

Substantial Amendment to the 2021 Annual Action Plan



Adam J. Bello
County Executive

For Housing & Community Development
in Suburban Monroe County

Acquisition Rehabilitation Resale Project



Before



After

Affordable Housing Project



Durand Senior Apartments, Irondequoit

June 15, 2021

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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: Monroe County

Date: 5/5/2022

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:

Monroe County, in partnership with the City of Rochester, Partners Ending Homelessness, the local Continuum of Care consultation process was comprised of several planning meetings among the partnership, hosted virtual meetings with the Partners Ending Homelessness, the City of Rochester, and the required qualifying populations. In December of 2021, the County and its partners announced the anticipated funding with the presentation to the Homeless Services Network (HSN), which comprise of a

consortium of care providers throughout Monroe County. Upwards of ninety participants are present at any given time. The presentation including funding amounts, eligible qualifying populations, its uses, and the consultation process. As part of the presentation, we also announced a survey that would be released to solicit feedback from the HSN group, other service providers who support and work with the eligible population, and partners. This survey was developed using some questions provided by HUD but included questions regarding the need in the community based on the providers in our community. This was the first of several virtual meetings and presentations regarding the HOME-ARP funding.

Additional consultations with Homeless Service Providers, Victim Service Providers, Veteran's Groups, Public Housing Agencies, Civil Rights Agencies, Fair Housing Agencies, Agencies that serve the Disabled population, and the general public. The virtual consultation meetings were held in January, February, and March of 2022. The County of Monroe, the City of Rochester, and Partners Ending Homelessness led the conversation using the Discussion Guide for HOME-ARP Consultation Meetings. Feedback was given and information was notated.

The County and its partners also used surveys to collect qualitative and quantitative data from the community and the aforementioned qualifying population providers. The service provider survey was released on December 22, 2021, and was open for approximately 3 months. The information and data collected from this survey have been analyzed and are included in this plan. In total, eighty-four responses were collected from a variety of different organizations including; homeless/housing service providers (27 survey respondents); Public Housing Authorities (14 survey respondents); Housing Developers (10 survey respondents); Local Governments (6 survey respondents); HealthCare (6 survey respondents); Education (4 survey respondents); Community Members/Residents (4 survey respondents); Landlords (4 survey respondents), and other group participants (9 survey respondents). A second survey was also released for consumers/persons accessing emergency shelter services. The second survey results were not available as of this Draft Plan.

Monroe County, as a Participating Jurisdiction, consulted with agencies and service providers whose clients include the HOME-ARP qualifying populations to identify unmet needs and gaps in housing and service delivery systems. In addition, a Monroe County used these consultations to determine the HOME-ARP eligible activities currently taking place within its jurisdiction and potential collaborations for administering HOME-ARP. These consultations provided a basis for Monroe County's strategy for distributing HOME-ARP funds for eligible activities that best meet the needs of the qualifying population.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Rochester Housing Authority	Public Housing Authority	Virtual 1/24/22	Case Management, Short-term emergency Housing, and more time for housing searches are all needed. More family/elderly housing is needed

Rochester Area Community Foundation	Funder/Serves Qualifying populations	Virtual 2/15/22	Is there a wage crisis? Is there continuity of systems? Renters are paying more for rent than they can afford. Need to confirm that community resources are actually adequate.
Housing Council/PathStone	Fair Housing/Civil Rights	Virtual 2/15/22	Streamline shared databases. There have been discrimination complaints related to housing quality. There is a lack of trust in sharing documentation amongst people.
YWCA	Domestic Violence	Virtual 2/15/22	Housing for people with disabilities, Mental Health and fleeing disabilities.
Empire Justice	Persons with Disabilities	Virtual 2/15/22	Supportive Services should match appropriate housing levels per ESL Rental Housing Study
Spiritus Christi Prison Outreach	Persons existing prison	Virtual 3/4/22	Landlords less likely to rent to those with bad credit/rent history. Qualifying populations have greater barriers to securing housing than typical households because of the lack of documentation.
Eagle Star	Veterans	Virtual 3/4/22	Need help in securing documentation, searches, and continued case management. Limited supply of adequate affordable housing.
Willow Center	Domestic Violence	Virtual 3/4/22	Rent Subsidies and wrap-around services

If additional space is needed, insert image of table here:

CONTINUATION OF CONSULTATION CHART			
AGENCY / ORGANIZATION CONSULTED	TYPE OF AGENCY / ORGANIZATION	METHOD OF CONSULTATION	FEEDBACK
Rochester Housing Authority	Public Housing Authority	Virtual 1/24/22	Case Management, Short-term emergency Housing, and more time for housing searches are all needed. More family/elderly housing is needed
Fairport Housing Authority	Public Housing Authority	Virtual 1/24/22	Finding affordable housing is a challenge
Rochester Area Community Foundation	Funder/Serves Qualifying populations	Virtual 2/15/22	Is there a wage crisis? Is there continuity of systems? Renters are paying more for rent than they can afford. Need to confirm that community resources are actually adequate
Housing Council/PathStone	Fair Housing/Civil Rights	Virtual 2/15/22	Streamline shared databases. There have been discrimination complaints related to housing quality. There is a lack of trust in sharing documentation amongst people.
Legal Aid Society of Rochester	Civil Rights/Fair Housing/Legal Services	Virtual 2/15/22	More outreach and advocacy for Fair Housing. Barriers to assistance like transportation, etc.
YWCA	Domestic Violence	Virtual 2/15/22	Housing for people with disabilities, Mental Health and fleeing disabilities.
Legal Aid Assistance of Western NY	Fair Housing/Civil Rights/Legal Services	Virtual 2/15/22	Hands on help is needed to find housing – Housing Navigator
JustCause	Fair Housing/Fair Housing/Legal Services	Virtual 2/15/22	Lack of safe Affordable Housing. Fair housing services against

Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive,
- The range of activities the PJ may undertake.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Public comment period:*** start date - 5/5/2022 end date - 6/13/2022
- ***Public hearing:*** 5/5/2022

The public hearing, which was available for in-person as well as virtual participation was held on May 5, 2022 at 10:00a. Community input and engagement has been the driving force in the development of the County’s HOME-ARP Allocation Plan. Information from the surveys, virtual consultation meetings, and any comments and recommendations received during the public comment period will be considered in the Final Substantial Amendment to the 2021-22 Annual Action Plan submission to HUD.

Describe any efforts to broaden public participation:

The public notice was posted in the Daily Record, Rochester Business Alliance, and the County website. The public comment period was available for for 37 days to allow for more time to solicit public comments and input on the County’s HOME-ARP Draft Allocation Plan. Once the Draft HOME ARP Allocation Plan is made available, the County will also email the link to local stakeholders, interested parties, partners, and the Homeless Services Network advocacy group for their comments and input and will be considered in the final Plan for submission to HUD.

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:

Monroe County will respond to all comments and recommendations received in writing during the public comment period.

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

All comments, questions, and recommendations will be accepted and considered and will be included in the Final Substantial Amendment to the 2021-22 Annual Action Plan for the additional HOME ARP funding.

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

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	208	71	255	255	0								
Transitional Housing	30	17	156	156	55								
Permanent Supportive Housing	557	201	786	786	1989								
Other Permanent Housing						0	0	0	#				
Sheltered Homeless						48	319	49	90				
Unsheltered Homeless						0	33	0	2				
Current Gap										394	197	48	48

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	109,035		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	30,000		
Rental Units Affordable to HH at 50% AMI (Other Populations)	20,160		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		5,590	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,725	
Current Gaps			5,590

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

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

On any given night in Monroe County, there are 815 people experiencing homelessness. There are 117 Non-Hispanics with children living in emergency or transitional housing. There are 37 Hispanics living in emergency or transitional housing. Information provided by Partners Ending Homelessness identify 53 whites with children, 90 Blacks/African Americans, 4 Pacific Islanders, and 7 multiple races, all with children are living in emergency or transitional housing. There are 15 households with children only, living in emergency or transitional housing of whom 14 are females, 10 being Non-Hispanic. Demographics from the most recent 2021 Point-in-Time (PIT) identifies 352 households without children. Of the 352 households, 82 are female, 265 are male, 4 are transgender, and 1 is Non-Conforming. 301 of the 352 households are Non-Hispanic, 51 are Hispanic, 146 are White, 185 are African American, 1 Asian, 3 Native American, 1 Hawaiian, and 16 Multiple Races. 68 persons are Chronically Homeless.

Current PIT identifies 1 White Male Veteran with 4 children living in emergency shelter. Our PIT also identifies 49 persons living without children living in emergency or transitional housing. Of the 49 persons, 48 are male; 27 being white, 21 being African American and 1 being Native Hawaiian. 90 adult survivors of Domestic Violence are in emergency or transitional housing. 2 victims are unsheltered.

More detail is being gathered on the qualifying populations and will be included in the final HOME ARP Allocation Plan

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness;***
and,
- ***Those at greatest risk of housing instability or in unstable housing situations:***

Through consultations and surveys, the greatest need were: 1 – development of affordable rental housing; 2 and 3 were acquisition and development of non-congregate shelters and supportive services; 4 – Tenant Based Rental Assistance (TBRA); 5 – non-profit operating and capacity building. The data indicates that there is a need for affordable rental housing for extremely low income households. This forces many extremely low income households to rent units above 30% of their income causing a housing cost burden or even 50% above their income causing severe cost burden. Many of these households experience other housing issues, but have limited options available to remedy these issues.

Many of our sheltered and unsheltered homeless populations lack support services. Services include, mental health, drug & alcohol, and those living with AIDS. Our Victim Support and Veterans Group consultation expressed there is a need for Wrap-around Case Management

Services that include the need for assistance gathering personal documentations for rental units. These services also include those exiting an institution or jail.

Sheltered/Unsheltered Homeless;

As of the last PIT count from January 2021, there were 358 persons within the emergency shelter system, out of a total 463 beds. Of these, 66 households were families with children, and 255 were households without children. There were 33 unsheltered persons found during the PIT count in 2021, down from 44 in 2020. This continued a downward trend from prior years (2017: 65, 2018: 56). The need for beds within the shelter system can fluctuate based on season and type of unit needed, but many respondents to the survey stated that a non-congregate shelter of some type is needed within the community. These non-congregate type shelters were established during COVID, and were often used for those at the highest risk of transmission or for those that had tested positive. However, the use can be much greater than that, and would add to the continuum of services offered in the community.

Currently Housed/At-Risk of Homelessness;

The CHAS and ACS data showed the County of Monroe as having 30,000 renter households with incomes at or below 30% AMI. Renters with extremely low income (ELI) represent 28% of all renter households.

Other Populations Requiring Services or Housing Assistance to Prevent Homelessness;

Over the past two years, the County and its partners have worked on several programs aimed at preventing homelessness in the community. One initiative offered rental arrears assistance and the second offered legal assistance to persons facing eviction. It is difficult to determine the exact size of these populations, as the numbers in recent years have risen due to the pandemic, but utilization rates with these services in Monroe County were higher than the norm. More data on the individual qualifying populations will be included in the final Allocation Plan prior to submittal to HUD.

Those at Greatest Risk of Housing Instability;

The CHAS and ACS data shows the County of Monroe with 30,000 renter households with incomes at or below 30% AMI. Of those, 21,185 households are considered to have a severe housing cost burden. Households earning less than 30% AMI make up 70.5% of all severely cost burdened households in Monroe County.

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:

The majority of the services available recently to the community were increased or funded by programs and funding sources related to COVID. CARES Act funding, including ESG-CV and CDBG-CV, and Emergency Rental Assistance Program (ERAP) dollars are largely spent, or will be fully spent in the near term.

Current resources include annual HUD funding for the County, City, and CoC, federal and state funding for affordable and supportive housing, local foundations and private donor support, as well as ongoing support for Housing Choice Vouchers.

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

Emergency financial assistance for homelessness prevention is available to households that request it for the purpose of housing stability, the influx of funding from CARES Act and Treasury (Emergency Rent Assistance Program - ERAP) and HUD (ESG-CV) was largely spent. The need for this type of assistance remains high and funding is limited. The need for New Affordable Housing, or safe Affordable Housing remains to be a high priority amongst survey participants, community members, and consultant participants.

Access to services can be overwhelming and gathering materials needed to be approved for services or rentals can also be overwhelming. Case management and other supports are often used to help people exiting institutions or those seeking housing and stability services as they make their way through the services/housing application processes. These services were closely ranked as high priority needs in our survey and among our consultant participants. Housing rights and assistance in courthouse within the county of Monroe and the city of Rochester have been highly utilized and identified equally as a must needed continued service. It was noted at our February 15th, 2022 consultation, that there is a discontinuity in our service delivery systems and more must be done.

Lastly, there is a gap in non-congregated shelters. During the pandemic, it was identified that there is a lack of non-congregate shelters, and low-barrier shelters. The need to have private space for individuals from the homeless population was difficult, and in many cases, hotel rooms were secured, however, these spaces were not in ideal or accessible locations, making it incomprehensible to house homeless individuals (ie: those who suffer from drug & alcohol addiction/abuse household next to a liquor store.)

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

Rent burden is defined as spending more than 30% of a household’s income on housing expense. Affordable housing means only spending 30% or less of a household’s income towards housing related expenses. When a household’s share exceeds that 30% threshold, it impacts a household’s ability to buy food and support other essentials like healthcare and transportation. A higher rent burden is often associated with a greater risk of eviction, or risk of homelessness.

Since the beginning of the pandemic/rent moratorium, rents have increased significantly. In many cases, rents are higher than HUD’s fair market rates causing households to spend more than 30% of their income. In fact, many households/individuals are being denied access to

housing due to the households' ability to prove their ability to afford 30% of their income for housing, causing households to fall short of access to decent, safe affordable housing and leading to other qualifying populations being at risk of eviction or risk of homelessness. Housing cost burden can therefore be viewed as a strong contributor to homelessness.

Housing costs have become extraordinarily high, and extremely low incomes have led to a high number of households facing a rent burden and housing instability. Fifty percent of renters are below HUD's 50% AMI in Monroe County. Families are paying more than 50% of monthly household income toward housing costs.

Identify priority needs for qualifying populations:

Priority needs include safe affordable housing. Affordable housing was identified as the number one priority from the 84 participants of the survey, and amongst our consultant participants in each category.

Supportive Services that include homeless prevention, on-going case management, job readiness services and housing search and counseling were significant outcomes through consultations and survey results. A discontinuity of services exist. Services that help individuals leaving institutions and help individuals secure important documents is needed. Wrap-around services and noncongregate shelters have all been identified through our survey respondents and consultant participants as priorities.

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

The County in collaboration with the City of Rochester, Partners Ending Homelessness obtained information on the homeless population and housing inventory serving the homeless through the Homelessness Data Exchange provided by the Partners Ending Homelessness (CoC) reports. The reports came from information obtained in the annual Point In Time counts and the Housing Inventory Count conducted in 2019 and 2021. The final 2022 information was not available at the time of this Draft but will be considered in the Final Allocation Plan should it be available.

Income and housing statistics were taken from various sources, including 2014-2018 ACS and decennial Census Data (2010 and 2020) from the US Bureau of the Census. Housing and household data was taken from the 2014-2018 Community Housing Affordability Strategy (CHAS) data.

HOME-ARP Activities

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

The County anticipates releasing Request for Proposals/Qualifications (RFP/RFQ), and/or Notice of Funding Availability/Opportunity (NOFA/NOFO) in partnership with the City and Partners Ending Homelessness to solicit proposals and will continue to gather input and feedback from other partner agencies, internally and externally.

Final decisions on program administration or solicitation process are still being discussed for each eligible program component.

Monroe County does not anticipate we will directly administer eligible activities, but will provide technical assistance/be a strong partner/advocate for and with our awardees who will be directly administering programs or projects.

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:

N/A

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	\$ 643,501.80		
Acquisition and Development of Non-Congregate Shelters	\$ 858,002.40		
Tenant Based Rental Assistance (TBRA)	\$ 429,001.20		
Development of Affordable Rental Housing	\$ 1,501,504.20		
Non-Profit Operating	\$ 107,250.30	2.5 %	5%
Non-Profit Capacity Building	\$ 107,250.30	2.5 %	5%
Administration and Planning	\$ 643,501.80	15 %	15%
Total HOME ARP Allocation	\$ 4,290,012		

Additional narrative, if applicable:

The Draft HOME ARP allocation plan was established based on the survey results and statutory limits.

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

The characteristics of the shelter and housing inventory, the service delivery system and the needs identified in the gap analysis as well as responses from the survey and consultation meetings provided the rationale for funding new affordable housing as an overwhelming desire in our community. This need is especially identified in extremely low income populations, 30% or below the AMI, and are at-risk of homelessness among qualifying populations. Through our survey (84 respondents) and required consultations, supportive services as it relates to homeless prevention, wrap-around case management services, housing rights support, and initiatives that support securing identification documents for those exiting institutions were all identified as highly needed and a gap within our service delivery systems; also described as a discontinuity in services currently being available in our community.

Affordable rental housing is limited for those whose incomes are below 30% of the AMI. Affordable rental housing in suburban Monroe County are for those with 50% or 60% AMI, and are identified as affordable, but there is an extremely low-income population where clean, safe affordable rental housing is not available, therefore housing subsidies are needed preferably with supportive services that move clients from one level to the next towards stability within households. This will be done by securing or building new affordable housing at or below 30%, allowing for subsidies for tenant based rental assistance, and providing supportive wrap-around services within affordable housing units/structures and noncongregate shelters.

The rationale for allocating funding this way is due to the data, consultation meetings, and survey results. After much discussion with each consultation group and review of the survey responses, the County determined that the above distribution is currently the best fit for the needs of the community. The distribution of ARP funding for each category of activities may be amended as other funding becomes available or leveraged.

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:

The County has not made determinations on the number of affordable rental housing units during its planning process for the Allocation Plan. This number of units would be based on the cost of development and other funding that may be leveraged.

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:

The County works with local affordable housing developers to ensure that all developments include units that meet the needs of a variety of households, including extremely low income and very low income households and other qualifying populations within the HOME ARP guidelines. The County will continue to work with County departments, partner organizations, the City, and the State to leverage funding opportunities and develop housing that is safe and affordable.

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.

Monroe County has not made determinations on providing preference to any qualifying population as of the Draft Plan. Preferences may be established within individual programs or projects to target the qualifying populations, or a higher need subpopulation, but the methodology has not been decided. Should preferences be given, all projects will comply with requirements outlined in 24 CFR 5.105(a).

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:

N/A

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:

N/A

HOME-ARP Refinancing Guidelines

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

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

N/A

- ***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.

N/A

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

N/A

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

N/A

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

N/A

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

N/A