

HOME-American Rescue Plan Allocation Plan



DRAFT

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Participating Jurisdiction: Aurora, Colorado

Date: 2/20/2023

Introduction

In September 2021, the U.S. Department of Housing and Urban Development (HUD) announced the allocation of \$4,149,712 to Aurora, Colorado a new grant called the HOME Investment Partnership American Rescue Plan Program (HOME-ARP). The purpose of HOME-ARP funds is to provide homelessness assistance and supportive services through several eligible activities. Eligible activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing development, administration and planning, and nonprofit operating and capacity building assistance.

HOME-ARP funds must assist people in HOME-ARP "qualifying populations" (QPs), which include:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness or those at greatest risk of housing instability or in unstable housing situations

To receive funding, the City must develop a HOME-ARP Allocation Plan which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. This plan will be submitted and approved by HUD. The development of the HOME-ARP Allocation Plan must also be informed through stakeholder consultation and public engagement. The following is the City's HOME-ARP Allocation Plan.

Consultation

Summarize the consultation process:

The City's consultation process consisted of developing and disseminating an online stakeholder survey as well as direct interviews in order to capture broad assessments of the community needs and areas for ARP allocation. The online survey was open from January 9, 2023, through February 28, 2023. The survey sought insights into housing and supportive service needs and stakeholder's input for the community needs assessment. The survey received 14 respondents, including those representing homeless services providers, the Continuum of Care (CoC), the housing authority, fair housing advocates, homeless service providers, domestic violence advocacy groups, and others.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Metro Denver Homeless Initiative	CoC Lead	Survey	Lack of affordable rental housing remains the top gap for those at-risk of homelessness. Homeless prevention supportive services are also highly needed, as is TBRA. Developing affordable housing and assisting with homeless prevention are needed. Case management is top need for supportive services, but we also need better/more Outreach, homeless prevention support, housing counseling, mental health care, substance abuse treatment.
Aurora Housing Authority	Housing Authority	Survey	Not enough shelter spaces for families experiencing homelessness and transitional housing spaces. There is a high need for HOME HP and RRH programs and staff to provide case management. One-time rental assistance on arrears is helpful but if families and individuals are not connected to a housing case manager working with them on a plan for housing stability, then often times folks return to the cycle of falling behind on rent and being at-risk of being evicted or they do end up evicted. Insufficient transitional housing and/or housing with supportive services. Need more affordable housing units throughout City. Homeless prevention, education, life and job training all needed, as well as mental health services. NCS is especially important for families given that many don't utilize Comitis overnight family shelter due to congregate setting and having to enter in a lottery each day to find out if they qualify for a place to stay that evening.
Aurora Mental Health Center	Organization Serving People with Disabilities; Veterans Group advocacy	Survey	Gaps within the current shelter and inventory include limited inventory, limited subsidies available, and time frame to process applicants. Project based assistance and rental subsidy assistance are needs for TBRA. For affordable rental housing development, there is a critical need for capital investment to build new product- dollars should be made available for

			pre-development soft costs/due diligence/acquisition and for hard cost construction.
Gateway Domestic Violence Centers	Domestic Violence Service Provider	Survey	NCS would be best use of funds. Most needed supportive services are Housing Counseling Most Needed, Legal Services, Mental Health Services, Outpatient Health Services, Case management.
Ready to Work Aurora	Homeless Service Provider	Survey	High needs include more affordable rental housing and rental assistance. We also have major gaps in public awareness. Some organizations know about each other, but the general public is struggling to connect the pieces to get the assistance they need. Additionally, once they find out about the shelter and housing inventory opening the "window of opportunity" has closed due to the overwhelming need. Continue to seek feedback from organizations that are doing the work and run into barriers that could affect how they continue providing the necessary programs and services. Ready to Work Aurora depends on municipalities and companies to contract with us, so our Trainees and graduates can work...Thank you for believing in our program.
UCHealth	Public Health	Survey	Non-congregate shelter and transitional housing are most needed! I almost exclusively see gaps within our current shelter in Aurora. Comitis is often unhygienic, not trauma informed, and they are inconsistent with their services--especially food. We need more affordable housing, rental assistance, and shelter units. Non-congregate shelter is much more trauma informed than congregate shelter. Folks are more inclined to stay in private space vs. sharing a room and bathroom with several other people. Also, this allows couples/families to stay together easier. Safer option for the gender expansive.
Bridge House Ready to work	Homeless Service Provider	Survey	Affordable housing, background approval is limited, shelters are limited in Aurora. Comitis is limited. We need more night and day shelter with supportive services and navigation. We need day and night shelter that require support services in Mental Health addiction job training and getting identification and ssn card. Should be a requirement to stay is

			working on these things . We don't need more wet shelters. We have a challenge of housing people due to past evictions, or fair credit as well as being able to afford a home if they have children . The wages don't match the cost of rent.
The Salvation Army SOS (6th/Chambers location)	Homeless Service Provider	Survey	There is a severe lack of shelter space in the city, and I believe the response to the camping ban should not be 4 weeks of shelter at the Safe Outdoor Space sites or overfilling existing congregate shelters. It is a "band aid fix" to the issue that is both ineffective and actively harmful to people experiencing homelessness by causing further trauma for them. To expect us to run on a model of "recycling" individuals through this system is not trauma informed or effective. We have encountered folks who have had all of their belongings thrown away in sweeps and were brought to the SOS with the bare minimum, only to have to go back to the streets, in the dead of winter, one month later. This is no fault of our case managers, it is simply impossible to take an individual who has no resources, income, or identification documents and get them into permanent stable housing within 30 days. NCS needs Trauma-informed and an effective model. Ultimately, we need more time with clients and the abatement program is ineffective. Accessible mental health services, continuous case management post-housing, and more housing programs for our clients
City of Aurora	Housing and Community Development, Fair Housing	Survey	There are enough affordable housing units available for people to rent. More affordable housing and NCS shelter development are need. Supportive services needs include outpatient health services, mental health services homeless prevention and case management and landlord/tenant liaison as the most needed.
VIVENT HEALTH	Organization Serving People with Disabilities, Fair Housing Organization	Survey	Home-ARP funds should be used to increase available NCS units and increase the availability of quality affordable rental housing. Homeless prevention and Substance abuse treatment services are also highly needed services.
Cherry Creek School District	School District Homeless Liaison	Survey	Unmet needs include affordable Rental Units Availability, McKinney-Vento Supportive Services, and rental assistance. Lack of shelter

			space for families. Lack of affordable housing. Need a community wide resource line to act as a one stop shop for resources.
Arapahoe County	County Government, Fair Housing	Survey	There is one emergency shelter in Arapahoe County. The shelter is often full, there are also restrictions regarding who can stay where in the shelter. This oftentimes separates families already experiencing trauma. More emergency or non-congregate shelter is highly needed. Access to safe, affordable housing that isn't segregated to lower income areas. Lack of resources available to address prior evictions-leaving families in hotels or shelter. Transportation is an issue many families face. Cost of food has increased and monthly allotments that were increased due to pandemic will be stopping but high need still there.
Community Economic Defense Project	Homeless Service Provider, Organization Serving People with Disabilities, Continuum of Care Member	Survey	Affordable housing inventory is scarce. Most units that are affordable fall under LIHTC regulations that have cumbersome application processes and strict background requirements, disproportionately excluding BIPOC communities. Highest priority needs include tenant-based rental assistance, and housing counseling services and homelessness prevention services. Most needed supportive services include homelessness prevention, housing counseling, legal services, case management, and landlord/tenant liaison services. Securing housing is becoming more challenging due to landlords circumventing source of income discrimination law by requiring funds upfront in order to lease a unit, which makes it difficult for people on housing subsidies to meet the requirement and secure housing to transition out of homelessness.
Houses for Warriors	Nonprofit transitional home for veterans	Survey	Transitional housing support for homeless veterans.

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:

- ***Public notice: 01/30/2023 (City website); 02/02/2023 (Aurora Sentinel newspaper)***
- ***Public comment period: start date – 1/30/2023 end date - 2/21/2023***
- ***Public hearing: 2/14/2023***

Describe any efforts to broaden public participation:

The City of Aurora held one public hearing to discuss the development of the HOME-ARP Allocation Plan, which incorporated information and discussion of community needs and eligible activities related to HOME-ARP, along with an opportunity for the public to provide comments on the proposed budget and activities. A list of eligible HOME-ARP activities and the City's proposed HOME-ARP budget was also presented. The draft Allocation Plan was also posted on the City's website for public viewing and comment.

Summarize the comments and recommendations received through the public participation process:

Housing First – Not contingent on substance abuse is important. Consider the tiny home villages that we have utilized – ensuring people do not end up on our streets at all.

Many homeless persons have employment cut – work in jobs that don't offer disability (short-term) and don't receive services to keep them off of the streets. Housing First should be a priority.

Homelessness was happening before COVID – COVID exacerbated it. Mental Health exacerbated it. Substance abuse is an issue.

There is a lack of job training, but there is a major housing shortage – exacerbated in the Denver area -rapid population growth. Cost of living soaring – progressive laws on substances.

Potentially collaborate – Food is a good focus for this discussion.

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

Comments were accepted.

Needs Assessment and Gaps Analysis

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

Homeless as defined in 24 CFR 91.5

The CoC releases an annual Point-in-Time (PIT) Count that includes valuable data for addressing the needs of residents who are experiencing homelessness. The 2020 Metro Denver CoC PIT count data was used to capture the most recent and relevant homeless population data due to alterations in methodology during the 2021 count to mitigate the effects of the COVID-19 pandemic. It is noted that the Continuum of Care's jurisdiction is the entirety of Adams, Arapahoe, Boulder, Broomfield, Denver, Douglas, and Jefferson Counties so the data reflected in the PIT count is for the county, some numbers may not accurately capture the precise counts of the jurisdiction. Therefore, estimates and rates combined with stakeholder input have led the overall content of estimated composition.

According to the 2020 PIT count, White/ Caucasian residents are the largest demographic of people experiencing homelessness. Just over 59% of people experiencing homelessness are White/ Caucasian. 23% are Black or African American and the remainder are American Indian or Alaskan Native, Native Hawaiian or Other Pacific Islander, Asian, or multi-racial. 24% percent of overall homeless are Hispanic/ Latino. 67% of homeless individuals identify as Male. 79.5% are over the age of 24 and 14% being under the age of 18, mostly in households with other adults. About 30% were reported as chronically homeless. 2,091 individuals reported having a mental illness, 1,766 reported having a substance use disorder, 627 are veterans, 278 are unaccompanied youth, and 658 are victims of domestic violence.

Homeless Needs Inventory and Gap Analysis Table

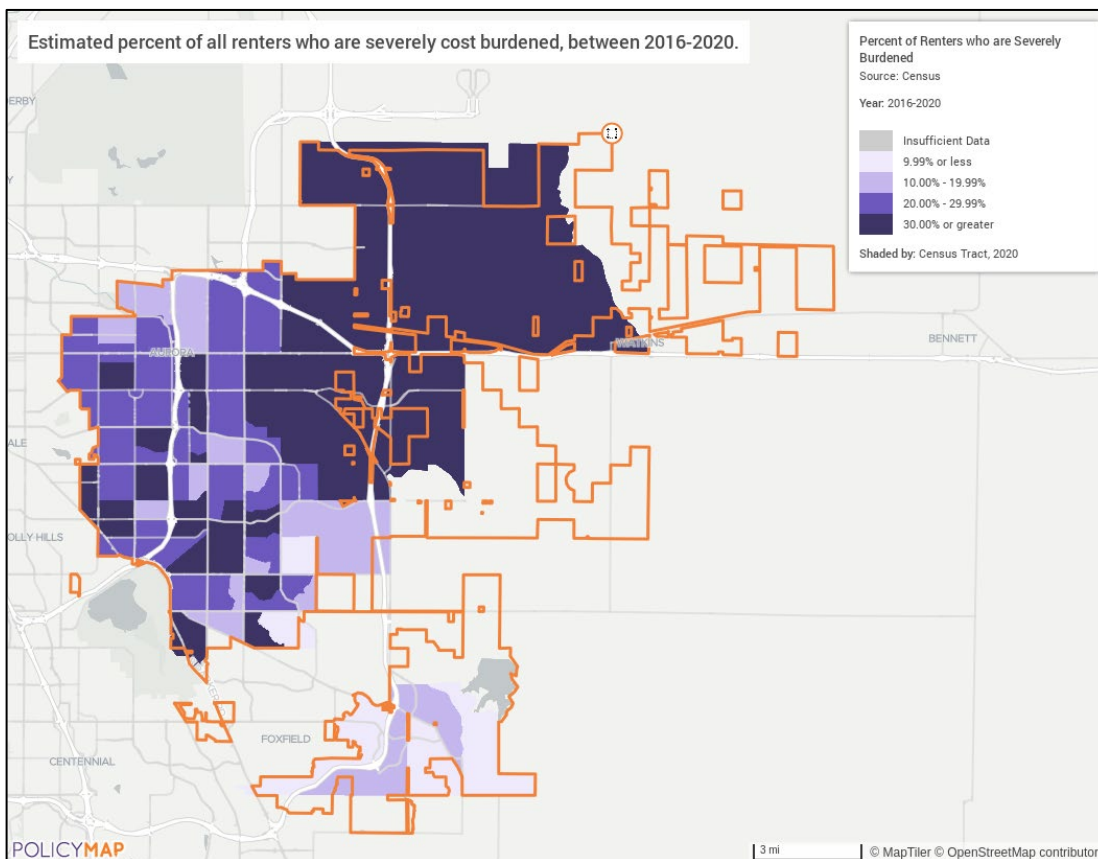
Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	627	169	2,656	2,656	0								
Transitional Housing	1,395	336	797	797	226								
Other Permanent Housing						--	--	--	--				
Sheltered Homeless						409	2,861	462	528				
Unsheltered Homeless						12	1,433	165	130				
Current Gap										--	84	-841	-841

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

Populations At-risk of Homelessness as defined in 24 CFR 91.5

HUD defines those at risk of homelessness as individuals and families who have an income at or below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability. Using HUD's 2014-2018 Comprehensive Housing Affordability Strategy (CHAS) data, the city has 14,540 households with incomes at or below 30% AMI, (over 11% of all city households). More than sixty eight percent of these households are renter households. Households at-risk of homelessness include an estimated 19,480 households who are severely cost burdened, paying over 50% of their income toward housing and 25,200 who are cost burdened (above 30%, less than 50%). Of the severely cost burdened, 7,065 are renting households who are also in the extremely low-income range ($\leq 30\%$) and considered at greatest risk of housing instability. An estimated 25,125 LMI ($\leq 80\%$ AMI) renters are cost burdened at the 30% mark, approximately 26% of total households in the City.

Additionally, according to 2014-2018 CHAS, there are 9,975 renters earning less than 30% AMI. In Aurora there are only approximately 3,876 rental units offer a gross rent price within the needed range to prevent being cost burdened. In other words, there is a lack of about 6,099 affordable rental units for extremely low-income households. Below is a geographical estimation of severely cost burdened renters by census tract, displaying major portions of the City having over 30% of the renters as paying over 50% of income toward housing costs.



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

According to the National Coalition Against Domestic Violence 36.8% of women and 30.5% of men in Colorado experience intimate partner physical violence, intimate partner sexual violence and/or intimate partner stalking in their lifetimes. According to the FBI Criminal Justice Information Services Division's 2021 National Instant Criminal Background Check System as of December 31, 2021 Colorado has submitted 502 domestic violence misdemeanor and 361 active protective order records to the NICS Index.

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 is a large overlap between those at-risk of homelessness (above data) and households in need of assistance to prevent homelessness or at greatest risk of housing instability. Lack of affordability is the primary issue highlighted in data and consultation. According to CHAS, of the severely cost burdened, 7,065 are renting households who are also in the extremely low-income range (<=30%) and considered at greatest risk of housing instability.

While we don't have data that matches the exact definition of QP #4, we can glean general demographics and need from looking at the City's poverty levels. Poverty is often a direct correlation as it relates to households requiring housing assistance to prevent homelessness or to those being at-risk of housing instability. According to ACS, there are 39,445 (10.4% of City) residents below the poverty level, of which 35% are under 18 years old. Of those living under the poverty level, an estimated 17,217 are White, 9,064 are Black or African American, 3,652 are Asian, 3,177 are mixed race, and 15,655 are of Latino origin. There are more females (20,890) under the poverty level than males (18,555).

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

The primary unmet need as it pertains to homeless needs inventory is the availability of beds and units for adults who are experiencing homelessness. There is a need for over 800 beds in order to provide housing services for all unsheltered adults identified in the PIT Count. Additionally, beds specifically for people with mental illnesses and critical health issues were recognized as a specific need. There is also a lack of shelter and transitional beds dedicated for homeless Veterans with the CoC needing an additional 400 beds.

Service needs for both sheltered and unsheltered persons include a greater capacity to offer healthcare services, disability assistance, mental healthcare, childcare, as well as housing counseling, financial workshops, job training, skills training. Supportive services and assistance in transitioning out of emergency shelters and into permanent housing is a primary service need. The need for improved case management has been an observation made by many stakeholders. Challenges of a lack of affordable housing, supportive services, and a need for emergency shelter were a common unmet need themes highlighted from the stakeholder's input.

Populations At-risk of Homelessness as defined in 24 CFR 91.5

ACS estimates approximately 58% of the city's renters are costs burdened (paying over 30% of income to housing costs), or approximately 28,426 total renter households. Lack of affordable housing inventory and a persistent affordability gap challenge both populations recovering from homelessness and those households at risk of homelessness or housing instability. Those at-risk of homeless or housing instability often need short-term subsidies such as mortgage/rent assistance to avoid foreclosure or eviction, as well as utility assistance to avoid shutoff or security deposits to allow new rental contracts.

Supportive services such as housing or financial counseling, landlord mediation for eviction proceedings will also benefit these groups. Healthcare assistance greatly benefits those at-risk of housing instability who are also disabled or elderly.

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

According to the 16th Annual (2022) Domestic Violence Counts Report for Colorado conducted by the National Network to End Domestic Violence victims of domestic violence made 245 requests for shelter, housing, and other supportive services that providers could not provide. With approximately 56% of these unmet requests being for housing and emergency shelter. Victims of domestic violence or human trafficking have unique needs as it relates to housing, safety, and support. Domestic violence or human trafficking survivors often lack easy access to short-term shelter and quick access to medical and psychological services. They need specialized housing security, healthcare, and counseling services (to included networking and economic independence). NCS would highly benefit this QP.

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

The unmet needs for the populations needing assistance to prevent homelessness or at risk of greater housing instability mirror those from above, including rental payment assistance or utility deposit assistance and development of affordable rental housing units. Those requiring housing assistance to prevent homelessness or those at greatest risk of housing instability often need short-term subsidies such as mortgage/rent assistance to avoid foreclosure or eviction, as well as utility assistance to avoid shutoff or security deposits to allow new rental contracts.

Further, housing counseling, landlord intervention/liaison assistance, and homeless prevention were highlighted during our consultation as service needs for those at greatest risk of housing insecurity.

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:

Metro Denver Homeless Initiative (MDHI) serves as metropolitan Denver area's Continuum of Care (CoC). MDHI coordinates services and housing for people experiencing homelessness. They partner with local agencies and organizations to coordinate street outreach, emergency shelter, transitional housing, rapid rehousing, prevention and diversion, and permanent supportive housing.

Aurora@Home (A@H) Collaborative Housing Providers is a coalition of Aurora-based agencies and organizations that are working to implement Aurora's 10-year plan to end homelessness. A@H is a partnership between multiple nonprofits, the City of Aurora, and both Arapahoe and Adams Counties. Through A@H, the City coordinates affordable housing, wrap-around services, and case management to provide individualized support for homeless persons and families. They assist with the management of about 60 rapid re-housing units, and provide short- and medium-term rental assistance and case management.

Aurora Mental Health Center (AUMHC) manages 52 units of transitional housing at Aurora Veterans Home, John Thomas House for adults, and Ursula for Wellness Court. They also manage about 230 permanent supportive housing beds in collaboration with organizations such as Fitzsimons Recovery Apartments, Mirachek House, Hanover Street, Ruth Campbell Apartments and more in addition to providing Section 8 vouchers, shelter and care vouchers, and state housing vouchers.

Colorado Coalition for the Homeless (CCH): Forest Manor operates 16 affordable permanent supportive housing units specifically reserved for individuals with severe mental illness who were formerly homeless.

Aurora Housing Authority (AHA) manages 15 transitional housing beds for the Family Unification Program. They also operate 18 units of rapid re-housing, 135 permanent supportive housing vouchers, 110 VASH vouchers for veterans, and 35 Family Unification Vouchers.

Gateway Battered Women's Services manages 25 emergency shelter beds and 15 temporary shelter beds that allow for a stay up to 120 days. Gateway shelter beds are specifically designated for victims of domestic violence. They provide supportive services in addition to temporary housing.

Mile High Behavioral Healthcare/Comitis Crisis Center provides about 140 shelter beds, including 81 emergency shelter beds, 40 temporary or longer-term shelter beds, and 18 transitional housing beds. They also open overflow beds during cold weather to accommodate more individuals and families. MHBH provides behavioral health services in addition to housing in order to serve vulnerable populations in the Aurora and the metropolitan Denver area.

Aurora Interfaith Community Services operates a food bank and provides clothing, emergency medication, bus tickets, referrals, and other resources for homeless persons in Aurora.

Aurora Warms the Night provides emergency cold weather motel vouchers in temperatures below 20 degrees in addition to food, winter clothing, hygiene kits, and referrals to additional services for qualifying populations.

Multiple Aurora organizations provide employment counseling and job training, including **Second Chance Center, Arapahoe/Douglas Works!, and Adams County Workforce.**

Safe House Denver is a 24-hour crisis and information line for legal, housing, and emotional support for victims of domestic violence.

Restoration Project International is an organization that provides support and advocacy for survivors of human trafficking and domestic violence. They provide life skills education, workforce development, mental health support, and empowerment programs to help survivors build resilience and rehabilitate their lives.

Asian Pacific Development Center provides culturally appropriate mental and behavioral health services, healthcare, adult education, and more for Asian immigrants and refugees.

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

There are multiple unmet needs affecting this population. As noted above, one of the primary gaps in the shelter and housing inventory is the availability of beds for adult only households, as well as homeless families. There is a need for approximately 850 additional beds. Additionally, the vast majority of beds are emergency beds. Most stakeholders supported the need and benefits that would come with development/acquisition of on-congregate shelters in the city (none disapproved, some were unsure of the level of need).

There is also an unmet need of supportive services for all QP categories who need a variety of assistance in building professional and social skillsets, health assistance, to include mental and behavioral therapy, case management, and other services.

The availability of housing units does not meet the needs of the qualifying population. As previously highlighted, there is a lack of approximately 6,100 affordable rental units solely for households making under \$20,000 a year. The lack of affordable housing has led to cost burden issues for households across the income spectrum, with the most vulnerable being the extremely-low-income. There is a need for quality affordable housing units of multiple sizes in neighborhoods throughout the city. Whether new construction or housing rehab that adds rental units to the market, this is a high priority.

The Aurora Housing Authority reported the lack of available units to support its clients’ needs and the current waitlist highlights the lack of available affordable housing units as well as those unwilling to participate in the voucher programs.

Aurora Housing Authority Waitlist

Housing Choice Voucher	Closed, no names on waiting list.
Paris Family Apartments	Closed, 683 applicants
Peoria Crossing	Closed, applicants
Mainstream Housing Voucher	Closed, 465 applicants

Note: waitlist are a lottery that are conducted each March or April

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

The City of Aurora recognizes the definition of Other Populations set forth by HUD in the CPD Notice (Families Requiring Services or Housing Assistance to Prevent Homelessness or At Greatest Risk of Housing Instability). The criteria related to these categories include households/persons who are (1) extremely low-income with a severe cost burden, or households with (2) an annual income that is less than or equal to 50% of the area median income meet one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5. No further characteristics of housing instability have been defined in the City’s ConPlan; thus the City will use the criteria listed in first six conditions listed in the “At risk of homelessness” definition established at 24 CFR 91.5.

Identify priority needs for qualifying populations:

The analysis above and consultation with key stakeholders have identified the following priority needs:

1. Lack of Affordable Rental Housing
2. Rental assistance / affordability assistance
3. Lack of sufficient shelter units/beds for single adults with no children
4. McKinney-Vento Supportive Services

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

To determine the level of need and gaps, Aurora looked at both qualitative and quantitative inputs. Data from the U.S. Census and CHAS data were used in partnership with feedback and on-the-ground insights from key stakeholders in the area in the development of this plan. Online stakeholder survey input and feedback described various needs, but lack of affordable housing and a higher need for supportive services and agency capacity building were recurring themes. The need for affordable rental housing was determined by evaluating data sources and community partner input which supports the need for rental development that will be affordable

and remain affordable. Additionally, the need for long-term supportive services or case management to achieve housing stability has been identified as a priority among qualifying populations.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

The City expects to administer programs directly. Once the City has received the full HOME-ARP grant award from HUD, the City will determine which project(s) and developer or subrecipient(s) are eligible to apply for funding, based on their ability to deliver on the priority needs identified within this plan. Each applicant will also be reviewed for their ability to carry out the project meeting all eligibility criteria.

Award(s) will be made based on the applicant's project scope as it pertains to the outlined priority needs in this plan as well as the City's final determination of projects receiving funding.

If any portion of the PJ's HOME-ARP administrative funds were 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 administer the program. The City has not yet used any portion of the HOME-ARP administrative funds.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services			
Acquisition and Development of Non-Congregate Shelters	\$3,734,741		
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing			
Non-Profit Operating		0%	5%
Non-Profit Capacity Building		0%	5%
Administration and Planning	\$414,971	10 %	15%
Total HOME ARP Allocation	\$4,149,712		

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:

There is a significant need for all eligible activities that could be funded with HOME-ARP funds. After reviewing the gap analysis for shelter and affordable housing availability, as well as analyzing local capacity and other sources of funding as it relates to community needs, the City identified eligible activities that are considered best-use for this limited, one-time allocation in order to assist individuals and families of the most vulnerable qualified populations. The HOME-ARP funding will be leveraged with other funding sources to help create a Navigation Center for homeless persons and households. HOME-ARP funding will support NCS development within this communitywide project.

One of the major gaps in the City's homeless inventory is access to non-congregate shelters. Emergency shelter and interim housing can help to fill this gap to strengthen the crisis response system. The HOME-ARP grant provides an opportunity to assist households with temporary supportive emergency shelter through the acquisition and development of non-congregate shelters. These shelters will not only help those experiencing homelessness, but they will also assist families or individuals who fleeing, or attempting to flee, domestic violence and sexual assault with the related privacy and security needs that this QP often requires.

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:

HOME-ARP funds will not be used for housing production, but rather for NCS unit production.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

Not applicable, the funds will be for NCS development.

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 has determined that it will not give preferences to one or more qualifying populations or sub-population within one or more qualifying populations for any eligible activity or project within its HOME-ARP Allocation Plan.

HOME-ARP Refinancing Guidelines

The City does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing.