds and another 1,128 overflow beds designated to compensate for extreme weather and high shelter need times.

Supportive Services

Throughout the direct consultations with local organizations serving those nearing or experiencing homelessness, victim service providers, and PHAs, there was a general consensus that supportive services for housing location and case management to sustain housing are not provided to the extent needed. Specifically mentioned among a few providers were supportive services, specifically, for care navigation and intensive case management services for permanent supportive housing programs. Providers shared that there needed to be more resources dedicated to supportive services for serving all of the qualified populations. Specifically mentioned multiple times was the difficulty in locating affordable housing suitable for the qualifying populations due to conditions imposed on the rental market directly related to the pandemic and there is little to no resources to fund supportive service helping the qualifying populations with navigation of service systems and housing location assistance.

Tenant-Based Rental Assistance

Renters are struggling to find affordable rental units and cost-burdened renters are one unexpected expense away from homelessness. Existing rental assistance programs, such as the Section 8 Housing Choice Voucher Program, public housing, and programs available to homeless persons through the CoC and its partners, are overextended with either long or closed waiting lists. Gainesville Housing Authority (GHA) administers over 1,580 vouchers. The need for rental assistance far exceeds GHA's capacity as there are 15,229 low-income (0-80% AMI) cost-burdened renters (7,124 extremely low-income, 4,255 low income, and 3,850 moderate-income). Cost-burdened renters include 3,140 small related and large related households.

The special needs population includes the elderly, persons with disabilities, persons with substance use disorders, and public housing residents. The growing number of persons with special needs require affordable housing since some of them are unable to work or have lower earning potential. To enable special needs persons to live independently they may also require accessible housing and/or permanent supportive housing. There are 1,024 elderly low-income renter households that are cost-burdened and 4,020 low-income renter households with a disabled member have a housing problem and require housing assistance. The market characteristics for general TBRA described above also substantiate the need for this type of program.

Permanent Supportive Housing

The results of the 2022 HIC showed that there are 1,008 slots for Permanent Supportive Housing. Of those, the majority, 904, are dedicated to being used for veterans only, leaving only 104 slots for the general chronically homeless population who are not veterans. Again, upon the most recent PIT count night, there were at least 223 individuals on that night experiencing chronic homelessness and needing permanent supportive housing. This illustrates, at a minimum, a gap of 120 additional PSH slots. Permanent Supportive Housing "slots" does not guarantee there are appropriate affordable rental units for these participants to choose from in the community. As indicated in the Housing Needs Inventory and Gap Analysis Table above, there are already limited units available for 30% or below AMI-earning households. These PSH slots are competing for these same, limited units. Expanding the number of affordable units for those earning 30% AMI and below would improve efficiency among the existing PSH programs, allowing participants to find appropriate permanent rental housing more quickly and providing options suiting an array of needs associated with ADA compliance.

Affordable Housing

Detailed in the above Housing Needs Inventory and Gap Analysis Table, units for those earning 30% AMI and below are the greatest need and have the fewest availability with only 1,545 units currently dedicated to this group and an additional need of 5,120 units dedicated to this income range. According to the same table, the number of units dedicated to those households earning between 30-50% AMI should be sufficient when compared to need, it is really the ELI population needing additional affordable housing units.

Describe the unmet housing and service needs of qualifying populations:

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

The primary unmet needs among those meeting the homeless definition established in 24 CFR 91.5 include: 1) lack of access to affordable, decent housing for people below 30% AMI; 2) lack of resources supporting long term rental subsidies for those below 30% AMI; and 3) lack of resources supporting case management assisting with navigating and sustaining permanent housing options, including support staff and assessment staff for the Coordinated Entry System.

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

The primary unmet needs among those at risk of homelessness include: 1) lack of resources for financial assistance covering rental and utility arrears; 2) landlord-tenant mediation and legal services; and 3) vouchers and TBRA programs providing long-term rental subsidies.

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

The primary unmet needs for those fleeing DV and sexual exploitation situations include: 1) financial assistance to help with relocation, rent and utility payments and Deposits; 2) resources for case management services; and 3) resources for emergency shelter beds either through single-site or scattered-site hotels.

▪ ***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***

There are two populations that were identified through engagement sessions and consultations as being at high-risk of homelessness, seniors, and those with disabilities. Both sub populations typically have limited, fixed incomes not high enough to accommodate their needs associated with living independently and aging in place. The primary unmet needs for these 2 populations include: 1) funding for rehab of existing housing to make it more accessible; 2) funding for case management; and 3) support staff providing some in-home support and health care services.

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

Homelessness is a multi-faceted and challenging issue at the individual-, family-, and community-level. In its current incarnation, the housing inventory and service delivery system in the City of Gainesville for persons experiencing homelessness and qualifying populations is primarily centered on emergency shelter and short-term assistance.

Beyond emergency shelter, the institutional service delivery system includes rent and utility assistance to persons experiencing homelessness, as well as a broad range of supportive services available to address alcohol and substance abuse disorders, child-care needs, education and workforce training needs, healthcare at a free or reduced cost, and mental health counseling. There are also food banks operating in the service delivery system that provide free meals to persons experiencing homelessness.

Although the delivery system in the city features significant investment and service options, the Continuum of Care outlined a set of goals in the 2020 Action Plan to address gaps in the shelter and housing inventory and service delivery system. Goals are intended to address the following gaps:

Access to available, affordable units:

The demand for housing far outweighs the supply of available housing units, in particular permanently affordable units. Wait list for public housing units, Housing Choice Vouchers, and permanent supportive housing are lengthy, exacerbating homelessness and continuing to put vulnerable populations at-risk. With dignity village coming to a close, the need for additional units will be even greater to re-house individuals.

Access to services:

For qualifying populations access to transportation to and from services is a major barrier. There are not enough resources to expand mobile clinic operations and not enough organizational and staff capacity to operate such clinics if mobile services were to increase. Without transportation many homeless or at-risk individuals are unable to be provided shelter or benefit from supportive services.

In addition, lack of funding has prevented the expansion of services through organizational capacity building. There is a need for additional providers citywide to address the demand for services. Under the current delivery system, any loss of providers could also result in loss of beds and/o loss of additional funding sources.

Education and awareness:

Findings from past community-based planning efforts revealed that many individuals are unaware of housing or service programs available to assist them. It has been indicated that more outreach and education is necessary not only for qualifying populations to understand what options are available but also to enhance public awareness of homelessness.

Sufficient standardized policies:

Though the CoC operates and complies with local, state, and federal funding requirements members identified the need to develop and implement CoC-wide standards to enhance service delivery and ensure care is provided through coordinated systems.

Agency coordination:

Non-profit organizations serving qualifying populations operate on limited budgets and are not guaranteed permanent funding, therefore it is necessary to ensure funds are directed appropriately to effectively decrease homelessness. Coordination amongst funders will identify common priority needs leading to more impactful solutions being funded.

Landlord participation:

Lack of landlord participation is increasingly becoming a significant barrier to affordable housing, particularly for qualifying populations. Creating a better relationship with landlords and helping to reassure them of the benefits of participation is critical to maintaining affordable housing. Providing incentives will assist in overcoming contributing factors related to the loss of landlord participation.

Data accuracy:

Often, the needs of vulnerable populations remain unmet due to inaccurate, outdated, and unavailable data. To address homelessness, the extent of it must be measured and accurately represented. Creating a coordinated system for data collection from service providers would help to better identify and raise awareness about the priority needs of qualifying populations.

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:

Through direct consultation and feedback provided through community engagement surveys, two populations were mentioned consistently as being at higher risk of homelessness and housing instability including seniors 55 and older who have limited fixed incomes and individuals with disabilities with limited natural support networks and low fixed incomes. Data and input suggest that in some cases these individuals would fall into the “at risk of homelessness category”, but not consistently, so being able to assist them before things are dire would be beneficial. For these reasons, these two sub populations will be included in the qualifying population, “other populations”.

Identify priority needs for qualifying populations:

Priority needs, in order of importance for all qualifying populations combined are: 1) the need for the development of accessible and affordable rental housing for persons with extremely low income, specifically bedroom units for adult couples and single adults; 2) financial assistance to help attain and sustain affordable rental housing; and 3) support services funding for housing location and system navigation as well as case management.

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:

To accurately determine the level of need and the gaps in the shelter and housing inventory and service delivery systems a comprehensive analysis was necessary to include a review of data presented in the plan as well as consideration of information presented through other relevant resources. Level of need and gaps were determined through:

Needs Assessment and Gaps Analysis

The city utilized the Homeless Needs Inventory and Gap Analysis table and the Housing Needs Inventory and Gap Analysis table to better understand and determine what the homeless profile looks like in Gainesville, including the number of sheltered and unsheltered homeless and whether there was a need for beds. Findings identified a surplus of family beds and a lack of beds for single adults. Data also revealed a large availability of beds targeted for veterans, specifically permanent supportive housing beds. The non-homeless housing inventory table helped the city determine a gap in affordable rental housing, primarily for the extremely-low- income category, which are most at-risk for homelessness.

In addition, the plan describes the size and demographics composition of qualifying populations in the City of Gainesville, which is imperative to know when determining priority needs as this information helps inform projects, funding amounts, and whether preferences are necessary.

Priority Needs Survey

Surveying stakeholders is a primary tool used to determine level of need and gaps. From survey results, the city was able to analyze specific data points including which eligible activities are thought to effectively decrease homelessness and benefit qualifying populations. The survey also ranked priority needs, which in turn were incorporated into the plan and analyzed to determine strategies for the use of HOME-ARP funds.

Direct Consultation

Consultation with stakeholders, specifically providers serving qualifying populations, enabled the city to analyze data from a different perspective. Through this lens, priority needs that would otherwise be overlooked, were brought to the attention of the city impacting how the level of need and gaps were identified. Consultations resulted in several needs being identified that were not revealed through the Needs and Gap Analysis or survey.

Review of Current Programs and Activities

Determining need and gaps goes beyond qualitative and quantitative data analysis. It is also necessary to review what programs currently exist in the community to address the needs of qualifying populations and what activities are currently being funded. From looking at this information, the city was able to determine: 1) if there were unmet needs remaining and where those gaps existed; 2) if there are sub-categories of qualifying populations that have higher needs; 3) what eligible activities will have maximum impact in addressing unmet needs; 4) how much funding is needed to address unmet needs; and 5) how to effectively leverage resources.

Local, State, and Federal Resources

Based on the data and information gathered and incorporated into this plan, development of affordable rental housing was determined to be a high need. Though the city has received this special allocation of HOME-ARP dollars, leveraging of resources may be necessary to carry out projects of this size. The city completed a review of available local, state, and federal resources to determine if development of rental housing was an option that could become a successful strategy in addressing the needs of qualifying populations.

Organizational Capacity

A review of organizational capacity helped the city determine gaps in the service delivery system. Many organizations serving qualifying populations stated that they have experienced staffing issues, have a lack of funding to administer increased programs and services, and one revealed that it may be stepping down from its role in rapid re-housing activities. This information was considered when determining level of need and gaps.

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:

For the purposes of its HOME-ARP activities, in cases where the city must solicit services from developers, service providers, or contractors, local, state, and federal procurement guidelines will be followed, specifically in accordance with 24 CFR Part 85. All purchases or solicitations for services will be handled fairly and in a manner that encourages full and open competition. Depending on the type of service being procured and the dollar amount involved, the city will use either: 1) small purchase procedures; 2) sealed bids; 3) or competitive proposals.

When soliciting applications for funding the city issues a Notice of Funding Availability (NOFA) and implements the following process:

1. The city releases the NOFA, which identifies the amount of available funding, eligible activities, location, and deadline for applicants to submit proposals.
2. The city hosts an online applicant workshop to provide guidelines and answer questions related to the NOFA.
3. Housing and Community Development (HCD) staff score and vet applications/proposals and determine funding recommendations based on established selection criteria.

If the city determines the use of a sub-recipient is necessary to carry out any of its HOME-ARP programs or activities, at its discretion, the city may designate a qualified and responsible entity to this role or solicit proposals from multiple organizations. The city will utilize an inter-agency agreement or sub-recipient agreement, as applicable, to ensure activities are carried out in accordance with federal regulations.

Describe whether the PJ will administer eligible activities directly:

The city's Housing and Community Development Department intends to remain the lead agency responsible for the administration of its HOME-ARP allocation and related eligible activities. The city is proposing to develop affordable rental units and may designate a sub-recipient or solicit proposals from qualified applicants to provide property management or master-leasing services. Sub-recipients will be obligated to comply with all federal regulations pertaining to the HOME and HOME-ARP programs but ultimately the HCD Department will be directly responsible for

oversight, monitoring, and reporting as well as other applicable program administration requirements.

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

The city will not pre-award any portion of its HOME-ARP administrative funds to a sub-recipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

Use of HOME-ARP Funding

Funding Allocation Plan			
	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 1,673,343.15		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 295,295.85	15 %	15%
Total HOME ARP Allocation	\$ 1,968,639		

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

The city’s determination for use of funds is directly informed by the priority needs identified from the gap analysis and community engagement efforts. The needs assessment and gaps analysis revealed several patterns of unmet needs for qualifying populations in the City of Gainesville, in

particular the need for additional beds for individual adults and additional affordable rental units targeted towards households at or below 30% AMI.

The majority of the homeless population within the Gainesville area are single adults without children. As of the 2022 PIT count, there were 794 individual adults identified as homeless, 31 of them being young adults between the ages of 18-24 while the other 763 were over 24 years of age.

In addition, qualitative data from consultation and public participation indicated a strong need for access to affordable rental units. Nearly 100% of participants and service providers engaged in consultation listed development of affordable rental housing as one of three top priority needs.

As a result of this analysis, the city will utilize 85% of its total HOME-ARP allocation towards the development of affordable rental housing. This solutions-based approach is intended to increase affordability for vulnerable and at-risk populations seeking safe, decent housing and diversifying the housing stock addresses the need for smaller rental units that can serve homeless adult individuals and households at or below 30% AMI, amongst other qualifying populations.

The remaining 15% of funds will be utilized for grant administration.

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:

To determine activities that will have the greatest benefit to qualifying populations in the City of Gainesville, it is imperative to consider the existing housing profile. Current shelter resources show 326 emergency shelter beds available, of which only 23 are located in non-congregate shelter settings. The shelter utilization rate is 87%, with the lower rate being attributed to accommodating social distancing throughout the COVID-19 pandemic. The city also has the capacity to expand beds by nearly 72% through additional seasonal and overflow beds. Based on these characteristics, there is not an identifiable need for shelter expansion.

Further, analysis of gaps in the housing inventory and service delivery system stated access to affordable units, access to services, and landlord participation as major barriers for Gainesville's qualifying and vulnerable populations. Lengthy wait list for public housing units and vouchers exacerbates homelessness and continues to put vulnerable populations at-risk and limited access to transportation and lack of landlord participation means decreased access to services or permanent affordable housing options.

The data mentioned above along with feedback received during the consultation process provided the rationale to fund the development of affordable rental housing. The city's strategy is to develop rental units and pair that activity with features such as master-leasing and mentor programs to help with access to services and landlord participation. In addition to meeting the immediate housing needs of its qualifying populations by increasing access to affordable units, the city's approach to

development of rental housing offers several other benefits including: 1) supports long-term affordability and permanent housing; 2) addresses the unmet need for unsheltered single adults or smaller rental units (1-bedroom); 3) supports inclusion with scattered site housing; 4) diversifies the housing stock; 5) supports equitable development; and 6) promotes consistency with comprehensive plan and consolidated plan goals.

HOME-ARP

Production Goals

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

The city has \$1,673,343.15 available to carry out small scale development of affordable rental housing and is proposing to develop approximately fifteen (15) rental units through redevelopment and construction of scattered site Accessory Dwelling Units (ADU's). The intention is to utilize all units to provide shelter or house individuals meeting one or multiple qualifying populations as defined in the Notice, however no more than 30% of the total units assisted with HOME-ARP funding will be occupied by low-income households not meeting a qualifying population.

The proposed production goal is an estimate based on current costs of construction and is subject to change with the market. The city will closely monitor fluctuations in pricing and may have to adjust production goals accordingly.

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 city intends to decrease homelessness and provide housing stability for qualifying populations through the development of decent, safe, and sanitary rental housing. The city's strategy to increase access to housing units for its most vulnerable populations includes redevelopment of city-owned lots and construction of ADU's.

The city's redevelopment strategy will mitigate slum and blighted conditions, restore the existing affordable housing stock, increase access to affordable units, and decrease the number of individuals experiencing homelessness throughout the city. The approach includes redeveloping existing structures formerly used as relocation homes by HCD rehabilitation clients. Funds will be leveraged for the demolition of these homes, which have previously been determined to be unsuitable for rehabilitation, and each lot will be reconstructed using HOME-ARP dollars. In an effort to maximize the number of affordable units created, the city will consider several housing options including single-family, duplex, townhome, and condominium concepts and will determine if ADU's can be constructed on site as additional rental units intended to house qualifying populations.

The city will also implement an Accessory Dwelling Unit (ADU) Pilot Program. The construction of ADU's is an affordable housing solution that is gaining traction across the nation and provides multiple benefits for low-income and vulnerable populations as well as homeowners themselves. Creating affordable units through the construction of ADU's is also a goal in the city's Comprehensive Plan, meaning that land use regulations have already been modified to allow for

this type of housing. The city has recently seen a rise in interested residents wanting to construct ADU's and has issued nearly 40 permits since its inception. This strategy is a great way to champion affordable housing efforts while addressing the unmet needs of qualifying populations, specifically the need for additional beds to shelter individual adults. This type of housing is multi-faceted as units can be used as permanent housing or emergency shelter.

The ADU strategy involves participation by local homeowners willing to construct a unit on their property. To incentivize homeowners to participate, the city will underwrite either a portion of construction costs or fully fund the project. The city will partner with local qualified and experienced architects to design three (3) ADU floorplans which will be available to homeowners to choose their preference.

The city will coordinate with the Planning Division and internal legal team to identify and determine the best model for administering the ADU Pilot Program and to develop policies, terms, and criteria. Period of affordability agreed to by the homeowner may be a factor in determining assistance amounts, however all units will maintain a period of affordability no less than 15 years. Homeowner participants will be subject to terms and conditions to maintain compliance with local, state, and federal requirements, including lien placement on the home. The city will use its current HOME recapture guidelines for the ADU program, reviewing and revising as necessary to comply with HOME-ARP regulations.

In addition, the city will pair its rental strategy with master-leasing. Qualifying populations are often discriminated against for not having reliable income, for having a housing voucher, or for having previous evictions on their records. Implementing a master leasing strategy can eliminate discrimination barriers and significantly increase access to affordable housing for qualifying populations.

The city's redevelopment goals and ADU program goals will provide a significant benefit to qualifying populations and address the priority needs identified in this plan in the following ways:

- Increase affordable permanent supportive housing options and emergency shelter options for qualifying populations, including for the city's most vulnerable populations:
 - Homeless, or at-risk of becoming homeless
 - Elderly
 - Individuals with Disabilities
 - Kids aging out of foster care
- Creates units to address the need for smaller (1–2-bedroom units) serving individual adults.
- Provides the potential to pair qualifying populations with mentors/sponsors for better access to services.
- Supports long term affordability and permanent housing options.

- Increases landlord participation in affordable housing programs.
- Promotes inclusive/integrated housing options as units will be scattered site.
- Diversifies the city's housing stock supporting fair housing choice.
- Supports equitable development throughout the city.
- Master leases provide stability to both the property owner and the tenant. The owners get dedicated cash flow, and the tenants get affordable housing with additional protections.

Preferences

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

The city will not give preference to one or more qualifying populations or a subpopulation due to the high demand for access to affordable housing for all vulnerable residents. Not giving preference allows the city to address the immediate needs of individuals meeting a qualifying population as the need arises.

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:

Not applicable.

Referral Methods

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 city will work closely with its housing partners, non-profit service providers, and the Continuum of Care to establish a referral method for applicants to be placed on a wait list for available rental units. Since the current Coordinated Entry System (CES) established by the Continuum of Care (CoC) does not include those fleeing domestic violence or those at risk of homelessness, the city will receive referrals from multiple sources and not solely rely upon the CE process. In establishing the referral process and maintaining a wait list, the city will ensure compliance with federal HOME and HOME-ARP regulations as well as the Fair Housing Act. Referral policies and procedures will be developed in a manner to provide equal opportunity to qualifying populations. Overall, the city's process will involve receiving direct referrals from partner organizations as well as accepting referrals from the CoC based on CE priorities. Referrals from the CoC will strictly be to place applicants on the wait list and not directly in a unit.

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):

The city's process involves accepting referrals from multiple sources and not relying solely on the CES. However, the city will be accepting referrals from the CoC who does use CE. The current CES does not include those fleeing domestic violence or those at risk of homelessness. Referrals for these sub-categories will be provided by the city's housing partners and non-profit service providers not utilizing CE. Because the city will receive referrals through multiple methods, the CES will not be amended or expanded at this time.

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):

Though the city will receive referrals multiple ways, the CoC will be a key partner in forwarding applicants for the wait list. The CoC does make referrals using CE which establishes priorities within the system. The CES prioritizes individuals currently experiencing homelessness, which are highly vulnerable to death without housing. Those at risk of homelessness will be prioritized last. Within this category, other populations including seniors, those with disabilities, and veterans will be prioritized over those at general risk of homelessness.

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):

The city recognizes that decreasing homelessness requires a multilayered response to addressing the unmet needs of qualifying populations. While there are different needs for each subcategory mentioned under this plan, the data shows similar trends affecting all qualifying populations. The city chose to fund a strategy that will immediately and effectively help to decrease homelessness and that will provide housing stability for all qualifying populations. Because of this, the city has chosen not to identify preferences, and referrals received from housing partners, non-profit service providers, and/or the CoC will be treated equally on a first-come, first-served basis.

Limitations

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

The city does not intend to limit eligibility for its HOME-ARP rental housing strategy to a particular qualifying population or specific subpopulation of a 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:

Not applicable.

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

Not applicable.

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 city does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

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*

Not applicable.

- *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.*

Not applicable.

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

Not applicable.

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

Note applicable.

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

Not applicable.

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

Not applicable.

