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Georgia Department of Community Affairs Housing Finance & Development Division

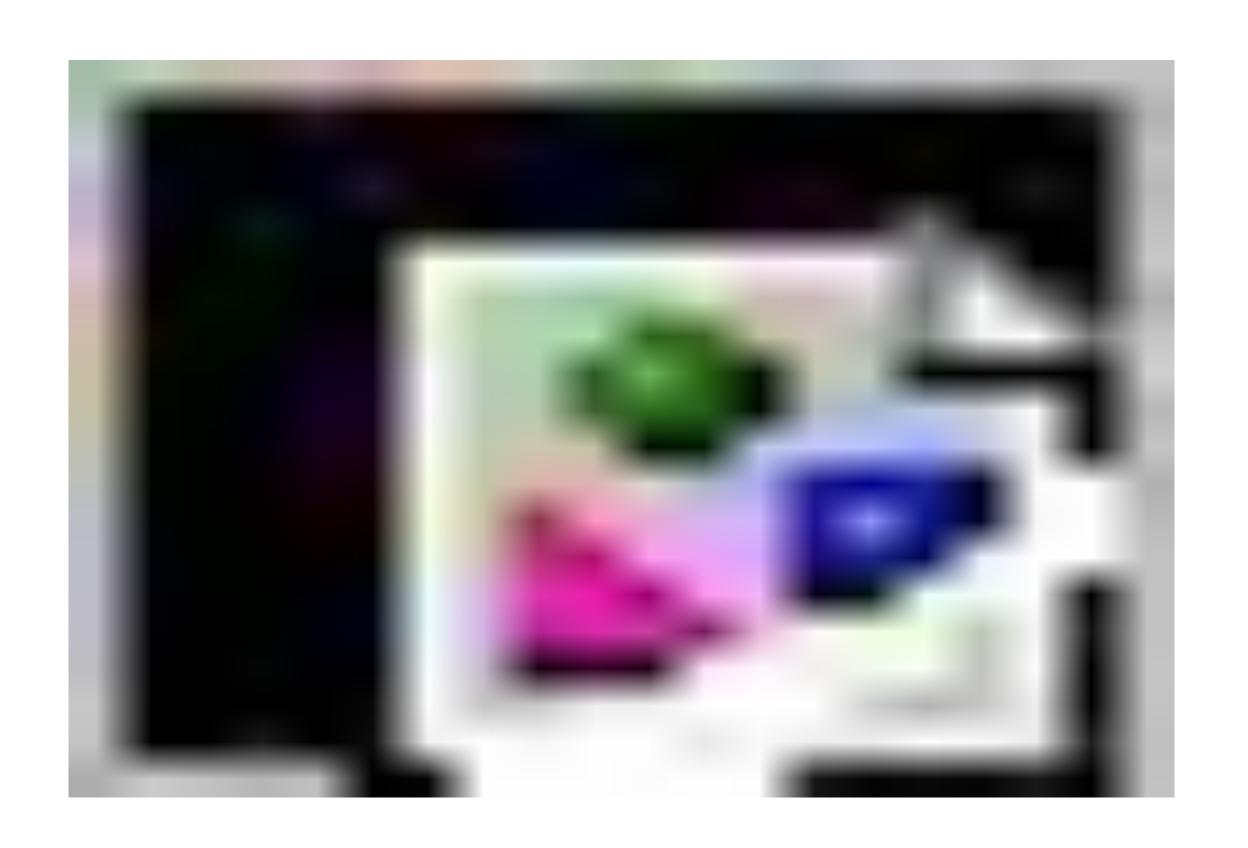
HOMELARP

"HOME for the Homeless"

\$87 MIM
Through 2030

Georgia Dept. of Communities Affairs Housing Finance & Development Division

HOMEARP@dca.ga.gov



What is HOME-ARP?

New program funded with the:

American Rescue Plan

\$ 1.9 Trillion enacted in March 2021 Provides \$5 Billion in HOME nationwide for activities to be funded through 2030

HUD HOME Investment Partnership Program

Housing Construction, Down Payment Assistance, Rental Assistance

HUD McKinney Vento Programs

Homeless Shelter, Supportive Services, Rental Assistance

HOME-ARP Allocations in Georgia

\$137 MM Total

Albany	\$ 1,798,393
Athens	\$ 2,506,309
Atlanta	\$ 7,991,553
Augusta	\$ 3,483,201
Clayton County	\$ 3,929,129
Cobb County	\$ 5,551,090
Columbus	\$ 5,551,909
Dekalb County	\$ 7,800,770
Fulton County	\$ 2,428,588
Georgia	\$ 87,655,165
Gwinnett County	\$ 2,428,588
Macon	\$ 2,987,467
Savannah	\$ 3,100,743



Qualifying Populations

Those who are:

- Homeless
- At risk of homelessness
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking
- Other households requiring services or housing assistance to prevent homelessness but do not otherwise qualify under the other categories

Eligible Activities

- Develop affordable rental housing
- Acquisition and development of non-congregate shelter units (NCS)
- Tenant-based rental assistance (TBRA)
- Supportive services
- 15% for Administrative Costs
- 5% for operating assistance to nonprofits carrying out HOME-ARP activities

Budget Scenario

Activity	Percent	Total	Annually
15% Admin	15%	\$ 13,050,000	\$ 1,864,300 (2023-2030)
5% Nonprofits	5%	\$ 4,350,000	\$ 621,500 (2023-2030)
Rental Dev	20%	\$ 17,400,000	\$ 3,480,000 (2023- <u>2028</u>)
Non-Congregate Housing	20%	\$ 17,400,000	\$ 3,480,000 (2023- <u>2028</u>)
TBRA	20%	\$ 17,400,000	\$ 2,485,700 (2023-2030)
Supportive Services	20%	\$ 17,400,000	\$ 2,485,700 (2023-2030)
Total	100%	\$ 87,000,000	

Allocation Plan

The State of Georgia must develop a HOME-ARP allocation plan including engaging in public participation and consultation

The allocation plan must describe how the State intends to:

- Distribute HOME-ARP funds
- Address the needs of HOME-ARP qualifying populations.

The State must consult with:

- Agencies and service providers whose clientele include HOME-ARP qualifying populations
- Continuums of Care organizations
- Homeless service providers
- Domestic violence service providers
- Veterans groups
- Public housing agencies
 - Organizations that address fair housing, civil rights, and the needs of persons with disabilities

Proposed Allocation Plan Schedule

Activity	Target Date
Hold stakeholder forums	Dec-Feb 2021-2022
Write Allocation Plan	Jan-Feb 2022
Include 2022 Homeless Point in Time data in plan	Late February
Public comment period and hearing	March 1-15, 2022
Submit Allocation Plan to HUD	March 15, 2022
Potential start date	May 1, 2022

Georgia HOME-ARP Online

Website

Email Address: <u>HOMEARP@dca.ga.gov</u>

ListServe (to be developed by 11/30)

- Sign up for news about upcoming Stakeholders Forums
- Fill out the priorities survey (to be developed by 11/30)
- Opportunity for input
- Notification on program updates



Any questions?

Email HOMEARP@dca.ga.gov

Visit us online at **GA DCA HOME ARP Program**

Following Sides are from

HUD HOME ARP Fact Sheets

HOME-ARP Allocation Plan Template

Guidance

- To receive its HOME-ARP allocation, a PJ must:
 - Engage in consultation with at least the required organizations;
 - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an
 attachment next to the "HOME-ARP allocation plan" option on either the AD-26 screen (for
 PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25
 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is
 part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further Fair Housing;
 - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - Anti-Lobbying;
 - Authority of Jurisdiction;
 - Section 3; and,
 - HOME-ARP specific certification.

Participating Jurisdiction: Enter name of PJ.

Date: Click to enter a date.

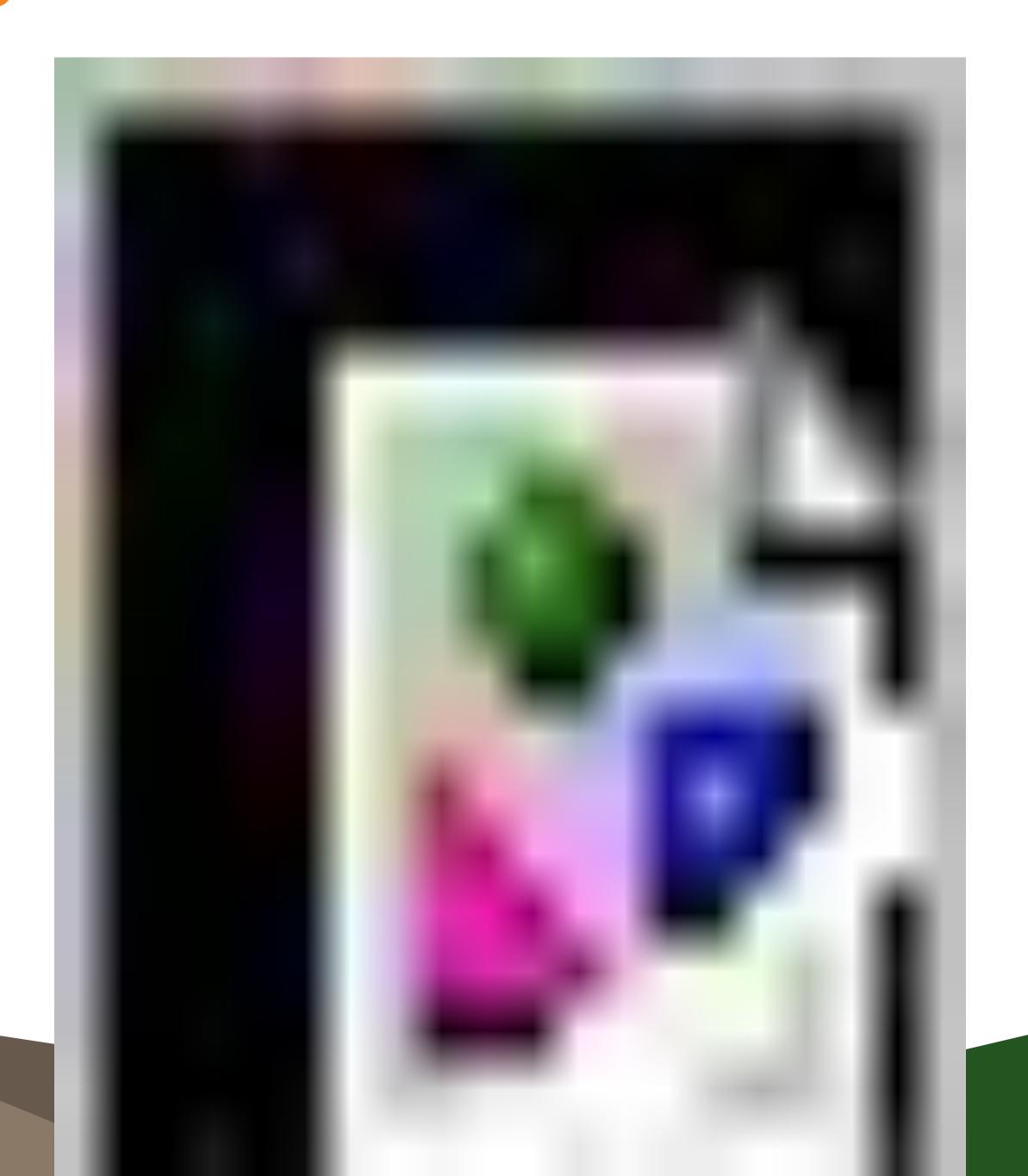
Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state's boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

Enter narrative response here.

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



- Public comment period: start date Click or tap to enter a date. end date Click or tap to
 enter a date.
- Public hearing: Click or tap to enter a date.

Enter narrative response here.

Describe any efforts to broaden public participation:

Enter narrative response here.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

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

Enter narrative response here.

Summarize any comments or recommendations not accepted and state the reasons why: Enter narrative response here.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

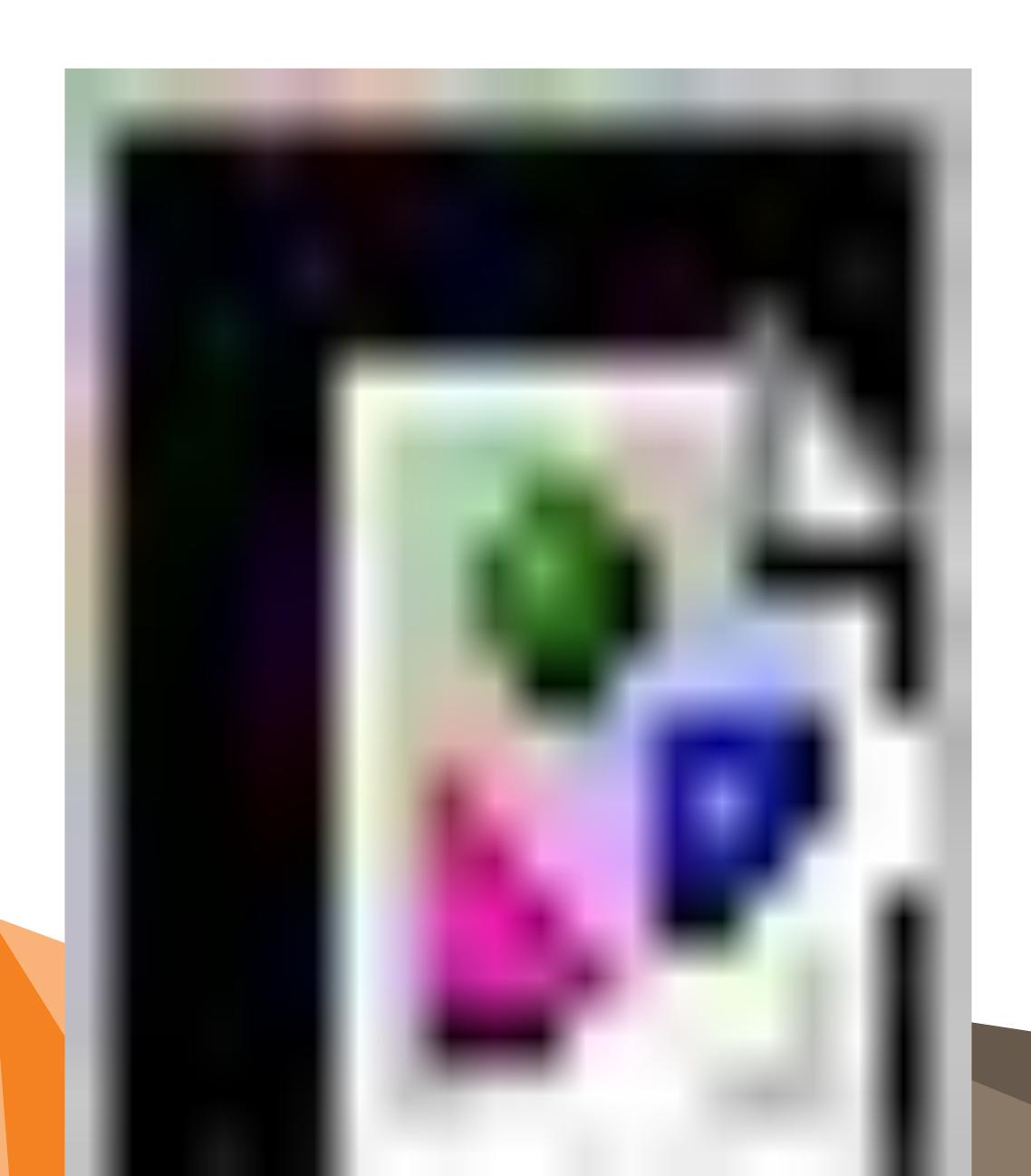
	-				H	lomeless	,						
		Curr	ent Inve	ntory		Н	om eless	Populat	ion		Gap A	nalysis	
	Far	nily	Adult	s Only	Vets	Family	Adult		Latin u	Far	nily	Adult	s Only
	# of Beds	# of Units	# of Beds	# of Units	# of Beds	HH (at least 1 child)	HH (w/o child)	Vets	Victims of DV	# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	#	#	#	#	#								
Transitional Housing	#	#	#	#	#								
Permanent Supportive Housing	#	#	#	#	#								
Other Permanent Housing						#	#	#	#				
Sheltered Homeless						#	#	#	#				
Unsheltered Homeless						#	#	#	#				
Current Gap										#	#	#	#

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

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless						
	Current Inventory	Level of Need	Gap Analysis			
	# of Units	# of Households	# of Households			
Total Rental Units	#					
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	#					
Rental Units Affordable to HH at 50% AMI (Other Populations)	#					
0%-30% AMI Renter HH w/1 or more severe housing problems (At-Risk of Homelessness)		#				
30%-50% AMI Renter HH w/1 or more severe housing problems (Other Populations)		#				
Current Gaps			#			

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



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:

Enter narrative response here.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit	
Supportive Services	\$ #			
Acquisition and Development of Non- Congregate Shelters	\$#			
Tenant Based Rental Assistance (TBRA)	\$ #			
Development of Affordable Rental Housing	\$ #			
Non-Profit Operating	\$ #	# %	5%	
Non-Profit Capacity Building	\$ #	# %	5%	
Administration and Planning	\$#	# %	15%	
Total HOME ARP Allocation	\$#			

Additional narrative, if applicable:

Enter narrative response here.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

Enter narrative response here.

HOME-ARP Production Housing Goals

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

Enter narrative response here.

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:

Enter narrative response here.

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:

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

Enter narrative response here.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Enter narrative response here.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

Enter narrative response here.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under with the PJ will refinance existing debt for a HOME-ARP rental project, including:

• Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity

Enter narrative response here.

 Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.

Enter narrative response here.

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

Enter narrative response here.

- Specify the required compliance period, whether it is the minimum 15 years or longer.
 Enter narrative response here.
- State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
 Enter narrative response here.
- Other requirements in the PJ's guidelines, if applicable: Enter narrative response here.

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- Private units or rooms
- Temporary shelter
- Does not require occupants to sign a lease or occupancy agreement.

This activity may include:

- Construction of new structures
- Acquisition and/or rehabilitation of existing structures (such as motels, nursing homes, schools, churches, or other facilities)

Eligible Costs:

Acquisition Costs:

Costs to acquire improved or unimproved real property for use as or development of HOME-ARP NCS

Demolition Costs:

Costs to demolish existing structures for the purpose of developing HOME-ARP NCS

Development Hard Costs:

Costs to rehabilitate or construct HOME-ARP NCS units to meet the HOME-ARP minimum habitability standards. Costs to make improvements to the project site, including installation of utilities or utility connections, laundry facilities, community facilities, on-site management, or supportive service offices

Related Soft Costs:

Reasonable and necessary costs incurred by the PJ, subrecipient, or project owner associated with financing, acquisition, and development of HOME-ARP NCS projects

Replacement Reserve:

Costs to capitalize a replacement reserve to cover reasonable and necessary costs of replacing major systems and their components such as roof repair, HVAC repair, etc.

Ineligible Costs:

- HOME-ARP funds may not be used to pay ongoing costs of operating HOME-ARP NCS or to convert NCS to housing.
- Project Sponsors will need to pay for operating expenses

Admission and Occupancy:

HOME-ARP NCS units may only be occupied by individuals or families that meet the criteria for one or more of the Qualifying Populations.

Program participants may not be charged occupancy fees or other charges to occupy a HOME-ARP NCS unit unless the PJ determines such fees and charges are customary and reasonable and the charges comply with 24 CFR 578.77(b).

PJs are encouraged to incorporate HOME-ARP NCS units into the Coordinated Entry (CE) established by the Continuums of Care (CoC)(s) for the area the NCS is funded to serve, if the CE complies with the requirements established in the HOME-ARP Notice.

HOME-ARP supportive services may also be provided, if needed, to Qualifying Populations served by the NCS.

Project Requirements:

Property and Habitability Standards:

At project completion, HOME-ARP NCS units and common areas must meet all applicable State and local codes, ordinances, and requirements and HUD's Lead Safe Housing Rules at 24 CFR Part 35.

Project classification as acquisition only, rehabilitation, or new construction is determined by the PJ's local code requirements based on specific work to be performed.

Projects must meet HOME-ARP NCS ongoing property standards throughout the restricted use period.

PJ Management and Oversight:

Project Development Due Diligence:

Before awarding HOME-ARP funds to a HOME-ARP NCS project, PJs must determine that acquisition and/or development is financially feasible. The PJ is responsible for maintaining continued operation of the NCS and must consider whether the HOME-ARP NCS project has secured or has a high likelihood of securing operating funding, because operating costs cannot be paid with HOME-ARP.

PJs must assess HOME-ARP NCS projects, including a review of information from the owner and/or developer that demonstrates the project's financial feasibility throughout the restricted use period.

Before committing funds, PJs should also determine whether the owner intends to continue operating the project as HOME-ARP NCS or emergency shelter NCS under ESG for the restricted use period or plans to convert the HOME-ARP NCS to housing after the minimum use period has been met. In such instances, the PJ should consider the physical design needs of an eventual conversion in its evaluation of the HOME-ARP NCS project.

Minimum Use Period:

All HOME-ARP NCS projects must be operated as NCS for a minimum period of time prior to conversion:

Acquisition Only: 3 years

Moderate Rehabilitation: 5 years if Total Investment < 75% Appraised Value Substantial Rehabilitation: 10 Years if Total Investment > 75% Appraised Value

New Construction 10 Years

Restricted Use Period:

Acquisition Only: 10 years Rehabilitation: 10 years

New Construction: 15 years

Use and Conversion of NCS:

Use as NCS:

The NCS may remain as HOME-ARP NCS for the restricted use period or may be used as NCS under the Emergency Shelter Grant (ESG) program.

Conversion to Housing:

No HOME-ARP funds may be used for conversion.

Conversion to Permanent Affordable Housing or CoC Permanent Housing:

After the HOME-ARP NCS minimum use period, but during the restricted use period:

A PJ may provide written approval to convert the project from HOME-ARP NCS to permanent affordable housing (e.g., affordable multifamily rental housing, transitional housing) in accordance with the requirements prescribed in the PJ's written agreement with the HOME-ARP NCS owner.

A PJ may permit conversion of a HOME-ARP NCS project to permanent housing under 24 CFR 578.43 (acquisition) and/or 24 CFR 578.45 (rehabilitation) of the CoC program regulations. Conversions must comply with any conversion requirements established in the PJ's written agreement with the HOME-ARP NCS owner. If conversion is planned, the HOME-ARP NCS use restrictions must remain in place until the project is approved for CoC funding and the required CoC restrictions are imposed on the property

Overview:

A PJ may use HOME-ARP funds to acquire, construct and rehabilitate rental housing for occupancy by individuals and families that meet one of the Qualifying Populations

HOME-ARP rental housing may include single family or multifamily housing, transitional or permanent housing, group homes, single room occupancy (SRO) units, and manufactured housing.

To promote the development of financially viable housing, PJs may pay the entire amount of eligible costs associated with HOME-ARP rental units, are encouraged to work with local PHAs and state or local agencies to obtain project-based rental assistance and may provide ongoing operating cost assistance or capitalize a project operating cost assistance reserve to address operating deficits of HOME-ARP units occupied by qualifying households.

To promote inclusion of HOME-ARP units in mixed-income housing, up to 30 percent of the units a PJ funds with its HOME-ARP grant may be restricted for occupancy by households that are low-income.

Eligible Activities and Costs:

- Eligible Activities: Acquisition, construction, and rehabilitation of affordable rental housing, including reconstruction as defined in 24 CFR 92.2. Acquisition of vacant land or demolition may be undertaken only with respect to a HOME-ARP project for which construction is expected to start within 12 months of commitment.
- Eligible Costs: HOME-ARP funds may pay for up to 100 percent of the following eligible costs associated with HOME-ARP rental units:
 - Development hard costs include the actual cost of constructing and rehabilitating housing to meet applicable property standards. Eligible development costs also include site improvements, utility connections and costs to construct or rehabilitate laundry and community facilities located within the same building as the HOME-ARP housing;
 - Refinancing of existing debt secured by a HOME-ARP rental project rehabilitated with HOME-ARP funds;
 - Acquisition costs of improved or unimproved real property;
 - Related soft costs including reasonable and necessary costs incurred by the PJ or project owner associated with the financing, development, acquisition, or rehabilitation of HOME-APR rental housing;
 - Relocation costs as defined in 24 CFR 92.206(f), 24 CFR 92.353, and the Notice;
 - © Certain costs related to the payment of construction, bridge, or guaranteed loans, if HOME-ARP is part of original financing; and Operating cost assistance, through a capitalized operating reserve or ongoing operating cost payments, for HOME-ARP units restricted for occupancy by qualifying households.

Beneficiary Requirements:

Eligible Beneficiaries: HOME-ARP funds must primarily benefit individuals and families that meet one of the qualifying populations defined in the Notice. However, not more than 30 percent of the total number of rental units assisted with HOME-ARP funds may be occupied by low-income households as defined in 24 CFR 92.2.

Household Income: The following income requirements apply to HOME-ARP households:

- Qualifying Households: At initial occupancy and each subsequent year during the minimum 15-year compliance period, the PJ must use the definition of annual income at 24 CFR 5.609 and the process described in the Notice to determine the household's contribution to rent.
- Low-Income Households: The PJ must use the definition of annual income at 24 CFR 5.609 and the process described in the Notice to examine the household's income at initial occupancy and each subsequent year during the minimum 15-year compliance period to determine the household's ongoing income eligibility and applicable contribution to rent.

Tenant Contribution to Rent:

A qualifying household may not contribute to rent more than is affordable based on the PJ's determination of the household's income.

Project Requirements:

- Targeting and Occupancy: Not less than 70 percent of the total number of rental units a PJ assists with HOME-ARP funds must be restricted to occupancy by households that are qualifying households at the time of the household's initial occupancy. Not more than 30 percent of the total number of rental units assisted with HOME-ARP funds by the PJ may be restricted for occupancy by low-income households. A household that met the definition of one or more qualifying populations at initial occupancy remains a qualifying household throughout their period of occupancy irrespective of changes in income or whether they continue to meet a qualifying population definition (e.g., no longer qualify as homeless after being admitted to a HOME-ARP unit)
- Property Standards: HOME-ARP rental units must comply with all rental property standards required in 24 CFR 92.251 paragraphs (a), (b), (c)(1) and (2), (e), and (f)
- Minimum Compliance Period: HOME-ARP rental units must comply with the HOME-ARP rental requirements for a minimum of 15 years, irrespective of the amount of HOME-ARP funds invested in the project or the activity undertaken. If a project-based rental assistance Housing Assistance Payments (HAP) contract is awarded to a HOME-ARP rental project, the minimum compliance period is the greater of 15 years or the term of the HAP contract.

<u>Rent Limitations</u>: HOME-ARP establishes rent limitations for units restricted for qualifying households and units restricted for low-income households as follows:

<u>Units Restricted for Occupancy by Qualifying Households</u>: The HOME-ARP rent may not exceed 30 percent of the adjusted income of a household whose annual income is equal to or less than 50 percent of the median income for the area, as determined by HUD (i.e., Low HOME Rents).

<u>Units Restricted for Occupancy by Low-Income Households:</u> HOME-ARP rental units restricted for low-income households must comply with the rent limitations at <u>24 CFR 92.252(a)</u>.

Additional HOME-ARP Unit Limitations, if applicable:

<u>Federal/State Project-Based Rental Subsidy:</u> A HOME-ARP unit that receives Federal or state project-based rental subsidy may charge the rent allowable under the rental subsidy program.

<u>Single Room Occupancy Units (SRO):</u> If an SRO unit has both sanitary and food preparation facilities, the maximum HOME-ARP rent is based on the zero-bedroom fair market rent. If the SRO unit only has sanitary facilities, the maximum HOME- ARP rent is based on 75 percent of the zero-bedroom fair market rent.

<u>Changes in Income and Over Income Households</u>: A PJ must take action to address over- income households occupying HOME-ARP units as follows:

<u>Qualifying Households</u>: A qualifying household whose annual income at the time of recertification is above 50 percent of median income for the area but below 80 percent of median income for the area must pay the rent specified in <u>24 CFR</u> <u>92.252(a)</u>.

<u>Low-Income Households</u>: A low-income household whose income is above 80 percent of the median income for the area must pay rent that complies with <u>24 CFR 92.252(i)(2)</u>.

<u>Lease and Tenant Protections</u>: Each household that occupies a HOME-ARP assisted unit must execute a lease that complies with the tenant protection requirements prescribed in the Notice.

<u>Master Leasing and Use of a HOME-ARP Sponsor:</u> A HOME-ARP sponsor – a nonprofit organization that provides housing or supportive services to qualifying households – may execute a lease for a HOME-ARP unit or a master lease for multiple units in a project. The HOME-ARP sponsor may then sublease the HOME-ARP rental unit to a qualifying household.

<u>Coordinated Entry and Project-Specific Waitlists</u>: On a project-by-project basis, a PJ must decide whether a project owner may use a Continuum of Care's (CoC) Coordinated Entry (CE), a CoC's CE and other referral sources, or a project-specific waitlist to select qualifying households for HOME-ARP units restricted for occupancy by qualifying households. A project owner must use a project-specific waitlist to select low-income households to occupy units restricted for occupancy by

Oversight and Management:

A PJ is responsible for the day-to-day management and oversight of its HOME-ARP program including but not limited to the following:

<u>Underwriting and Subsidy Layering</u>: A PJ must establish underwriting and subsidy layering guidelines for determining the appropriate amount of HOME-ARP funds, including any operating cost assistance provided to maintain the financial viability of the HOME-ARP project through the 15-year minimum compliance period.

<u>Enforcement of Rental Requirements</u>: A PJ must impose the HOME-ARP rental requirements through a deed restriction, covenant running with the land, legally binding agreement restricting the use of the property and recorded on the property in accordance with State recordation laws, or other mechanism approved by HUD.

<u>Project Completion, Occupancy and Noncompliance</u>: A PJ must repay any HOME-ARP funds invested in units that are 1) not completed within 4 year of project commitment, 2) not rented to eligible qualifying or low-income households within 12 months of project completion, or 3) terminated before completion or otherwise not compliant with the HOME-ARP rental requirements.

<u>Management and Oversight of Operating Cost Assistance Reserve:</u> A PJ must require any HOME-ARP funds expended for project operating cost assistance reserves be held by a project owner in a separate interest-bearing account with review and written approval from the PJ prior to any disbursement of HOME-ARP funds from the operating cost assistance reserve account to determine that it is

Overview:

HOME-ARP funds may be used to provide tenant-based rental assistance ("HOME-ARP TBRA") to individuals and families that meet one of the Qualifying Populations

A PJ may assist a qualifying household by providing payments towards housing and housing-related costs, such as rent, security deposits, utility deposits, and utility costs.

Because HOME-ARP TBRA is attached to the qualifying household and not a particular rental unit, the household may choose to move to another unit with continued assistance as long as the new unit meets the applicable property standards.

HOME-ARP TBRA may be provided in coordination with a non-profit HOME-ARP sponsor that facilitates a qualifying household's use of HOME-ARP TBRA. The HOME-ARP sponsor may make rental subsidy payments and a security deposit payment on behalf of a qualifying household or may sublease a unit to the qualifying household

Project Requirements:

Portability of Assistance:

A PJ may require the HOME-ARP TBRA assisted household to use the assistance within the PJ's boundaries or may permit the household to use the assistance outside its boundaries as outlined at 24 CFR 92.209(d)

Term of Rental Assistance Contract:

The PJ must determine the maximum term of HOMEARP TBRA assistance contracts and whether contracts will be renewable

Maximum Subsidy:

The PJ must establish policies for the allowable maximum subsidy, which may differ from the maximum subsidy requirements at 24 CFR 92.209(h). PJs may provide up to 100 percent subsidy for rent, security deposit payments, and utility bills. The PJ must also establish policies for determining any household contribution to rent

Project Requirements (cont.):

Rent Reasonableness:

The PJ must determine whether the rent is reasonable in comparison to rent for other comparable unassisted units and must disapprove a lease if the rent is not reasonable

Housing Quality Standards:

Housing must comply with all housing quality standards required at 24 CFR 982.401 (or successor inspection standards issued by HUD) unless the tenant is residing in a HOME or HOME-ARP unit, in which case the PJ may defer to initial and ongoing inspection standards for the housing

Use of a HOME-ARP Sponsor:

A HOME-ARP sponsor – a nonprofit organization that provides housing or supportive services to qualifying households – may facilitate the leasing of a HOME-ARP rental unit or the use and maintenance of HOME-ARP TBRA. A sponsor may make rental subsidy payments and a security deposit payment on behalf of a qualifying household

PJ Management and Oversight:

Rental Assistance Contract:

HOME-ARP TBRA must be provided through a rental assistance contract with the PJ and (1) an owner that leases a unit to a qualifying household; (2) the qualifying household, (3) a HOME-ARP sponsor or (4) an owner and the qualifying household in a tri-party contract

Lease and Sublease:

PJs must require and verify that there is an executed lease between the qualifying household and the owner of the rental unit or a between an owner and a HOMEARP sponsor with a sublease between the qualifying households and the HOME-ARP sponsor that complies with tenant protection requirements in accordance with 24 CFR 92.253(a). PJs may permit a HOME-ARP sponsor to execute a lease with an owner for an individual unit or a master lease for more than one unit restricted for occupancy by HOMEARP TBRA households

Written Agreement with HOME-ARP Sponsor:

The PJ must enter into a written agreement with the HOME-ARP sponsor if the HOME-ARP TBRA rental assistance contract is not with the HOME-ARP sponsor and the HOME-ARP sponsor will be receiving the HOME-ARP TBRA subsidy directly from the PJ

Overview:

A PJ may use HOME-ARP funds to provide a broad range of supportive services to individuals and families that meet one of the Qualifying Populations.

Supportive services may be provided to individuals and families who are not already receiving the services outlined in the Notice through another program.

PJs may establish a separate supportive services activity or activities or may combine supportive services with other HOMEARP activities.

Eligible Supportive Services:

There are three categories specifically included as supportive services under HOME-ARP:

McKinney-Vento Supportive Services:

McKinney-Vento Supportive Services under HOMEARP are adapted from the services listed in section 401(29) of the McKinney-Vento Homeless Assistance Act ("McKinney-Vento Supportive Services") (42 U.S.C. 11360(29)).

Homelessness Prevention Services:

HOME-ARP Homelessness Prevention Services are adapted from certain eligible homelessness prevention services under the Emergency Services Grant (ESG) regulations at 24 CFR Part 576.

Housing Counseling Services:

Housing counseling services under HOME-ARP are those consistent with the definition of housing counseling and housing counseling services defined at 24 CFR 5.100 and 5.111, respectively, except that homeowner assistance and related services are not eligible HOME-ARP activities

Eligible Costs:

HOME-ARP funds may be used to pay eligible costs associated with the HOME-ARP supportive services activity in accordance with the requirements of the Notice.

All qualifying households are eligible to receive supportive services under the HOME-ARP supportive services activity. Eligible costs associated with McKinney-Vento supportive services and homelessness prevention supportive services include:

- Costs of child care;
- Costs of improving knowledge and basic educational skills;
- Costs of establishing and/or operating employment assistance and job training programs
- Costs of providing meals or groceries
- Costs of assisting eligible program participants to locate, obtain and retain housing
- Costs of certain legal services
- Costs of teaching critical life management skills
- o Financial assistance costs, including:
- Rental application fees
- Security deposits
- Utility deposits
- Payment of rental arrears

Eligible Costs (cont.):

Please consult the Notice for a full list and description of eligible costs.

The costs of homelessness prevention services are only eligible to the extent that the assistance is necessary to help program participants regain stability in their current permanent housing or move into other permanent housing to achieve stability in that housing.

PJs must establish requirements documenting an eligible cost as McKinney-Vento supportive services to an individual or family in a qualifying population, homelessness prevention services, or Housing Counseling. Eligible Costs Associated with Housing Counseling: Costs associated with housing counseling services as defined at 24 CFR 5.100 and 5.111 are eligible. Costs may only be paid under HOMEARP if housing counseling services are provided by HUD-certified housing counselors and organizations.

Eligible Costs (cont.):

Eligible Costs Associated with Housing Counseling:

Costs associated with housing counseling services as defined at 24 CFR 5.100 and 5.111 are eligible. Costs may only be paid under HOMEARP if housing counseling services are provided by HUD-certified housing counselors and organizations.

Eligible costs include:

- Staff salaries and overhead costs of HUD-certified housing counseling agencies related to directly providing eligible housing counseling services to HOME-program participants
- Development of a housing counseling workplan
- Marketing and outreach
- Intake
- Financial and housing affordability analysis
- Action plans that outline what the housing counseling agency and the client will do to meet the client's housing goals and that address the client's housing problem(s)
- Follow-up communication with program participants

Costs for the provision of services to existing homeowners related to homeownership and mortgages to existing homeowners are not eligible under HOME-ARP.

If a program participant is a candidate for homeownership, costs associated with prepurchase homebuying counseling,

Oversight and Management:

A PJ is responsible for the day-to-day management and oversight of its HOME-ARP program including but not limited to the following:

Oversight of Eligible Costs:

All supportive service costs paid for by HOME-ARP must comply with the requirements of the Notice and Uniform Administrative Requirements at 2 CFR part 200, subpart E, Cost Principles that require costs be necessary and reasonable.

No Duplication of Services:

PJs are responsible for establishing requirements that allow a program participant to receive only the HOME-ARP services needed so there is no duplication of services or assistance in the use of HOME-ARP funds for supportive services.

Termination of Assistance:

The PJ may terminate assistance to a program participant who violates program requirements or conditions of occupancy.

Rext Steps

- 1. Develop the Allocation Plan in consultation with all appropriate parties
- 2. Amend the FY21 Action Plan in IDIS