

## HOME-ARP Allocation Plan Template with Guidance

**Instructions:** All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

### Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- 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.

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.

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

Enter narrative response here.

*List the organizations consulted:*

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>ASC</b>	Homelessness, HIV/AIDS	Survey, email, meeting	See narrative
<b>The Spectrum Center</b>	LGBT+ medical, mental health, legal resource center	Survey	See narrative
<b>Changes Resource Center</b>	Mental health and homelessness	Survey, email, phone call	No response
<b>Community Development Inc.</b>	Mental health, elderly and disabled	Survey	See narrative
<b>Domestic Abuse Family Shelter-DAFS</b>	Domestic abuse	Survey, email, phone call	See narrative
<b>DREAM of Hattiesburg Inc</b>	Drug abuse	Survey, email	No response
<b>Hope Community Collective</b>		Survey, email, phone call	See narrative
<b>Mississippi Balance of State Curriculum of Care</b>	Homeless services	Meetings	See narrative
<b>Living Independent for Everyone (LIFE) of Mississippi</b>	Disabled	Survey	See narrative
<b>Hattiesburg Housing Authority</b>	Housing	Phone call	See narrative
<b>Not My Seed, Inc</b>	Domestic violence and bullying	Survey	See narrative
<b>Pine Belt Coalition on Homelessness</b>	Homelessness	Meeting	See narrative
<b>Pine Belt Community Foundation</b>	Private organization	Survey	See narrative
<b>Pine Belt Mental Healthcare</b>	Mental healthcare	Survey, email, phone call	No response
<b>Recover, Rebuild, Restore Southeast Mississippi (R3SM)</b>	Private organization	Survey, phone call	See narrative
<b>The Salvation Army-Hattiesburg</b>		Survey, email, phone call	See narrative
<b>Supportive Services for Veteran Families</b>	Veteran's services	Survey	See narrative

<b>USM – Institute for Disability Studies</b>	Disabled	Survey, phone call	See narrative
<b>National Association for the Advancement of Colored People (NAACP)</b>	Civil rights, fair housing	Phone call	No response
<b>City of Hattiesburg Administration</b>	Public, all QPs	Meeting	See narrative

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

In addition to the survey responses, we conducted several follow-up discussions with respondents that supplied contact information. Though we reached out by email and phone to each of these individuals, we were not able to make direct contact with everyone. For the purposes of anonymity, direct quotes and paraphrased feedback will not be directly attributed to specific individuals. We will organize this section by topic and provide relevant takeaways from each of these individual meetings or phone calls.

One of the most prevalent topics that arose throughout the survey and community conversations was the absence of a temporary or emergency shelter in the city. Each of the individuals that we met with had unique insight into this issue from a variety of perspectives. First and foremost, the recognition that a temporary shelter is one of, if not the, most glaring needs for the city is practically universal. Until the 2017 tornado, the Salvation Army operated a shelter that consisted of 52 beds. Feedback from several respondents/interviewees suggested that even prior to the tornado, there were disconnects between the shelter and the homeless population. For instance, one interviewee shared that state issued identification was an intake requirement for the shelter, which made it inaccessible for many of the most vulnerable members of the community. The operational costs of the shelter were also a heavy burden on the Salvation Army, which threatened the organization’s ability to continue to operate other programs, such as the Boys and Girls Club.

After the tornado, and during the attempt to rebuild the shelter, Salvation Army leadership discovered that the building was not adequately insured. So, while the facility has been rebuilt to some extent, there are still major repairs and renovations that would be necessary for it to reopen. This includes plumbing, security systems, flooring, mold mitigation, and additional furnishings. There are also concerns about the location of the shelter, particularly its proximity to the organization’s after school programs.

In the almost six years since the tornado, there has been little consensus on the best path forward. Although it seems like a simple solution should be to reopen the facility that previously served as the temporary shelter, the obstacles to that are not simply the lack of adequate funding. It is possible that another location would be more suitable and that another organization would be better situated to staff and operate an emergency shelter. The Salvation Army facility could then be repurposed as transitional housing, which would still provide a housing solution.

Another common issue that arose in follow-up discussions was the need for more affordable housing inventory in general. Hattiesburg, like most of the country, has seen housing costs spike in recent years, driven in part by the impacts of the COVID-19 pandemic and subsequent economic and supply chain conditions. On top of the national housing environment, several areas of the city have yet to fully

rebuild from a number of natural disasters (including tornadoes in both 2017 and 2013). This is shown in the vacant housing data discussed later in this report. We learned through follow up discussions that R3SM has assisted in the full reconstruction of 30 homes that were destroyed in 2017 and assisted with over 100 repairs to homes that were not completely destroyed. Even still, there are many more housing units that remain uninhabitable.

In addition to the single-family housing unit inventory, multiple respondents and interviewees highlighted the need for additional housing assistance across the board. Some focused on the need for more affordable multifamily housing development, some on the need for additional housing subsidies and rental assistance, and some focused primarily on housing needs for subpopulations (those suffering from addiction, domestic violence victims, or LGBT+ youth, for example). In many cases, such facilities/programs already exist, but are unable to fully meet the needs of the community due to lack of space or resources. Another concept discussed in one follow up interview was the possibility of “scattered site sheltering”, which would provide a more flexible housing solution that could adapt to the needs of different populations while mitigating community pushback over the location of the facility.

Another frequent topic of discussion in follow-up interviews was the challenges in the community related to interagency collaboration. Meetings with BOS leadership revealed that Hattiesburg lags behind other areas in the state in terms of utilization of the CES and VI-SPDAT. From both the survey responses and follow-up discussions, it’s clear that some organizations use these centralized systems inconsistently (if at all) which makes the entire system less reliable for those that do. Interestingly, nearly every survey respondent and many of those that we met with felt that there is a strong culture of collaboration between organizations in the city. The caveat being that the system of cross-agency referrals is generally informal and rooted in personal networks. The decentralized nature of this ecosystem makes it difficult for anyone to understand a full picture of what services are being provided, to whom, by whom, and to what extent.

An observation that was brought up more than once was that the resistance to using these tools is due primarily to a disconnect in understanding, not of how to use them but of the importance of their use. Many interviewees felt that opportunities for training have been sufficient, but that many organizations do not see the value they bring.

Building on the conversations surrounding interagency collaboration, we frequently discussed the gap between the service providers and the community at-large. Nearly everyone we talked to mentioned that they interact with churches and faith-based organizations on a regular basis. In many cases, churches in the community are the first to make contact with an individual or family in need of services. Unlike the organizations providing direct services, church staff members are not familiar with or trained to use the CES. Instead, they will simply call relevant organizations with requests or to make referrals. Intentional outreach and education for churches, or similar organizations, that regularly interact with homeless individuals or those who are at-risk would greatly benefit the agencies providing direct services.

Another point of emphasis was the lack of professional diversity present at the Pine Belt Homeless Coalition meetings. One interviewee pointed out that the monthly meetings are well attended, but that

those present are all either full-time employees or student interns for service providers. This individual expressed a desire to see more business leaders, healthcare professionals, and religious leadership present at these meetings. This would increase visibility of the needs of these organizations within the community and provide useful experience and perspectives that are not currently well-represented.

Multiple individuals that we spoke with brought up the unique challenge of serving the homeless population in Hattiesburg, specifically as it pertains to a large subset of the population that is highly transient. Hattiesburg's central location between Jackson, the Gulf Coast, New Orleans, and Mobile, results in a significant number of homeless individuals that are "just passing through". Volunteers and service providers have long struggled with how to address this population, particularly with how to capture those individuals using the CES and VI-SPDAT. If someone is entered into the system and then "leaves town", there is not an accurate option available to resolve their case in the system.

To explain the impact of this issue, we will use a common example of a homeless individual arriving into Hattiesburg with plans to leave for a larger city within a few days. In these scenarios, agencies are put in a situation where they have two general options.

They can use the assessment tools and CES, even though they know that they will not be able to make contact with this person again. Overtime, this results in a list full of people identified in need of services that not only cannot be contacted but are likely no longer within 100 miles of the city. This reduces the effectiveness of the tool for those individuals that can benefit from local services and punishes the agencies for using the provided tools by negatively impacting their metrics for reasons that are outside of their control. Their second option is to try to provide services for the individual without using the centralized system and assessment tools. This results in an underreporting of activity and creates a barrier between the individual in need and the resources intended to assist them.

Importantly, the transient population is the most negatively impacted by the lack of a temporary shelter. Since these individuals have no intention of staying in Hattiesburg for longer than it will take them to find transportation to their next destination, intermediate/long-term housing solutions are not helpful to them. Additionally, the lack of reliable data undercuts local agencies' ability to justify the need for very short-term services like overnight shelters or transportation assistance.

## **Public Participation**

In accordance with Section V.B of the Notice (page 13), 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.

PJs are required to make the following information available to the public:

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

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

*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:*

- *Date(s) of public notice: 2/16/2023*
- *Public comment period: start date - 2/16/2023 end date - 3/20/2023*
- *Date(s) of public hearing: 3/20/2023*

*Describe the public participation process:*

Enter narrative response here.

*Describe efforts to broaden public participation:*

Enter narrative response here.

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

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**

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. 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.

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

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

Point in Time (PIT) Counts for this Gap analysis utilize data provided by the Mississippi Balance of State's (MSBOS) Regional Command Center. These PIT Counts utilize 24 CFR 91.5 as the basis for defining Homeless individuals. This data was for Forrest County, and therefore may contain individuals outside of the city limits of Hattiesburg. Given the population and homelessness services density of Hattiesburg, it is likely most of the individuals contained in the PIT Count for the county regularly traverse the city limits. PIT Counts for 2020 and 2022 were provided for this gap analysis, detailing age, gender, demographic, and chronically homeless status for all counted persons.

In 2020 there were 120 individuals experiencing homelessness within the county, with the majority of these individuals being over the age of 24 (115). In this same period, there were four (4) children under the age of 18 who were homeless and only one (1) adult between the ages of 18-24 experiencing homelessness. The PIT Count for 2022 showed a 58% decrease in the total number of individuals experience homelessness, with only 69 total individuals experiencing homelessness within Forrest County in 2022. Children experiencing homelessness decreased to only one (1) child while adults between the ages of 18-24 increased to three (3). There were 29 individuals experiencing chronic homelessness in the 2020 PIT count, with a decrease of 35% to 19 as of the 2022 PIT Count. The number of veterans experiencing homelessness did not change in the 24-months between the two counts, with both the 2020 and 2022 PIT Count identifying six (6) veterans experiencing homelessness within Forrest County. However, it should be noted that it is likely that the individuals included in the count of veterans were different individuals based on variances in reported household size and demographic data for veterans in the 2020 and 2022 PIT Counts.

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

The first criteria for an individual or family to be categorized as "at-risk of homelessness" by the United States Department Housing and Urban Development's (HUD) definition is having a household income below 30% of the area's median household income. The median household income for the City of Hattiesburg is \$36,729 (ESRI 2022), and the HUD defined threshold for 30% AMI for the city is \$13,200 for a household with only one (1) member. Within the city, there are an estimated 5,661 households that meet this criterion. While it is likely that there are more households with incomes less than 30% AMI, the number of households identified as earning under \$13,200 represents over 10% of the city's population. Considering the number of households qualifying for the lowest possible AMI band, investigations of additional qualifications for income ranges are not necessary to validate the large population qualifying as at-risk of homelessness.

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

According to data published by the Hattiesburg American, there were 233 domestic violence incidences in Hattiesburg in 2019. In 2020, that number rose over 20% to 282 cases. Through October of 2021, there were 280 total cases. In an interview conducted for this gap analysis with a representative from the Domestic Abuse Family Shelter, we learned that the shelter's 26 beds are consistently full. Additionally, while the PIT Count data shows consistent decreases in homelessness across demographics from 2020 to 2022, the number of individuals fleeing domestic violence nearly doubled from 7 to 13. All of these data points suggest a rise in need for resources and spaces dedicated to serving victims of 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***

HUD's definition of At Risk of Homelessness has eleven (11) qualifying criteria across three (3) different categories, making identifying all individuals or households from public data sources difficult. To provide comprehensive data set of the population that is at risk of homelessness within Hattiesburg, we have provided multiple sets of economic and demographic metrics across multiple geographic areas within the city that may have higher concentrations of individuals and families that are at risk of housing instability. These characteristics included disability status, housing costs as a percentage of income, age, and public assistance eligibility.

**Disabled Persons**

This dataset includes households with at least one (1) member that has a disability. Data containing the exact number of individuals that have a disability was not available, meaning the total individuals with disabilities in each block group could be higher than what is reported here. A household containing a member with a disability does not immediately indicate a need for assistance or an immediate risk of homelessness. However, there are few housing units within Hattiesburg and Forrest that provide specialized care for individuals with disabilities and rental assistance.

**Housing Costs**

The only income driven determination of at risk of homelessness by HUD's definition is based on household income vs. the Area Median Income (AMI). However, the guidelines for HOME-ARP (CPD-21-10) allows for funding to be directed to "Other Populations" including those "At Greatest Risk of Housing Instability", which in part includes households paying 50% or more of their income in rent.

**Senior Population**

A major issue facing senior populations is the reality of living on fixed incomes with rising costs of living. There are also a limited numbers of assisted living facilities that accept rental assistance.

**Educational Attainment**

Educational Attainment is not directly a qualifier for at risk of homelessness or homelessness by HUD's definitions. However, income levels for households and individuals are closely tied to educational attainment.



Areas with concentrations of individuals with low educational attainment often face a myriad of challenges that qualify them as at risk of homelessness or result in temporary or chronic homelessness.

#### Population Below Poverty Line Not Receiving SNAP Benefits

The income limits for receiving Supplemental Nutrition Assistance Program (SNAP) benefits are close to HUD's AMI bands for the 30% Limit and Very Low-Income categories for all household sizes in the Hattiesburg area. For smaller households, the difference in income levels for SNAP qualification vs. HUD's 30% Limit is less than 1%. While this alone does not directly qualify a household as at risk of homelessness, the HOME-ARP guidelines (CPD-21-10) do allow funds to be used to assist qualifying populations in "Obtaining federal, State, and local benefits". Therefore, data on households within Hattiesburg that qualify for but do not receive SNAP benefits indicates there are challenges facing populations within these areas that qualify as at risk of homelessness in accessing SNAP or other local, state, and federal benefits.

#### Unemployment

While unemployment is not a direct qualifier for at risk of homelessness or homelessness, individuals who are unemployed for significant portions of a year likely qualify as at risk of homelessness under HUD's definition (24 CFR 91.5). Data on the length of unemployment by geographic location is not available for the Hattiesburg area, but areas with high unemployment rates are likely to contain many households and individuals that qualify for assistance and/or rental assistance through HUD. HOME-ARP guidelines (CPD-21-10) designate "Employment assistance and job training" as eligible uses for HOME-ARP funds.

***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):***

Enter narrative response here.

***Describe the unmet housing and service needs of qualifying populations:***

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

The most pressing need facing the homeless population of Hattiesburg is an emergency shelter. There are many other needs, including expanded access to healthcare and mental health services, but the lack of emergency shelter is glaring gap in the community. There are many other basic needs that overlap with the need for emergency/temporary shelter, including access to laundry services, showers, and a centralized location for coordinating resources.

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

The consensus opinion of survey respondents, which is supported by the review of available subsidies and housing inventory data, is that the existing preventative measures for those at-risk of homelessness are currently stretched thin and are not adequate for the true needs in the community. In 2022, there

are 1,107 more households with incomes 30% or less than the Area median income than there are housing units that accept/offer Section 8. Additionally, there are 653 more households that qualify for Low-Income Housing Tax Credits than there are rental units that qualify for the same program. Furthermore, the number of households living below the poverty line without SNAP benefits points to a need in certain areas of the community to educate those in need about the resources available to them. An expansion of these subsidies and targeted outreach is needed to provide greater stability to these households.

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

In October of 2021, the City of Hattiesburg announced the establishment of a new Domestic Violence Court that works with the Hattiesburg Police Department, the DAFS, and PBMH to provide more comprehensive programs for victims of domestic violence. This new resource was created in response to the noted rise in domestic violence incidences. A gap still exists for shelter spaces for these victims.

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice***

The needs of this population overlap significantly with homeless and at-risk populations covered above. There is a need for expanded housing inventory and access to resources, especially for those neighborhoods impacted by recent natural disasters.

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

The largest gap, as evidenced by community feedback and PIT count data, is the lack of an emergency or temporary shelter. The Salvation Army emergency shelter that previously served the city was closed in 2017 after extensive tornado damage. Though the facility was partially rebuilt and repaired, a plan for reopening has yet to be developed.

For the At-Risk of Homelessness populations, the cost of housing and access to affordable housing is a significant challenge. The primary source for this data is HUD's Comprehensive Housing Affordability Strategy data. Homeowners do not typically meet the definition of At-Risk of Homelessness (24 CFR 91.5) due to the financial mechanisms available to property owners, as low-income homeowners are not rendered immune to the risk of homelessness. Based on a review of the existing housing units in Hattiesburg that offer one or more of HUD's rental assistance programs (including Project Based Vouchers) and the number of individuals that qualify for said housing units, there is a total gap of 1,760 affordable housing units in Hattiesburg.

A unique element of housing in Hattiesburg is the impact and lingering effect of two tornados, an EF-4 in 2013 and an EF-3 in 2017, that severely damaged some of the most vulnerable residential areas in the city. These tornados displaced hundreds of residents, many of whom have yet to and may never return

to their homes. The tornados also left behind hundreds of vacant housing units that need substantial renovation or complete rebuilds in some cases. The effort to rebuild after the storms is ongoing, with organizations such as R3SM making this effort a primary mission.

***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:***

Enter narrative response here.

***Identify priority needs for qualifying populations:***

Enter narrative response here.

***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:***

Enter narrative response here.

## **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:***

On recommendation of the consultant, because of the belief several organizations have financial capacity for on-going operations, The City has determined publishing a request for proposals to be the best method.

***Describe whether the PJ will administer eligible activities directly:***

The City plans to monitor the administration of the eligible activities awarded via request for proposal.

***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:***

A portion of HOME-ARP administrative funds will be expended prior to HUD’S acceptance of the HOME-ARP Allocation Plan. The City contracted with Local Impact Analytics to conduct the Needs Assessment and Gap Analysis used for the basis of the plan.

In accordance with Section V.C.2. of the Notice (page 4), 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.

**Use of HOME-ARP Funding**

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0.00		
Acquisition and Development of Non-Congregate Shelters	\$ 914,161.40		
Tenant Based Rental Assistance (TBRA)	\$ 0.00		
Development of Affordable Rental Housing	\$ 0.00		
Non-Profit Operating	\$ 0.00	0 %	5%
Non-Profit Capacity Building	\$ 0.00	0 %	5%
Administration and Planning	\$ 161,322.60	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,075,484.00</b>		

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

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:*

N/A

*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:*

N/A

**Preferences**

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-

ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a 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).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.**

**For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

***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:***

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 subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Enter narrative response here.

## **Referral Methods**

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then

prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

***Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):*** Multiple referral methods will be in use for HOME-ARP projects and activities. Including the Mississippi Balance of State CoC's centralized referral hotline, online portal, and outreach teams. As well as community referrals from hot meal services, faith-based organizations, law enforcement, social services, and other community access points.

***If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):***

The Mississippi Balance of State Continuum of Care Coordinated Entry System will expand to include all qualifying populations within HOME-ARP

***If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):***

The Mississippi Balance of State Continuum of Care will apply preferences and prioritization in accordance with the preferences and prioritization established in the HOME-ARP allocation plan.

***If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):***

The standard prioritization methods across all programs in the Mississippi Balance of State Continuum of Care: VI-SPDAT assessment tool for individuals and families in literal homelessness and a Homeless Prevention assessment tool for those that are considered "at-risk."

### **Limitations in a HOME-ARP rental housing or NCS project**

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.

- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

***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:***

N/A

***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:***

N/A

***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):***

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***

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.