



HOME- ARP Allocation Plan

DRAFT

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.

Seminole County's HOME-ARP allocation is \$3,046,438. 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:

Regulatory guidelines governing HOME-ARP funds require compliance with Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program* (the Notice), which sets forth minimum standards for consultation efforts. Seminole County consulted with a multitude of organizations, 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.

Citizen participation must be an integral part of the planning and implementation processes for the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME and HOME-ARP), and Emergency Shelter Grant (ESG) pursuant to the rules and regulations governing administration of the programs. The U.S. Department of Housing and Urban Development (HUD), in their attempt to assure adequate opportunity for participation by program beneficiaries and the general public, have prescribed minimum Consolidated Plan pre-submission, amendment, grantee performance, subrecipient monitoring and record maintenance requirements.

The County is not only interested in complying with federal regulations, but wishes to ensure that all county residents, and principally families with low or moderate incomes, have the opportunity to participate in the needs identification and strategy development process for these programs. The Citizen Participation Plan (CPP) outlines the steps developed by the county to ensure compliance with federal regulations governing implementation of the federal programs administered by the Community Services Department and meets their requirement to involve residents in the planning and implementation of related projects and programs.

The participation process involves scheduling, publicizing and conducting meetings and public hearings; providing technical assistance to applicants and other interested persons/groups, and

maintaining accurate and current information regarding the programs administered by the Community Development Division which is available to citizens upon request.

The county complies with its CPP when conducting outreach efforts. The CPP is intended to encourage residents of the Seminole County to participate in the development of the Consolidated Plan, any substantial amendments to the Consolidated Plan, and the Consolidated Annual Performance and Evaluation Report (CAPER). HUD and the county strongly encourage participation by all county residents, particularly residents of economically disadvantaged neighborhoods and communities and those persons living in areas designated by the county as a revitalization (target) area or in a slum and blighted area. Feedback is encouraged in areas where CDBG, HOME, HOME-ARP, and ESG funds are proposed to be used. Minorities, non-English speaking persons, and persons with disabilities are welcome to work with the county to assess local needs and plan projects to address them. 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.

Stakeholders were invited to participate through several methods including 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, participate in a quick poll regarding gaps in the homeless services delivery system, exchange ideas related to HOME-ARP funding priorities and best uses for reducing homelessness, provide public comments through a guestbook feature, and ask questions about the HOME-ARP program, funding eligibility, project efforts and more. Input was solicited via FHC Connect from December 15, 2022, through January 31, 2023.

Agencies providing services to qualifying populations were consulted directly via phone interviews where they were given the opportunity to share thoughts on unmet needs of qualifying populations and propose solutions for addressing such within the bounds of HOME-ARP regulations. Discussions also involved identifying gaps in the housing inventory and homeless services delivery system and establishing resources available for assisting qualifying populations. The direct consultation process encouraged stakeholders to involve their clientele in responses related to identifying priority needs. Direct consultations took place during January 2023.

The data received from the consultation process helped inform the funding priorities identified in this plan. See below for a complete list of participating organizations and the feedback received and considered.

List the organizations consulted:

Agency/Org. Consulted	Type of Agency/Org	Method of Consultation	Feedback
Seminole County Victims' Rights Coalition, Inc.	Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Sexual Assault, Human Trafficking	FHC Connect	Priority needs are development of affordable rental housing, non-profit operating funding and supportive services. Also need assistance for evictions and liens.
Florida S.P.E.C.S Inc.	Homeless, At-Risk of Homelessness, Veterans and Families that Include a Veteran Family Member	FHC Connect	Priority needs are development of affordable rental housing, acquisition and development of non-congregate shelter, and tenant-based rental assistance. Also, a high need for wrap-around support services.
Seminole County Committee on Aging	Veterans and Families that Include a Veteran Family Member, Elderly	FHC Connect	Priority needs are development of affordable rental housing, non-profit operating and capacity building, supportive services, and tenant-based rental assistance. Also, a need for personalized engagement with qualifying populations.

Embrace Families	Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Sexual Assault, Human Trafficking	Stakeholder Interview, FHC Connect	Priority needs are affordable rental housing reserved for families and young adults, non-profit capacity building, supportive services, and non-profit operating. Also, a high need specific to mental health services.
Homeless Services Network of Central Florida	Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Sexual Assault, Human Trafficking, Veterans and Families that Include a Veteran Family Member	Stakeholder Interview, FHC Connect	Lack of affordable housing units. Limited Family Emergency Shelter beds.
Central Florida Home for Good, Inc.	At-Risk of Homelessness, Homeless, Veterans and Families that Include a Veteran Family Member, Extremely Low, Very Low, and Low-Income Families	Stakeholder Interview, FHC Connect	Lack of affordable housing units and developers. Need for long term case management support service for use in combination with some of the existing housing vouchers.
Habitat for Humanity	At-Risk of Homelessness, Fleeing Domestic Violence, Sexual Assault, Human Trafficking, Veterans and Families that Include a Veteran Family Member; Families spending more than 35% of their income on housing; Precariously housed individuals and tenants living in subsidized housing.	FHC Connect	Priority needs are non-profit operating and capacity building, acquisition and development of non-congregate shelter, and supportive services.

<p>Aspire Health Care Partners</p>	<p>Homeless, At-Risk of Homelessness, Veterans and Families that Include a Veteran Family Member, Very Low, and Low-Income Families</p>	<p>Stakeholder Interview</p>	<p>Lack of affordable housing units assessable to households with no income, extremely low income and very low income. Access to 1st floor ADA affordable units. Support services are needed to help sustain housing. Support Services and housing options needed for those who are aging and/or have a higher level of care need. Fewer services and affordable housing options available for single adults.</p>
<p>Catholic Charities/Pathway to Care</p>	<p>Homeless, At-Risk of Homelessness, Veterans and Families that Include a Veteran Family Member, Very Low, and Low-Income Families, HIV/AIDs,</p>	<p>Stakeholder Interview</p>	<p>Lack of affordable housing units that are ADA compliant. Lack of support services for those needing assistance with daily living in the home. Lack of access to ALFs for aging populations or populations with need for higher level of care. Shelter and affordable housing options are limited for single adults.</p>

Seminole County Sheriff's Office	At-Risk of Homelessness, Homeless Fleeing Domestic Violence, Sexual Assault, Human Trafficking, Veterans and Families that Include a Veteran Family Member, Extremely Low, Very Low, and Low-Income Families	Stakeholder Interview	Lack of affordable housing units and financial assistance preventing evictions. Emergency Shelter beds. Single adults have few options for affordable housing programs. Need for transitional housing with programming and support services.
City of Sanford	At-Risk of Homelessness, Homeless Fleeing Domestic Violence, Sexual Assault, Human Trafficking, Veterans and Families that Include a Veteran Family Member, Extremely Low, Very Low, and Low-Income Families	Stakeholder Interview	Lack of affordable ADA units. Elderly disabled single adults are experiencing homelessness more often. Supportive Services needed for those leaving shelter to help sustain housing. Also need for TBRA and non-congregate shelter/transitional housing.
Hope Helps	At Risk of Homelessness, Extremely Low, Very Low, and Low-Income Families	Stakeholder Interview	Lack of affordable housing units and supportive services including childcare, credit counseling, and budgeting. Need for capacity building funding.

Rescue Outreach Mission	Homeless, Fleeing Domestic Violence, Extremely Low, Very Low, and Low-Income Families	Stakeholder Interview	Lack of affordable housing units. Lack of Family non-congregate shelter options.
Salvation Army	At Risk of Homelessness, Extremely Low, Very Low, and Low-Income Families	Stakeholder Interview	Lack of affordable housing units accessible to ELI and VLI. Financial assistance for prevention is needed as well as TBRA.
The Sharing Center	At-Risk of Homelessness, Homeless Extremely Low, Very Low, and Low-Income Families	Stakeholder Interview	Lack of affordable housing units dedicated to homeless, ELI, VLI. Lack of support services like case management to sustain housing.
First United Methodist Church of Sanford	Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Sexual Assault, Human Trafficking, Veterans and Families that Include a Veteran Family Member	FHC Connect	Priority needs are development of affordable rental housing, tenant-based rental assistance, and acquisition and development of non-congregate shelter.

Florida - Food Not Bombs	Homeless, At-Risk of Homelessness	FHC Connect	Priority needs are acquisition and development of non-congregate shelter, supportive services, and tenant-based rental assistance.
Florida – Step Up	Homeless, Veterans and Families that Include a Veteran Family Member	FHC Connect	Priority needs are supportive services, acquisition and development of non-congregate shelter, and development of affordable rental housing.
Good Samaritans	Homeless, At-Risk of Homelessness, Fleeing Domestic Violence, Sexual Assault, Human Trafficking, Veterans and Families that Include a Veteran Family Member	FHC Connect	Priority needs are supportive services, tenant-based rental assistance, non-profit operating, and development of affordable rental housing. Also, a need for mental health and medical services.

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

Direct consultation with providers serving qualifying populations provided the following feedback:

- Need for more affordable rental housing specifically for those that are 30%AMI and below.
- Emergency Shelter beds for families are very limited and a waitlist is maintained for these beds in the community.
- Support Services providing life skills, case management, and budgeting/financial literacy are needed as follow-up to someone getting housed so they can sustain housing.
- There is a high need for mental health services.
- There is an increase in the number of senior citizens with disabilities falling into homelessness because of the increased rental market.
- Need for rental assistance to offset inflation and rising rents.

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 county made the following information available to the public during the development of the HOME-ARP Allocation Plan:

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

Below represents dates information was made available to the public:

- ***Date(s) of public notice:*** The county published notices to solicit input on its HOME-ARP special allocation and to notify the public and stakeholders of plan availability for public comment and the public hearing date.
 - ***Community Engagement Online Notice:*** December 15, 2022, January 18th, January 20th, and January 27, 2023.
 - ***Comment Period Public Notice:*** March 5, 2023
- ***Public comment period:*** March 5 – March 20, 2023
- ***Date(s) of public hearing:*** March 14, 2023

Describe the public participation process:

By following its CPP, Seminole County carried out an expansive public participation process in an effort to maximize input received on its HOME-ARP allocation. The county 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 county staff were available to receive and comply with any requests for accommodation.

The public participation process was intended to solicit meaningful input to inform the use of its HOME-ARP dollars and encouraged residents, service providers, housing partners, and other stakeholders to get involved to identify funding priorities.

During the months of December 2022 through March 2023, county staff presented information and solicited comments related to the HOME-ARP allocation during a specialized lunch and learn session, through virtual engagement including surveys, polls, an ideas wall, and guestbook, through interviews with stakeholders, and through its standard public comment and public hearing process. Engagement methods included:

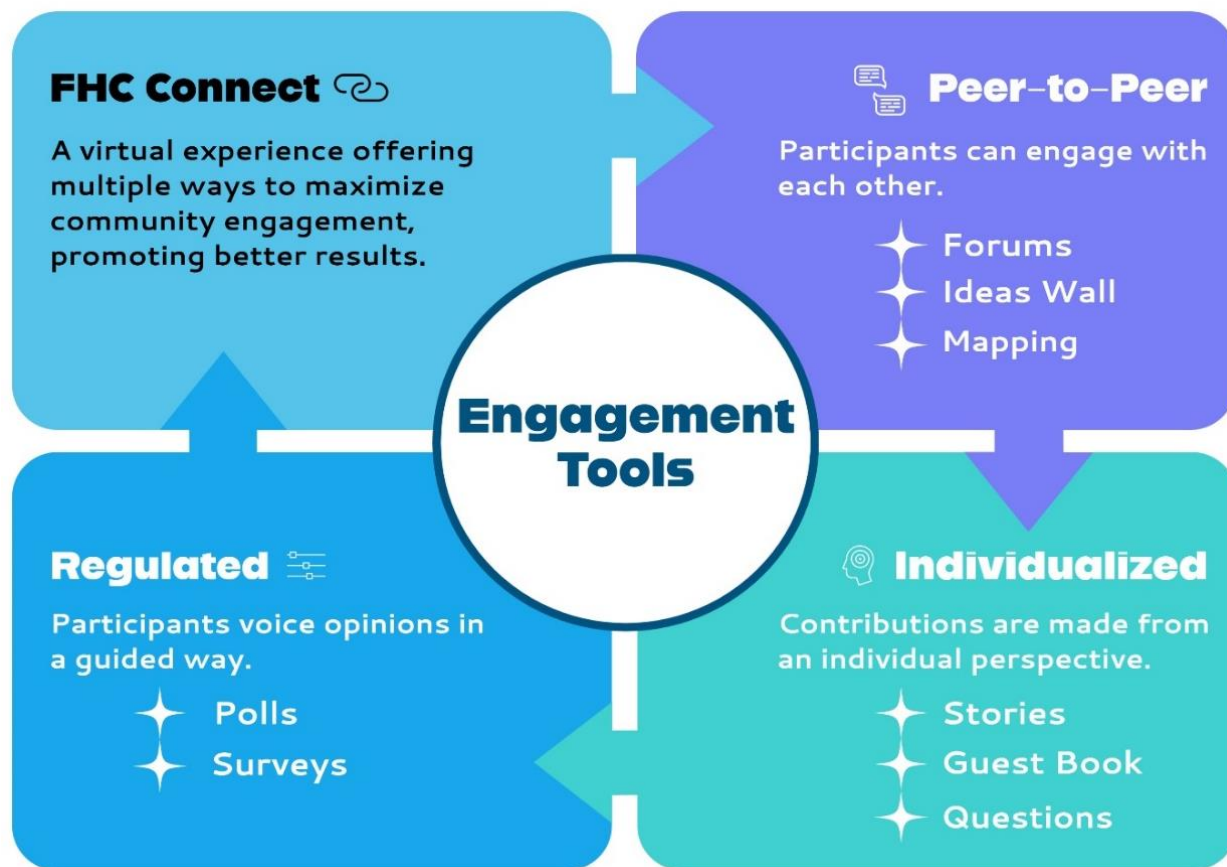
HOME-ARP Public Participation		
1	FHC Connect	December 15, 2022 – March 1, 2023
2	Provider Interviews	January 15 – March 1, 2023
3	HOME-ARP Lunch and Learn Session	January 25, 2023
4	Public Comment	March 5 – March 20, 2023
5	Public Hearing	March 14, 2023

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 county recognized this and committed to making changes to its planning process with the intentions of eliminating barriers to participation. While the county 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 county'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 county also broadened public participation efforts by facilitating a specialized HOME-ARP lunch and learn session on January 25, 2023. The county used this opportunity to inform the public about its HOME-ARP allocation amount, to define qualifying populations, and inform participants about HOME-ARP eligible activities, and the planning process. The lunch and learn session was open to the public and multiple notices were published via all social media outlets and by press release. A lunch and learn Frequently Asked Questions (FAQ) was created and disbursed to participants, offering responses to questions and comments received during the session.

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 516 visits of which 436 were aware (visited at least one page), 254 were informed (viewed, downloaded, visited, or contributed), and 95 engaged (contributed, participated, or posted).

There were 220 visitors and 75 contributors to the priority needs survey, primarily community advocates for qualifying populations at 31% of the participants.

Below summarizes input received from the priority needs survey related to the unmet needs of qualifying populations:

- Lack of affordable housing
- Need for a coordinated system for housing placement
- Rental assistance
- Wrap around support services
- Intensive case management
- Mental health services
- Lack of resources (housing and supportive services)
- Affordable housing for the elderly, disabled, and unaccompanied youth
- Substance abuse treatment
- Emergency intervention
- Employment training
- Landlord participation
- Need for a diversified housing stock
- Housing rehabilitation
- Rent control
- Affordable, accessible housing
- Workforce housing
- Counseling services
- Medical and health services
- Food pantry
- Consistency in services
- Life skills and educational services
- Critical services in one location
- No strings-attached housing and food security
- Conversion of existing structures to housing
- Hotel/motel conversion to replace condemned public housing
- Higher paying employment opportunities
- Lack of access to transportation
- Correction of eviction status
- Assistance to subsidize costs of insurance and taxes, specifically for the elderly

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. See attached Appendix III for comments received and responded to during the planning process.

Needs Assessment and Gaps Analysis

Despite having 24 Emergency Shelters and 18 Transitional Housing projects within the Continuum of Care (CoC) region, according to the 2022 Point In Time (PIT) Count in January 2022, a total of 288 individuals experienced homelessness on this specific night with 20% (58 individuals) being unsheltered. Ending homelessness requires multifaceted solutions that are strategic, and data driven. 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.

Gathering accurate data is critical to effective planning and performance management toward the goal of ending homelessness. Data can be used to predict, prevent, and possibly end housing stability or loss for the homeless and other qualifying populations. Having an accurate account of the homeless population and the ability to track patterns of services, provides the county and its housing partners with greater insight into the particular needs of the homeless and other qualifying populations.

In order to accurately represent the needs of Seminole County's qualifying populations, the county 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 county 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 county 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 both for families with children and adult-only households. However, the data also revealed that out of a total of 63,989 rental units in the county, there are 2,446 units affordable to households at or below 50% of the Area Median Income (AMI) and only 569 of those units are affordable to households at risk of homelessness (households at or below 30% AMI).

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	146	N/A	202	N/A	18								
Transitional Housing	27	N/A	62	N/A	0								
Permanent Supportive Housing	36	N/A	47	N/A	0								
Other Permanent Housing	0	N/A	0	N/A	0								
Sheltered Homeless						52	178	29	26				
Unsheltered Homeless						0	58	10	0				
Current Gap										+157	N/A	+133	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	63,989		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	569		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,877		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		3,615	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,845	
Current Gaps			-5,014

Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS); 3. Seminole County 2020-2024 Consolidated Plan Tables 8, 28, and 31.

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 in January 2022, a total of 288 individuals experienced homelessness on this specific night with 20% (58 individuals) being unsheltered. The majority (67% or 194 individuals) of the homeless population identified as being male. Thirteen percent (38) identified as Hispanic/Latino in ethnicity, where 53% identified as white and 42% identified as being black in regard to race. Thirty-five percent (102 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.

Single Adults

The majority of the homeless population within Seminole County are single adults without children. As of the 2022 PIT count data, there were 236 individual adults identified as homeless, 20 of them being young adults between the ages of 18-24 while the other 216 were over 24 years of age. The gender makeup included 25% female, 75% male, and less than 1% (1 person) identifying as transgender. A total of 14% identified as Hispanic/Latino. The racial breakdown of this population included 55% white, 42% black, and less than 3% identifying with multiple races. Chronic homelessness was the highest among single adults, with 80 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 17 households on the PIT night. The average family size for those experiencing homelessness among this group is 3 individuals. There were 34 children under the age of 18 in these households, 2 people between the ages of 18-24, and 16 people over the age of 24. A total of 65% of individuals in these households were female, while the remaining 35% were male. Five individuals, 10%, identified as Hispanic/Latino regarding ethnicity. The racial breakdown of these households shows that 46% identify as Black/African American, 44% identify as White, and 6% identified with multiple races. There were 5 households totaling 22 people who met the criteria for being considered chronically homeless, meaning 42% of families experiencing homelessness on the night of the PIT were chronically homeless.

Youth Homelessness

According to the 2022 PIT data, there were 19 youth between the ages of 18 to 24 living on their own, 2 of whom were living in unsheltered situations. The majority, 58% identified as male. Seven females were identified as homeless and one person identifying as transgender. There were 4 individuals (21%) identifying as Hispanic/Latino. The predominant race among unaccompanied youth is Black/African American with 58% (11 individuals) making up this demographic. Seven (37%) individuals identified as White. Two unaccompanied youth between the ages of 18-24 years old reported being chronically homeless. There were a total of 2 households headed by parenting youth between ages 18-24 with a total of 3 minors among these households, neither of which were experiencing chronic homelessness.

Veteran Homelessness

There was a total of 39 homeless veterans with 28 in emergency shelter, 1 in transitional housing, and 10 unsheltered. There were no families with children where the head of household identified as a veteran. Less than 8% of veterans identified as Hispanic/Latino in ethnicity and 62% identified as white, and 36% identified as black in race. Twenty veterans were considered chronically homeless, 6 of which were unsheltered.

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

As of the 2021 Emergency Rental Assistance Program Treasury Demographic Report, a total of 2,316 households were assisted in Seminole 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 \$11,010 was spent to prevent homelessness per household by either covering costs related to rental assistance or arrears, and utilities assistance or arrears. 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 1,064 Seminole 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 26 people were survivors of domestic violence. According to the county's 2020-2024 Consolidated Plan, in 2019, FDLE reports show Seminole County reported 1,250 arrests among domestic violence offences. They include murder, rape, aggravated assault, simple assault, and intimidation. The 2019 Point in Time Count identified 151 homelessness victims of domestic violence. At the time of the report, the point in time count was the only source of data available regarding homeless domestic violence survivors.

- ***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.***

- *Other Families Requiring Services/Housing Assistance to Prevent Homelessness -*

In accordance with the HUD Notice, this population is defined as households (i.e., individuals and families) who have previously been qualified as “homeless”, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

According to the county’s most recent Consolidated Plan, there are 1,877 rental units affordable to households at 50% AMI and 3,845 total renter households at 30%-50% AMI with one or more severe housing problems. This indicates a lack of suitable affordable rental housing and suggests many renters are living in unsafe and/or unsanitary conditions. Data is limited, but there is a correlation that suggests low-income individuals and families lacking a suitable living environment may have experienced homelessness at one point. These households are vulnerable to housing instability and could return to homelessness without assistance.

Table 1 above, Homeless Needs Inventory and Gap Analysis, also indicates the county has 285 sheltered homeless through emergency shelters, transitional housing, or permanent supportive housing. Those individuals and families currently housed in emergency shelters or through transitional housing are vulnerable to returning to homelessness without additional housing assistance or supportive services.

- *At Greatest Risk of Housing Instability -*

In accordance with the HUD Notice, this population is defined as: 1) households having annual income that is less than or equal to 30% of the area median income and experiencing severe cost burden; or 2) having annual income that is less than or equal to 50% of the area median income and meets at least one condition of the definition of “At Risk of Homelessness”, including living in housing that has characteristics associated with instability and an increased risk of homelessness or living in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room.

According to the county’s most recent Consolidated Plan, there are 3,622 severely cost-burdened households (30% AMI) and 3,782 cost-burdened households (50% AMI), putting these households at risk of housing instability. There are 569 rental

units affordable to households at 30% AMI (At-Risk of Homelessness) and 3,615 total renter households at 0-30% AMI with one or more severe housing problems.

In addition, data from the Consolidated Plan indicates that 9,744 of all households in Seminole County experienced at least one of the four severe housing problems. Data for Seminole County shows the following housing problems ranked in descending order:

- Housing cost burden greater than 50% of income (and none of the above problems): 19,407
 - Housing cost burden greater than 30% of income (and none of the above problems): 15,133
 - Zero/negative Income (and none of the above problems): 2,004
 - Overcrowded - With 1.01-1.5 people per room (and none of the above problems): 625
 - Substandard Housing: 472
 - Severely Overcrowded >1.51 people per room (and complete kitchen and plumbing): 233
- *Elderly with Disabilities –*

According to the county's 2020-2024 Consolidated Plan, Seminole County has 67,463 persons at or above the age of 65, representing 14% of the county population. Of the total elderly population, 7,990 also have a disability. Approximately 14,676 Seminole County elders live below the federal poverty level. There are 4,992 households in the county with at least one-person age 60 years or older receiving Food Stamps/SNAP benefits. There are 38,558 housing units occupied by persons 65 years and older. Approximately 12.2% are renters.

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 366 emergency shelter beds were available to the community, none of these shelter beds were considered non-congregate. According to the 2022 PIT count, 197 of the 366 year-round beds were utilized showing a shelter utilization rate of 54%. 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.

Supportive Services

Throughout the direct consultations with local organizations serving those nearing or experiencing homelessness, there was a 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 for care navigation and intensive case management services for permanent supportive housing programs. Mentioned during every stakeholder engagement interview was the difficulty in locating affordable housing suitable for the qualifying populations.

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. Seminole County Housing Authority administers over 600 vouchers. The need for rental assistance far exceeds PHA's capacity as there are 40,140 low-income (0-80% AMI) cost-burdened renters (10,395 extremely low-income, 11,095 low-income, and 18,650 moderate-income). Cost-burdened renters include 15,187 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 4,979 elderly low and very low income renter households that are cost-burdened. 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 only 83 slots for Permanent Supportive Housing. Again, upon the most recent PIT count night, there were at least 102 individuals on that night experiencing chronic homelessness and needing permanent supportive housing who were not yet housed. This illustrates, at a minimum, a gap of 19 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 569 units currently dedicated to this group and an additional need of 3,046 units dedicated to this income range. According to the same table, the number of units dedicated to those households earning between 30-50% AMI is 1,877 with an additional gap of 1,968 units. There is a severe lack of existing units of affordable housing available to ELI and VLI households.

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 case management assisting with navigating and sustaining permanent housing options; 3) lack of resources supporting long term rental subsidies for those below 30% AMI.

- ***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) vouchers and TBRA programs providing long-term rental subsidies; 3) landlord incentives to keep tenants and lower rents.

- ***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 domestic violence and sexual exploitation situations include: 1) emergency shelter and transitional housing capacity to provide services to persons fleeing domestic violence (Florida Department of Children and Families 2019-2020 Annual Capital Needs Assessment); 2) essential services including survivor focused safety plans, counseling and advocacy, information and referrals for persons seeking assistance, child and youth-specific activities, youth-targeted education, and education and training for adults (The Florida Coalition Against Domestic Violence).

- ***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.***

Cost burden is the primary issue to housing stability for “other populations” and the unmet needs include: 1) lack of affordable housing; and 2) access to support services to promote housing stability. In addition, elderly with disabilities, who the county has included in the definition of “other populations”, typically have limited, fixed incomes not high enough to

accommodate the increased rates in the rental market and needs associated with living independently and aging in place. The primary unmet needs for this population include: 1) rental assistance; 2) support staff providing some in-home support and health care services; and 3) availability of affordable assisted living facility placements for those 30% AMI and below.

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

The County is a recipient of Emergency Solutions Grant (ESG) funding and allocates funds on an annual basis to local nonprofit organizations to support the housing crisis response system through emergency shelter operations and maintenance activities. The Seminole County Community Services Department also allocates funding for rapid rehousing for families who are homeless within the county limits.

There are a variety of services that homeless persons could access through the Seminole County Health Department including clinical and nutrition services, wellness programs, and infectious disease services. In addition, the Seminole County School Board's Families in Need (FIN) Program targets students experiencing homelessness and their families. This program is designed to attain a steady living environment for the family and can include a variety of services and referrals to needed services such as employment services and remove educational barriers for the student through access to their public education. Persons with HIV can access services through the Seminole County Health Department, including testing, prevention education, and assistance programs for those with HIV/AIDS.

By providing direct funding to local non-profit agencies whose expertise is focused on supportive services and housing for persons experiencing homelessness, the County can ensure that the families and individuals benefitting from the activities are the most in need of the services. The county has found that it is beneficial to partner with non-profit homeless service providers to ensure that the funds are being spent efficiently and in accordance with nationally recognized best practices. The Seminole County Community Services Department, supplementing the work of local direct service providers, provides direct supportive services to the persons with special needs who reside in the county through internal programs. Persons with special needs can access an array of services either through the county or a community-based organization, centered around their need, which is a strength.

The County also partners with the Florida Department of Health to carry out public services for low-income, special needs, and homeless populations. Seminole County has funded Health Department programs with general fund dollars including a dental program, food pantry, mobile clinics, and youth programs. The Health Department has also received Community Development Block Grant funds for diabetes testing and wellness programs.

Although the delivery system in the county features significant investment and service options, in 2010 a collaborative effort by homeless stakeholders within Seminole County, known as Community Conversation on Homelessness (CCoH), outlined a set of strategies to address gaps in the shelter and housing inventory and service delivery system. Strategies were intended to address the following gaps:

1. Lack of a coordinated system.

Strategy: Support regional efforts to develop a coordinated referral, communication and service provision.

A) Support regional efforts to create and mature a centralized, common database.

- i. Communicate local requirements to connect a community continuum of care.
- ii. Assist in the development of a glossary of common terms.

B) Increase and coordinate Case Management services.

- i. Create a common definition for case management, including levels of case management.
- ii. Create a common intake process that is comprehensive and leads to better outcomes.
- iii. Identify current case-management services offered in the community; analyze needs and gaps.
- iv. Utilize standardized case-management models, common vocabulary and competencies.
- v. Consider clients and peers in developing case management processes.

2. Services unaligned to meet emerging homelessness requirements.

Strategy: Align services to meet emerging homelessness requirements.

- A) Deliver solutions that address critical services and gaps in transportation, child care, mental health and employment.
- B) Continue to develop services for children that build upon the successes achieved by Seminole County Service providers.
- C) Create decision support tools to match needs with availability.
- D) Determine funding, clients and resources.

3. Lack of a formal housing plan.

Strategy: Continue to improve a formal housing plan that attends to regional, state and federal frameworks to close identified housing gaps that hinder continuum of care goals.

- A) Continue to elaborate on multi-year and tactical plans to secure affordable rental housing for the homeless and precariously housed.
- B) Work with municipalities and the private sector to gain consensus, support and active participation in delivering collaborative housing strategies that integrate well with growth management plans of participating municipalities and Seminole County Government.
- C) Leverage innovative housing design/construction and land development processes to lower costs and improve performance of transitional, rental and/or purchased housing to reduce homelessness.
- D) Identify community needs for housing services (needs assessment) and gaps in availability (gaps analyses).
- E) Define and design the ongoing ability to determine capacity.

4. Lack of oversight and monitoring.

Strategy: Develop a governance structure to support systems improvement, monitor their progress, and continually evaluate their effectiveness.

- A) Expand key stakeholder participation (e.g., businesses, hospitals, educational institutions, the homeless) to represent diverse views and deliver successful solutions.
- B) Develop evaluation metrics and performance management processes.
- C) Develop engagement strategies to inform all stakeholders.
- D) Aggregate subgroup funding needs into total financial requirements; build Business Cases for funding.
 - i. Develop a prioritization matrix to help ensure critical issues are addressed in a timely manner.
 - ii. Develop engagement strategies to educate all stakeholders about the plight of the homeless in Seminole County as well as actions and strategies underway to help the homeless attain self-sufficiency.

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:

To further refine “other populations”, the county has opted to include elderly with disabilities within the definition. Through direct consultation, stakeholders provided feedback indicating they are seeing a rise in the number of senior citizens with disabilities fall into homelessness due to the increased rental rates and lack of accessible units. This group typically lives off limited fixed incomes and have limited natural support networks. Data and input suggest that in some cases these individuals would fall into the “at risk of homelessness category”.

Identify priority needs for qualifying populations:

Priority needs identified for all qualifying populations combined, are: 1) affordable rental housing options; 2) supportive services; 3) case management for housing sustainability; 4) housing location services; and 4) rental assistance.

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

The priority needs specific to those meeting the homeless definition established in 24 CFR 91.5 include access to affordable housing, case management support services, and housing location services.

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

Priority needs identified among those at risk of homelessness include access to affordable rental units, as well as access to financial assistance and increased access to rental programs such as Tenant-Based Rental Assistance (TBRA) and Housing Choice Vouchers, access to childcare, and stronger relationships with affordable housing landlords.

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

The priority needs for those fleeing domestic violence and sexual exploitation situations include: 1) emergency shelter and transitional housing capacity to provide services to persons fleeing domestic violence; and 2) essential services including survivor focused safety plans, counseling and advocacy, information and referrals for persons seeking assistance, child and youth-specific activities, youth-targeted education, and education and training for adults.

- ***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***

Priority needs identified for the other populations, as described in this plan, include access to affordable rental housing, rental subsidies, case management, and in home health care services.

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 conducted. The county reviewed data presented in this plan, considered community input, and analyzed information presented through other relevant resources, such as local planning documents and census data. A multimethod

approach to research was necessary for this process to balance out the limitations of each method. Combining qualitative and quantitative approaches to data analysis provides stronger evidence and more confidence in our findings. Level of need and gaps were determined through:

Needs Assessment and Gaps Analysis

The county 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 Seminole County, including the number of sheltered and unsheltered homeless, whether there was a need for beds, and/or a need for affordable units. Findings identified a surplus of family and single adult beds in the homeless service system, but determined there is a significant gap in access to affordable rental housing, primarily for the extremely-low- income, and very low-income categories, which are most at-risk for homelessness.

In addition, the plan describes the size and demographics composition of qualifying populations in Seminole County, which is imperative to know when determining priority needs. 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. The survey provides a good amount of statistical power and allowed the county to ask specific questions that help determine unmet need and funding priorities. Survey results were able to provide guidance on which eligible activities are thought to effectively decrease homelessness best and benefit qualifying populations the most. Results were incorporated into the plan and informed the use of HOME-ARP funds.

Direct Consultation

Consultation with stakeholders promotes collaborative planning and helps with data accuracy. Hearing directly from providers serving the county's qualifying populations allowed the county to analyze data from a first-hand perspective. Through this lens, priority needs that would otherwise be overlooked, were brought to the attention of the county.

Review of Available Resources and Current Programs

To strengthen impact of funds and reduce duplication of benefits, it is necessary to consider existing resources (local, state, and federal) and current programs. A review of this information helped to determine: 1) actual unmet needs of qualifying populations and what gaps exists; 2) sub-categories of qualifying populations, if any, that are high-risk or have greater needs; 3) which eligible HOME-ARP activities will better address unmet needs of qualifying populations; 4) how much funding is needed to address those unmet needs; and 5) how to effectively leverage resources.

Assessment of Organizational Capacity

To ensure successful implementation of HOME-ARP activities the county performed a high-level assessment of local service providers organizational capacity. This helped determine service gaps, staffing needs, and the ability of local providers to manage the delivery of additional services that would come with increased funding. Many organizations serving qualifying populations stated that they have experienced and increased need for operational funds and have a lack of funding to administer increased programs and services. There are very strong service providers in the county who collaborate and leverage funding and service opportunities to the best of their ability.

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 county 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 county will use either: 1) small purchase procedures; 2) sealed bids; 3) or competitive proposals.

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

1. The county releases the NOFA, which identifies the amount of available funding, eligible activities, location, and deadline for applicants to submit proposals.
2. The county hosts mandatory technical assistance workshops to provide guidelines and answer questions related to the NOFA.
3. Seminole County Community Services, Community Development Division staff score and vet applications/proposals and determine funding recommendations based on established selection criteria.

If the county determines the use of a sub-recipient is necessary to carry out any of its HOME-ARP programs or activities, at its discretion, the county may designate a qualified and responsible entity to this role or solicit proposals from multiple organizations. The county 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 county's Community Services Department, Community Development Division, intends to remain the lead agency responsible for the administration of its HOME-ARP allocation and related eligible activities. The county may determine it is necessary to designate a sub-recipient(s) to carry out some HOME-ARP activities. In this case, the county will solicit proposals from qualified applicants. Sub-recipients will be obligated to comply with all federal regulations pertaining to the HOME and HOME-ARP programs, but ultimately the Community Services Department, Community Development Division, 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 county will not pre-award any portion of its HOME-ARP administrative funds to a subrecipient 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	\$ 300,000		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 2,137,151.30		
Non-Profit Operating	\$ 152,321	5 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 456,965.70	15 %	15%
Total HOME ARP Allocation	\$ 3,046,438		

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

The activities selected for funding directly align with the county's findings from the needs assessment and gap analysis in the following ways:

- 1) Table 1 - Homeless Needs Inventory and Gap Analysis, showed that there is a surplus of shelter beds of 157 for families and 133 for adults. According to the PIT count in 2022, there was a lower utilization rate at shelters that can be attributed to social distancing due

to COVID-19. The data represented in Table 1 of the Needs Assessment and Gaps Analysis indicates that increasing beds within emergency shelters is not a high priority.

- 2) Table 2 – Non-Homeless Needs Inventory and Gap Analysis, shows a significant gap in available affordable units at -5,014. This data suggests that the ongoing recovery out of COVID-19 conditions has shifted to access to affordable housing as a priority need. The county has the beds to shelter the homeless and other qualifying populations, but the challenge is now upward mobility into transitional or permanent housing solutions. This data supports the determination that there is a high need for access to affordable rental units.
- 3) Through FHC Connect community engagement the county was able to get a better understanding of the homeless profile, housing and service delivery unmet needs, and priority needs of qualify populations. Results revealed access to affordable units as the top priority, followed by supportive services. Community input also identified non-profit operating expenses as a need, particularly to offset the costs of increased or expanded services.
- 4) Stakeholder consultations also revealed patterns of unmet need. The county met with over 10 organizations that provide services to qualifying populations and each mentioned access to affordable housing as a high need. In addition, there was a 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 for care navigation and intensive case management services for permanent supportive housing programs.
- 5) Review of local planning documents, including the 2020-2024 Consolidated Plan, the Local Housing Assistance Plan, the Comprehensive Plan Housing Element, and Attainable Housing Strategic Plan, also revealed data, goals, and objectives that consistently aligned with the need for access to affordable housing, both rental and homeownership. Each plan outlined its own set of programs, activities, and/or strategies for how to achieve the county's affordable housing goals, all of which can be coordinated with the HOME-ARP activities selected in this plan.

As a result of findings through the Needs Assessment and Gaps Analysis, the county will allocate its HOME-ARP funds towards eligible activities in the following manner: 1) Supportive Services – 10%; 2) Development of Affordable Rental Housing – 70%; 3) Non-Profit Operating – 5%; and 4) Grant Administration – 15%.

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 Seminole County, it is imperative to consider existing resources available to qualifying populations. This includes looking at the existing inventory of housing and shelters and determining what the homeless profile looks like within the county. Currently, data indicates the county has adequate shelter resources with a surplus of 157 beds for families and 133 beds for adults.

Upon the most recent homeless housing inventory completed by the CoC in January 2022, a total of 366 emergency shelter beds were available to the community, none of these shelter beds were considered non-congregate. According to the 2022 PIT count, 197 of the 366 year-round beds were utilized showing a shelter utilization rate of 54%. 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.

At any given time, family beds may be at maximum utilization and a wait list is maintained. However, even with that information, based on the characteristics above and the shelter resources available, there is not an identifiable need for shelter expansion.

Further, analysis of gaps in the housing inventory and service delivery system revealed availability of affordable units, availability of services, and lack of funding for increased services as barriers to reducing homelessness. In addition, lengthy wait list for public housing units and vouchers exacerbates homelessness and continues to put vulnerable populations at-risk, as well as limited access to transportation.

The data mentioned above along with feedback received during the consultation process provided the rationale to fund the eligible activities of supportive services, development of affordable rental housing, and non-profit operating expenses. The county's strategy is to increase access to affordable rental units and pair housing activities with supportive services to create a coordinated approach to reducing homelessness. In addition to meeting the immediate housing and service needs of its qualifying populations, the county's approach: 1) supports upward mobility out of shelters by providing transitional and permanent housing options to vulnerable residents 2) increases availability of essential services necessary to sustain housing stability; 3) supports key non-profit partners providing critical services; 4) diversifies the housing stock; 5) supports equitable development; and 6) promotes consistency with Consolidated Plan, Comprehensive Plan, and Attainable Housing Strategic 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 county has dedicated \$2,137,151.30 of its HOME-ARP allocation towards the development of affordable rental housing and proposes to create approximately 10 units through acquisition, rehabilitation, and/or new construction activities. The intention is to utilize all units to provide housing for 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 labor and materials and is subject to change with the market. The county 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 county understands that reducing homelessness is reliant upon strategically pairing eligible activities that promote housing stability for its qualifying populations. As a direct result of findings from the Needs Assessment and Gaps Analysis, it was determined that two components were essential to meeting the unmet needs of the county's homeless, including increasing the availability of affordable units and providing supportive services. The county's strategy is to increase availability of housing units for its most vulnerable populations by creating affordable housing through rehabilitation, re-development, or new construction activities. This 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 county.

The county's approach to producing affordable units will include coordinating cross-departmentally and with its housing partners to inventory vacant/abandoned properties within county limits. The county will conduct an analysis to determine suitability for rehabilitation and consider acquisition and rehabilitation costs in an inflated market. In situations where rehabilitation of the existing structure is not cost effective, the county may determine that demolition, redevelopment, or new construction is necessary. The county will use existing market analyses to determine the most cost-effective method for increasing the availability of rental units for its qualifying populations with the intention of maximizing the number of affordable units created.

The county will consider diverse housing options when carrying out its rental development activities including single-family and multi-family structures. The county recently passed an ordinance allowing for accessory dwelling units therefore, this type of housing will also be

considered to maximize the number of units created. The county will also leverage its current Tenant-Based Rental Assistance (TBRA) dollars to provide additional subsidy, lowering rental costs further.

The county will coordinate with the Planning Division, local housing partners, and internal legal team in the drafting of policies and procedures for carrying out the HOME-ARP rental development activity and for reaching production goals.

The county's rental development goals will provide a significant benefit to qualifying populations and address the priority needs identified in this plan in the following ways:

- Increases availability of affordable transitional or permanent housing options for qualifying populations.
- Paired with supportive service activities, it provides housing stability and promotes upward mobility for those in shelters.
- Supports and sustains long-term affordability.
- Preserves the county's existing affordable housing stock.
- Eliminates slum and blighted conditions.
- Diversifies the county's housing stock supporting fair housing choice.
- Supports equitable development throughout the county.
- Leverages existing resources to further reduce rental costs and offset inflation.
- Revitalizes county neighborhoods.

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 county will not give preference to one or more qualifying populations or a subpopulation due to the high demand for access to affordable housing and services for all vulnerable qualifying populations. Not giving preference allows the county to address immediate needs as they arise.

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.

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 county will not 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 county 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.

