

HOME-ARP Planning Process Webinar

Meghan Takashima: This presentation will focus on the HOME-ARP planning process. My name is Meghan Takashima and I'm joined by Joyce Probst MacAlpine. We are from Abt Associates and are technical assistance providers for HUD.

Just a little bit of background and some grounding for the webinars. The HOME-ARP planning process is significantly different from the annual HOME program, and the process for the annual HOME planning, and it will require new guidance and a dedicated substantial amendment. Next slide please

Today we will review the planning requirements, the notice outlines, and the expectations for PJs. We will emphasize the ways this process can be conducted most effectively and efficiently to obtain the necessary information for your needs assessment, gaps analysis, and submission of the allocation plan.

So, as we think about the purpose of today's webinar, it will review the HOME-ARP planning requirements, identify the agencies that PJs must consult with, and the information they can provide in order to develop a needs assessment and gaps analysis. We'll also review the process to complete the needs assessment and gaps analysis to identify priority needs for the qualifying populations. Next slide please.

To better understand the purpose of HOME-ARP funding, we return to the words of Secretary Fudge, who says "Homelessness in the United States was increasing even before COVID-19, and we know the pandemic has only made the crisis worse. HUD's swift allocation of this \$5 billion dollars in American Rescue Plan funding reflects our commitment to addressing homelessness as a priority. With this strong funding, communities across the country will have the resources needed to give homes to the people who have had to endure the COVID-19 pandemic without one." Next slide please.

The vision for HOME-ARP, as created by the Office of Affordable Housing Program (OAHP), is to use the \$5 billion dollars in HOME-ARP funding that is provided to HOME grantees, in collaboration with other community stakeholders, as a chance to make a more targeted, strategic investment in housing and other assistance for people experiencing homelessness and other vulnerable populations.

HOME-ARP can be used to provide rental assistance, fund supportive services, develop new affordable rental housing and acquire and develop non-congregate shelters.

In addition, HOME-ARP's flexibility, especially when paired with other substantial resources for households experiencing homelessness or housing instability, presents a significant opportunity for communities to make critical investments that can build the long-term capacity of housing and homeless systems and dramatically strengthen efforts to prevent and end homelessness. Next slide please.

So, as we think specifically about the agenda for today, we'll focus on each of the steps in the HOME-ARP allocation process. We know that HOME-ARP can't be planned sitting at your desk. HOME-ARP will serve qualifying populations that are different from traditional HOME. So, you'll need to talk to community stakeholders who are knowledgeable about the qualifying populations and also the existing inventory and resources serving those groups now. Also, think about the activities that are underway in the community that HOME-ARP can build on. Through this process, you can identify what is missing and what the most pressing needs of those in the community are. That's the way you can use HOME-ARP most effectively.

So, start with what you already know about your community, and this will come from a lot of the resources that are already available through your con plan, through the ESG CAPER, and then use the consultation process to

help fill out the information about the qualifying populations. Once you have that information through that consultation, you'll be able to do your needs assessment, gaps analysis, and HOME-ARP activities.

And lastly, it's important that you think about how public participation is encouraged throughout this process. And we'll talk a little bit about what the requirements for public participation are as well as some best practices to consider. Next slide please.

So first, thinking about consultation. Although many folks who are on this call may be familiar with consultation as a regular part of the planning process, the consultation required through HOME-ARP is intended really to put a finer point on some of the specifics of the qualifying populations that are outlined in the notice. This will drive the next steps in your local process.

All consultation should be an opportunity for a diverse group of stakeholders to get to the table, but it also provides the opportunity to understand which activities can be most impactful based on your community's specific needs. And this process is really sort of fundamental to the creation of the PJ's allocation plan. Next slide please.

Once you've completed that consultation process, then comes the important part of putting the pieces together through the needs assessment, gaps analysis, and then the identification of the HOME-ARP activities for your community.

These steps require synthesizing information from the consultation and public participation processes to best determine how to allocate HOME-ARP. As you begin the process, consider as we talked about, the data that you already have through existing resources, and those things that you gathered from other resources, including the consultation with the CoC and other homeless service providers. So, wondering about what are the current shelter, housing, and service systems and what are the gaps that exist within those existing systems. And also, what did you learn from the consultation process that can inform priorities?

We know that many communities across the country don't have enough resources, so it then becomes really important to take what you've learned to determine how best to allocate the resources that are available through HOME-ARP. Next slide please.

The last piece of this process, and there is some discretion here in how you approach this, but public participation is supposed to be a significant part of this process. The PJs must provide the public with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan for no less than 15 days.

The PJ must also follow its adopted requirements for "reasonable notice and an opportunity to comment" for plan amendments in its current citizen participation plan. So really important to make sure that you're aware of what your current expectations are. And, at a minimum, PJs are required to make the following information available to the public: (1) the amount of HOME-ARP funds that they will receive, and (2) the range of activities they will undertake.

And so, in thinking about that, the timing of the public hearing is not prescribed, but it is important to think about how best you can gauge public participation. So, you will need to have one public hearing, but, if it makes sense just to make sure that you're actually hearing from folks in the community, then you may consider doing public hearings at different points across the creation of your allocation plan and throughout this process.

And so that's the groundwork for the pieces of the planning, but we'll be digging deeper into each of those pieces. And so, I'm going to turn it over to Joyce to talk about the qualifying populations. Next slide please.

Joyce Probst MacAlpine: Thanks, Megan. We're reviewing the qualifying population information again in this webinar because they provide important context for the consultation process that the PJ must conduct.

As PJs are talking with each of their required consultation partners, they should keep in mind which qualifying populations the consultation partner has information about. Next slide please.

We will go through each of these definitions in the following slides. The most important thing to be aware of here is that Veterans are not a separate qualifying population. They have to meet the definition for one of the four qualifying populations above to be eligible for a project funded with HOME-ARP. Being a veteran alone won't qualify them for HOME-ARP. Next slide please.

So, the first qualifying population is households experiencing homelessness under the definition of 24 CFR 91.5, the ConPlan regulation. There are three criteria under this definition. The first one is households who are sleeping on the street, in a shelter, or a place not meant for human habitation such as an abandoned building. The second criteria are households who are imminently losing their residence within the next 14 days who don't have an alternative place to stay or financial or social networks to support them. And then the third group of households in this qualifying population, are households who meet the homelessness criteria under other federal statutes, this is usually families or unaccompanied youth, and the other federal statutes that include the runaway and homeless youth act and other programs listed at 24 CFR 91.5.

As you're talking with the consultation partners about this qualifying population, think about who can determine that a household meets this definition, and how they might be involved in your referral process. Next slide please.

This qualifying population is not the same as those at imminent risk that we discussed in the last slide. These households are at risk of homelessness but are not considered homeless yet. To be eligible, they must meet a set of criteria that include:

- i. Having an annual income below 30 percent of area median family income, as determined by HUD; AND
- ii. Not having sufficient financial resources or support networks, *e.g.*, family, friends, faith-based, or other social networks, who are immediately available to prevent them from moving to an emergency shelter or another place defined in the "homeless" definition, such as an unsheltered location; AND
- iii. Meets the household must meet one of the following conditions:
 - a. They've moved because of economic reasons two or more times during the 60 days;
 - b. They've lived in the home of another because of economic hardship;
 - c. They've been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days;
 - d. They live in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, state, or local government programs;
 - e. They live in a single-room occupancy or efficiency apartment unit in which there resides more than two persons or they live in a larger housing unit in which there are more than 1.5 people per room;
 - f. They're exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - g. They live in housing that has characteristics associated with housing instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

So, this group obviously is a little more complicated to identify whether or not they're eligible. As you speak with your consultation partners you should keep in mind who is in touch with this group and who might be able to help you determine if people meet the requirements.

And I just want to point out that in the different conditions that are eligible, meeting the requirements for this qualifying population—the last one, the household lived in housing that has characteristics associated with instability and increased risk of homelessness—the PJ can define this, and that is something that can be done in the allocation plan. We'll talk about that further as we talk about the allocation plan. Next slide please.

So, this qualifying population includes individuals or families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual, or the family member, including a child, that has either taken place within the individual or family's, primary nighttime residents, or has made the individual or family afraid to return to their primary nighttime residence.

So, people who are experiencing this kind of violence may have a home, but because of the violence, they are unable to return to that home. So, they are a little different than household who don't have a home. In this case, the violence is precipitating their homelessness.

And so, the other requirements that they have no other residence, besides the primary nightstand residence, and, again, they lack the financial resources or support networks that could help them maintain other housing.

So, it may be that this group needs supportive services more than housing. This is something to discuss with your consultation partners, what this specific group who meet this definition would need that HOME-ARP might be able to provide.

So, there's another aspect to this in addition to the people fleeing various kinds of violence and that is people who are experiencing human trafficking, which includes sex and labor trafficking, which is defined at the citation on the slide. And again, the victim services providers that are part of the required consultation partners will have more information about this. Next slide please.

The last qualifying population actually has two parts, the first one focuses on people who were formerly homeless and who are in need of additional assistance to prevent a return to homelessness. This group might include people who have received time limited ESG-CV or CDBG-CV rental assistance to find housing since the pandemic started and who will continue to need rental assistance to maintain their housing. It may include other groups that, particularly the Continuum of Care (CoC) or nonprofit homeless providers that the PJ needs to consult with, will be gathering information from.

The second part of this qualifying population is focused on people who are the greatest risk of housing instability. These households are either extremely low income and severely rent burdened, which means they're paying more than 50% of their monthly income towards housing costs, or they're very low income—at 50% of area median income or below—and they meet one of the seven at-risk homeless criteria which we mentioned in the second qualifying population. I'm not going to read those again. But again, that is a set of different characteristics, including the last one where the PJ may define other housing characteristics associated with instability and increased housing risk.

Well, thank you and now Meghan will talk about the consultation process. Next slide please.

Meghan Takashima: PJs must consult with agencies and service providers whose clients includes the HOME-ARP qualifying populations to identify unmet needs and gaps in service or housing delivery system. The consultation must be documented in the allocation plan. This will be discussed throughout this section but, when appropriate, the PJ should consider holding a forum to gather information from multiple stakeholders at once. This could start with the creation of a list of potential consultation partners. PJs can then determine how many consultation meetings they would like to hold and strategically group participants.

This process is to identify needs, but not necessarily to discuss specific projects. The allocation plan will require PJs to identify the amount of HOME-ARP funding plan for each eligible activity. So that should be the goal of the consultation meetings.

The key piece of this consultation process is to engage stakeholders. And as part of the process, the PJ should ensure broad consultation with community stakeholders. This can be the starting point for development of HOME-ARP eligible activities and allows the PJ to put together the allocation plan that supports the current effort. The consultation process can also identify potential collaborations for administering HOME-ARP funding, although, as I emphasize above, we really want to kind of keep it high level at this point.

Because this consultation process is so focused on the specific providers who provide services to the qualifying populations, it is different and distinct from the standard consultation process, and so that's why we will kind of dig deeper into what specific request should be made as part of that process and in thinking specifically about who should be at the table, and how best to put together the consultation. Next slide, please.

As PJs begin to start on the consultation process, it's important to consider the needs of households with different demographic characteristics in the planning process. And so, think about the needs of households of different races and ethnicities, and how the plan for HOME-ARP activities can promote equity in the community by reducing disparities for the qualifying populations.

As an example, if black or African Americans are overrepresented in the homelessness system compared to the general population but are less likely to be placed in permanent housing, these types of considerations can be taken into account when it comes time to complete your gaps analysis.

Another key piece here is thinking about when you look at data, as much as possible, disaggregating that data by race and ethnicity to better understand the gaps in the current shelter, housing, and service system and understand how those gaps exist specific to folks of different race and ethnicities.

It's also important to consider how the process can provide an opportunity for diverse community members to provide feedback about the current system. And so that may include persons with lived experience of homelessness or gathering information, like satisfaction surveys, for people who are involved in the homelessness system who maybe has been in shelter or has been in housing specifically targeted to those experiencing homelessness. Next slide, please.

As we think about strategies for effective consultation, part of the information providers bring to the consultation is the perspective of people they serve. PJs may share that expectation with the consultation partner before their meeting to give the provider a chance to gather input from clients. So that is one way to ensure that you have a lot of different perspectives as you're doing your consultation. That's also going to ensure you get the adequate information you need to complete your consultation plan.

As much as possible if you can think about what information you want those that you're consulting with to bring to the table and be clear about the purpose of the discussion, it's going to ensure that the consultation is most effective. Also consider asking service providers to discuss these questions with the households they serve and bring that information.

Consider creating a master template for the consultation that will organize the information you are gathering. This can follow the discussion questions, developed in the guide for the consultation meetings, and later this information can be used to complete the needs assessment and gap analysis. A template has been created to support the consultation process and will be available with this webinar to adapt for your community's needs. Next slide, please.

A couple other big picture thoughts for effective consultation, when appropriate, consider holding a forum to gather information from multiple stakeholders at once. So, as opposed to doing individual consultations with the identified parties here, you can do a larger forum that includes groups that may have some overlap.

So, for example, due to their target population, CoCs, homeless service providers, victim service providers, and Veteran groups could be convened together as they may share some overlap with the folks that they're serving, and the observations and experience they have with the folks who are either experiencing homelessness or at risk of homelessness. It's also possible that Continuums of Care already has a standing meeting that provides an opportunity to capture feedback from multiple stakeholders at once. So, it may make sense to ask if that is the case. Next slide, please.

We are going to walk through some considerations as it relates to each of the identified consultation partners. First, we'll start with Continuums of Care. Next slide, please

So, if you don't have a lot of familiarity with the role of a Continuum of Care, you can refer to one of the earlier HOME-ARP webinars. It was the HOME-ARP: Homeless System Overview webinar. The slides and recording for that webinar may be helpful; it is on the HOME-ARP page and can help you understand more about the specifics of the role of the Continuum of Care.

Very generally, a Continuum of Care is a planning body made up of stakeholders with an interest in preventing and ending homelessness across the defined geographic area. This planning body is responsible for establishing and operating a system to provide crisis and housing services to people experiencing homelessness. And CoC policies and programs are focused on connecting people to housing as quickly as possible and helping people to maintain housing through housing assistance programs.

CoCs are really sort of the primary coordinating body for all things related to a homelessness response. So, they are going to be a key partner, in addition to the requirement to consult with them, you may find them to have a lot of the information that's really essential for you to make decisions about funding.

The CoC components and activities are defined by HUD and the planning body has a requirement to coordinate the multiple types of funding that are available to address homelessness. One other thing that seems important to mention is this system is also responsible for supporting people to prevent a return to homelessness by offering a network of supportive services, and this can include things such as case management, crisis intervention, and connection to mainstream services. Next slide, please.

So, as you think about considerations for consulting with Continuums of Care serving in the PJ geographic region, CoCs understand how best to serve people with the history of homelessness and housing instability and

know the services and supports needed to stabilize people in housing. So that information and knowledge is going to be really beneficial.

Some CoCs have plans developed with community stakeholders identifying and prioritizing the systems housing, shelter, and service needs that can be a starting point for HOME-ARP planning. And those plans may already have identified the gaps or the needs that the community has. They may also have plans for the development, for example, of permanent supportive housing over the course of a number of years, so it really can be kind of a great starting point for the conversation that you have with the Continuum of Care.

It's also important to know that CoCs are responsible for establishing and overseeing coordinated entry systems. And so, if you are planning to use a coordinated entry system as part of the entry into programs, this is an important time to start talking about what that system looks like and how that coordination could exist.

And then, I think it's really important to recognize that are going to have a lot of the data you need about the qualifying populations and this information is collected as part of HUD mandated data submissions. So, those include things such as the point in time (PIT) count, which provides a snapshot of the number of people experiencing homelessness on one night in January, the housing inventory count, which also provides information about the available resources for people experiencing homelessness, and CoCs are going to have that detailed data about the demographics of those experiencing homelessness. So, a lot of the information you need may rest with the Continuum of Care and so that really is the central part of your consultation effort. Next slide, please.

As you prepare for your consultation with the CoC, and potentially other partners depending on how you structure that consultation, some suggested data requests are asking them for information that is available through the homeless management information system or HMIS—a reporting system that all HUD-funded programs must report into—and CoCs can provide HMIS data on who is experiencing homelessness and how the system is serving them; this also can include that information about who is being served and who's remaining homelessness longer.

It's important if you're trying to understand how to target your resources that you asked for the reports that disaggregate this data, both by race and ethnicity, but also thinking about other characteristics, such as gender, veteran status, or specifically thinking about those who are fleeing domestic violence, and household size can also be helpful, and these are all going to help you as you put together your plan to understand what gaps exist in the system.

And the annual point in time count data will highlight trends and homelessness that may help understand, over the course of a number of years, whether the communities that that you're serving are seeing increases or decreases in homelessness. So, there is a lot of information available through the continuum of care. Next slide, please.

The next group that is a required consultation partner is homeless service providers. And again, depending on what works best for the community, you may be consulting with homeless service providers at the same time you are talking to the Continuum of Care. It's really going to vary, but that may be a very useful way to get a lot of information that you need at once. Next slide, please.

Homeless service providers know the needs of people experiencing homelessness. Homeless service providers include organizations, providing street outreach, shelter, transitional housing, and permanent supportive housing. Shelter and housing providers also understand the inventory and service gaps that exist within their

system. Explore whether the service providers also serve those at risk of homelessness and can provide information about the needs of those groups.

Organizations that provide targeted services to specific populations such as veterans or youth, may provide different perspectives and data on the needs of those they serve. Next slide, please.

As you think about data requests for homeless service providers, this is probably drilling down a little bit on the information that you may get from the Continuum of Care, but you can ask for data on the number of people in the qualifying populations that are served by the provider if it's different than the CoC. Also, you may want to ask for data on unmet shelter, housing, and service needs. These could come from project waiting lists or denials because there's not enough space to serve everyone who's requesting services. You can also ask for information on gaps in the current shelter, housing, and service systems, including input from persons experiencing homelessness. And, as we've mentioned, PJs might consider hosting an in-person or virtual meeting to gather this input from multiple stakeholders at once. Next slide, please.

So, another one of the groups that PJs must consult with are victim service providers or VSP. VSP are providers that work with survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking. So, one of those identified qualifying populations. Next slide, please.

One thing to keep in mind is that, due to the confidential nature of victim services work, victim service providers or VSPs, such as domestic violence or human trafficking programs, ask them for the information they've obtained about the qualifying populations that they serve that may not be obtained from other sources. VSPs understand the unique shelter and housing needs with this population.

As you think about who you can invite to the table, suggested participants could include domestic violence hotlines, domestic violence shelters, and housing programs. One option to ensure that you're getting a broad range of perspectives from victim service providers is to reach out to a local DV consortium to identify entities with knowledge to inform your planning. Next slide, please.

As you think, specifically about what data can be helpful from victim service providers, some suggested requests are data on the number of people who need the definition of this qualifying population, data on unmet shelter, housing and, service needs from project waiting lists or service denials, or information on gaps in the current shelter, housing, or service system, including for people fleeing domestic violence. And just a note here is that victim service providers don't enter data into HMIS, so this data will supplement the data that you've requested from the Continuum of Care. Next slide, please.

Another stakeholder that PJs must consult with are veterans' groups. Next slide, please.

In thinking about what groups to bring to the table, in many communities the CoC and the Department of Veterans' Affairs are working closely together; they may have a regular veteran leadership team meeting to coordinate services and coordinate all of the interventions that are available to prevent and end veteran homelessness.

These leadership teams can be excellent sources of information about the number of veterans experiencing homelessness or housing needs and about the current inventory of shelter, housing, and services, or any unmet needs for veterans that may be a priority for HOME-ARP. And as a reminder, although veterans are a qualifying population, they must qualify under one of the other qualifying population criteria. Specifically, we're thinking

about veterans who most likely are either experiencing homelessness, at risk of homelessness, or qualify under one of the other population groups.

If there is a resource available, such as the veteran leadership team, they may be able to share a lot of really useful information about veterans. Many communities have something called a by name list, which is a known list of veterans who are experiencing homelessness, and so there probably are going to be a lot of available resources to help support your planning and your understanding of the gaps that exist for veterans. And if we could move to the next slide.

Some suggested data requests specific to the needs of veterans could include data on the number of Veterans, both in families and adult only households, in the different qualifying populations, data on unmet shelter, housing, and service needs, and information on gaps in the current shelter, housing, and service system for veterans, including input from persons experiencing homelessness.

And again, as we identified above, it may make sense to engage the veteran groups as part of a larger discussion that includes some of the other identified service providers for the qualifying populations. Next slide, please.

The next required consultation that we'll talk about is PJ consultation with public housing agencies or PHAs. Next slide, please.

PHAs know about the needs of families and individuals at-risk of homelessness and housing unstable situations. They can gather this information from their waiting list and from their analysis of public housing needs. They are also knowledgeable about the housing market, including vacancy rates, housing conditions, and rent levels. Their feedback during the consultation process can help inform priorities for HOME-ARP. PHAs can provide information about their current inventory, planned projects, and their current activities. PHAs can also help identify sources of operating subsidy for HOME-ARP affordable housing, such as project-based vouchers and potential collaborations related to product development and/or administration. Next slide, please.

As you think about the data request for public housing agencies, requests can include data on the number of people housed in the PHA's program and the number of people in the PHA's waiting list. You may also request data on voucher utilization rates and information about any barriers to leasing housing units with rental assistance, including low vacancy rates or housing quality issues. If we can go to the next slide.

We'll talk more about public agencies that address the needs of the qualifying populations and this includes mainstream benefit systems. Next slide, please.

In addition to those targeted engagements, PJs are also required to consult with public agencies that address the qualifying populations. And so, in order to do that, it makes sense to identify agencies that provide information about the needs of qualifying populations, and this may include particularly the at-risk and housing unstable populations. In thinking about those agencies, some suggestions are the Department of Community Affairs, the Department of Social Services, the Department of Health and Human Services, the Mayor's Office of Employment and Training and related programs such as One-Stop Career Center, Municipal Reentry Office and related projects, things like Fresh Start@Your Library and Pathway Home, and also affordable housing providers.

This is meant to really reach that at-risk or housing unstable population that may not fully be captured in your consultation with some of the service providers, and this is going to again give a fuller picture of the experience of people who are either homeless or at risk of homelessness, and just help to guide that ongoing planning effort. Next slide, please.

This may be a situation where a joint consultation with identified public agencies can be useful to help get a better picture of service gaps for the different qualifying populations. And these organizations may understand the housing and service needs of other populations requiring services or housing assistance to prevent homelessness or those who are at greatest risks of housing instability who would benefit from HOME-ARP activities. These groups may also know about the needs of people experiencing homelessness who are not well known to the CoC.

So, one important example that many times is going to be a gap in in some communities, is people reentering the community from the criminal justice systems who oftentimes may face greater likelihood of homelessness or housing instability. And so those public agencies are going to help fill out your understanding of all of the different groups that may be at risk of homelessness or housing instability. Next slide, please

As you think about this consultation process and the data that you can request to ensure that this is an effective consultation, think about things like the data on the number and demographics of people and qualifying populations that are served by the agency, new data on unmet shelter, housing, and service needs, this could come from case notes or other sources, and also information on gaps in the current shelter, housing, and service system, including input from persons in the qualifying populations, if that information is available. Next slide, please.

So, the last group that PJs must consult with are organizations that address civil rights, fair housing, and the needs of people with disabilities. Next slide, please.

In thinking about public or private organizations that address civil rights organizations, particularly those representing racial and ethnic groups who are disproportionately impacted by homelessness and housing instability, they understand the causes of housing instability and homelessness, and can provide insight into the community's housing market. They can provide information on how the current shelter, housing, and service systems are serving people they represent, and also provide information on gaps in the current system. So, as you think about what data to request from these organizations think about data on the number and demographics of people in the different qualifying populations and any information on gaps in the current system really across the board from those who are at risk of homelessness to those who are experiencing homelessness, as well as those who may be housing insecure. Next slide, please.

In addition, PJs are required to consult with public or private organizations that address fair housing. Fair housing agencies understand the causes of homelessness and housing instability and can provide information that fully increases the understanding of the communities' housing market. Fair housing agencies may also know about gaps in the current system and can identify the need for HOME-ARP activities, such as supportive services.

As you think about the data to request from these organizations, think about data on the number and demographic characteristics of people in the different qualifying populations, and information on gaps in the current shelter, housing, and service system. And PJs should also consult their most recent AI or AFH for an analysis of fair housing needs that could inform the needs assessment. Next slide, please.

Lastly, as part of the consultation process, PJs must consult with organizations that address the needs of persons with disabilities. And again, they may have a really specialized understanding of the specific housing needs of people with disabilities who also are part of the qualifying populations. And so asking them for data on the number and demographic characteristics of people with disabilities in the different qualifying populations, as

well as any information they have about overall system gaps, or housing market characteristics for people with disabilities can be useful in putting together your allocation plan.

And so that is the full scope of the consultation process and those entities that you must consult with. I'm going to turn it back over to Joyce to talk about the development of the HOME-ARP allocation plan.

Joyce Probst MacAlpine: Thanks, Meghan. So now we're going to talk about some of the steps in developing some parts of the allocation plan. We're going to illustrate this process using the optional template HUD provided when the notice was released. PJs can develop their own Allocation Plan format but should carefully review the information required for inclusion in the Allocation Plan to be sure the Plan is complete before submission to HUD in IDIS. Next slide please.

In this webinar, we're going to focus the most attention on the consultation, needs assessment and HOME-ARP activities portion of the plan. Additional TA resources will be made available soon about how to submit the plan in IDIS. Next slide.

The PJ must describe the consultation process they've gone through, including listing the organizations they consulted and the feedback that was received. In order to confirm that the required consultations have taken place under the type of agency/organization column in the template the PJ should clearly label the type of organization using the language provided in the notice so who they consulted with can be tied back to the required categories of consultation partner.

The PJ needs to provide a summary of the feedback that they received from each consultation partner and maybe PJs should consider creating a master template for the consultation process that organizes the information they're gathering. This could follow the discussion questions in the discussion guide template provided with this webinar and that that can be used to complete this feedback section and other portions of the needs assessment.

PJs must also describe the public participation process, how they attempted to broaden public participation through outreach. They need to summarize the comments they received, and whether they were accepted or not. Note that in many cases, the PJ won't have the public participation process information until the end of the planning process, when they consult, after they've consulted with the required stakeholders, conducted their needs assessment and gaps analysis, and develop the draft allocation plan.

We're discussing the optional allocation plan template here. And that includes information about the consultation process, which is happens at the beginning of the planning process and the public participation process which usually that happen at the end. All of that is described in the first section of the template. Next slide please.

The needs assessment and gap analysis is really the heart of the allocation planning process where everything PJs learned from the data and from conversation with consultation partners gets integrated into an understanding of the priorities that HOME-ARP should address. Next slide please.

For the needs assessment, the PJ must describe the needs of the qualifying populations in the plan, including the size of the qualifying populations by household type and some characteristics, including veteran status and whether they're fleeing domestic violence. It is also recommended that this information include data on other demographics for each of the qualifying populations so you can understand who isn't being served and how HOME-ARP can be targeted to address some of those disparities.

PJs also need to report on gaps in the community shelter and housing inventory and service delivery system, and characteristics of housing associated with instability and increased risk of homelessness if the PJ will include such conditions under HUD's definition of at risk of homelessness or other populations. Identify the PJ's priority needs for the qualifying populations and explain how the PJ has determine the level of need and gaps in the shelter and housing inventory and services delivery system. In addition to providing the information needed for a gaps analysis, this information will be used to determine if there are any qualifying populations or subpopulations that should be identified for a preference for HOME-ARP. Next slide please.

This chart is from the optional allocation plan template provided with the notice. We will go through this chart section by section talking about possible sources of data PJ can access to complete the charts and considerations for the needs assessment and gaps analysis.

The first section is about the community's current shelter and housing inventory. As the PJ has consultation discussions, they should ask about current and planned inventory for each of the required project types. Next slide please.

This chart is from the optional allocation plan template provided with the notice. For each household type the PJ must list the number of beds or units for these three different project types. In the homeless system, usually shelter inventory is counted as beds and the housing inventory is counted as units. PJs might adopt that convention here to make it easier to identify whether the gaps in the system are for housing or shelter when they're conducting their gaps analysis.

Note that I added an additional column to collect data about the number of units available for veterans that column wasn't in the optional template. Communities usually have substantial housing resources for veterans that should be captured as part of the planning process to help inform the gaps analysis.

Also, CoCs may provide information about one other permanent housing project that's not included in the optional template. This housing project called rapid rehousing provides temporary financial assistance which helps people find and get established in housing. This project type is like HOME TBRA. PJs may want to gather information about rapid rehousing inventory in their community to identify whether there is a gap in this kind of housing resource.

To find this data PJs can ask CoCs for their housing inventory chart, which they must submit to HUD annually. CoCs recently submitted their housing inventory account or HIC that they had on the point in time count day in January of 2021. You can ask the CoC about any recent or planned changes to their shelter and housing since the data for the HIC was collected. Next slide please.

The next portion of the chart is information on the number of households experiencing homelessness. CoCs can produce this data from the homeless management information system, or HMIS. They need to produce several kinds of reports some of which are submitted to HUD and some of which are used on the local level. PJs can request that the CoC helps them complete this chart using their HMIS data.

If the CoC isn't able to do this, the PJ can ask the CoC for data from two reports submitted to HUD. The point in time count that happens one night in January that includes everyone in shelter, or on the street on that night. And the Longitudinal System Analysis report on people served in different shelter and housing programs where the data about those programs was entered into HMIS. This is an annual count that doesn't include people who are unsheltered if they weren't also served in those programs, and the PJ should consult with the CoC about who isn't included in this report.

In addition to the CoC reports the ESG CAPER may also have vital information on people served in shelter. PJs should consult their local ESG administrators about this data. Next slide please.

This chart is from the optimal allocation plan template provided with the notice. A few notes here, there are no perfect counts, communities have incomplete information about who is experiencing homelessness and reports can provide the best estimate which can give you a sense of the greatest unmet needs. During the year some households will be sheltered and unsheltered at different points in the year so there may be some double counting as households move between various parts of the homeless system.

As we look at this chart, you want to gather as complete information as possible for family households, which include at least one minor child, and adult households, which are one or more adults together without any minor children. And then have the veteran households and victims of domestic violence or human trafficking households be a subset of these two main household types, family households and adult household. The gaps analysis is conducted at the family and adults only household level, so it is important to ensure that those are as complete counts as possible.

While this chart doesn't include additional demographics breakdowns for race, ethnicity, and age this might be the stage where you want to where you would want to collect that additional data and review it to understand who's being served and who isn't and where HOME-ARP might be most impactful. Next slide please.

Now, we turn to data on inventory for the other qualifying populations. In addition to the information about rental housing in the PJs jurisdiction that is suggested to be collected in the optional template, we should think broadly about how the housing market is contributing to homeless and instability in the community. For example, communities with a low vacancy rate might find that a TBRA strategy might have limited success because of the low number of rental units available to house people with TBRA assistance. In that case housing production might be more impactful.

Or another example, if consultation with partners share that people with full time jobs are sleeping in their cars because even with full time employment, they can't afford housing. Then housing affordability may be a huge driver of homelessness and a TBRA strategy might be effective if there are enough units available for rent in the community.

So, the data that should be collected is the overall number of rental housing units, number of units affordable to households with different income levels, the rental vacancy rate. Some other questions to think about for your housing market. How many renters are rent burdened? How old is the community's rental housing? In what types of buildings are rental housing units located? What's the condition of that housing stock? How long is the waiting list for existing subsidized housing - which the PHA may be able to provide information about. And are any changes in the affordable rental housing stock expected in the next couple years due to expiring use or other issues. Next slide please.

This chart is also from the optional allocation plan template. I have added a new line here to capture the rental vacancy rate to help local decision making about HOME-ARP. You may want to add other columns or rows here to collect some of the other information about your housing market to help the needs assessment. The data required here about rental units affordable to households at various income limits should include both subsidized and non-subsidized housing affordable to people at those rent levels. This information can be found in the Comprehensive Housing Affordability Strategy report, or the CHAS report and you also can find information about the overall rental housing market in the American community survey. Some of this data may

have already been collected in the PJ's consolidated plan. PJs should make sure that the data they're using is up to date as possible when they're completing this chart. Next slide please.

So, the next pieces of information are about the number of households who are having housing instability according to the various qualifying populations definitions. The two sources, the American Community Survey and the CHAS, can help provide this information about households. You may also find that your previous planning process can help provide support and if you have local housing developments the developers may have market studies about the housing needs of people in the community. Next slide please.

This is again from the optional allocation plan template. The severe housing problems defined in the CHAS and listed here are incomplete kitchen facilities, incomplete plumbing facilities, more than 1.5 people per room and cost burden greater than 50%. So, this data that's being requested would be for households to at the different income levels who have one or more of these severe housing problems. This isn't a complete match to the other populations and greatest risk of housing instability qualifying population but it's probably the best data available to give you a sense of the number of households who are in that qualifying population.

The consultation partners can also tell you about people in the qualifying population who aren't homeless including nonprofits administering the emergency rental assistance program and other homelessness prevention programs. They can tell you how many applications that have come in and whether there's a gap in community resources that might inform the gap analysis for. Next slide please.

The optional chart plan template only covers some of the information you might need to be able to do a complete needs assessment. So other information you might want to document as part of the consultation process and needs assessment is the number of family, and adult only household who are currently housed with emergency or temporary assistance who were homeless before and who may need HOME-ARP resources to remain housed. This is the first part of the other qualifying populations, and they may have information about that group. They may also know of or there may be other providers in the community who are requesting prevention services that would inform both the second qualifying population that are at risk of homelessness and the second group of the other population qualifying population who are at greatest risk of housing instability. Next slide, please.

In addition to understanding the current inventory, and the number of people who are experiencing homelessness are housing instability. PJ should gather information on the other resources available to assist the qualifying populations. The various emergency rescue bills that have been passed in response to the public health emergency have brought in a lot of new resources to communities. Through the consultation meetings, PJs should get an understanding of what resources have already been implemented in the community and what resources will be implemented soon that may address some of the shelter, housing or services needs identified for the qualifying populations.

These new resources include emergency solutions grants from the Cares Act ESG-CV which fund that rapid rehousing, homelessness prevention and shelter. Emergency housing vouchers administered by the PHA. Emergency rental assistance program funding from the United States Treasury that can prevent evictions and address homeless needs. And other state and local resources for shelter, housing, and services, that might have been made available to communities because of the public health emergency. This information can help address where there are gaps in resources in addition to the current inventory that's available in the community. Next slide, please.

So now that you have this needs assessment information, you can conduct the gaps analysis, which would look at any gaps in the shelter and housing inventory and the service delivery system taking into account what's currently available, any new shelter, housing or services that will be available soon, and the other resources in the community. You also may identify preferences that will be established among the qualifying populations in this process. So next slide, please.

This is also from the optional allocation plan template. As PJs are completing this they may want to make sure that they're looking at shelter and housing needs separately. So, as suggested earlier, often shelter is counted as number of beds, and housing is counted as number of units. If you've made that distinction in the needs assessment, then you may be able to carry that into the gaps analysis for homeless households and look at the number of shelter beds that are needed in the number of housing units that are needed. Remember, if you look at gap in shelter beds that HOME-ARP can only find non-congregate shelter. If you're identifying a gap in shelter in the community, make sure you're incorporating the information from your consultation partners about the type of shelter that's needed as you develop priorities from these gaps analysis.

For the non-homeless needs the number of households that have a housing need, because if they're not homeless there would be no shelter need, is seen as the gap between the current inventory of housing and other resources such as in the emergency assistance program, which can provide prevention resources to help households not lose their housing, and the level of need the number of households who have some sort of housing need that has been identified through the needs assessment. Next slide please.

So now we are moving from collecting and analyzing the data into developing a plan. PJs will probably find that the community needs everything that HOME-ARP can fund because there is such a gap in the homeless system and in affordable housing in the community. The priorities identified from the consultation partners can help focus planning on activities that will have the greatest impact for the qualifying populations. So, PJs, as they're moving from their needs assessment and gaps analysis to planning the HOME-ARP resources, should be looking at the full picture and not just the charts in the optional template or charts that they've created, and the housing market analysis can help identify which activities would be the most impactful. Next slide please.

So, moving on to actually planning the activities next slide. Please um. The PJ can look at their need assessment and gaps analysis for the different qualifying populations to determine the activities that would best meet their needs. PJs will have to provide a clear rationale that connects with gap analysis and the priorities that they've identified in the consultation process with the planned activities. But this just at the activity level at this point. PJs don't have to describe specific projects although if they have that information that can be included. But the only requirement here is to plan the HOME-ARP resources into the broad activities allowed in the statute and the notice.

Once the PJ has identified the activity or activities they want to fund with HOME-ARP they need to determine how much of their HOME-ARP award they will allocate to each activity as well as to administration and planning and nonprofit operating and capacity building. The PJ must state how it plans to distribute funds for each activity. PJ can use different methods of distribution for different activities, or even different methods of distribution for the same activity. Next slide, please.

Again, this is from the optional allocation template. PJs do not have to allocate HOME-ARP resources to every activity. They can focus it on the ones that have been identified through the gap analysis and through priority setting. But they do need to make sure that the percentage allocated to nonprofit operating and capacity

building and to planning and administration don't exceed the statutory limit. And that the total for all the activities doesn't exceed the allocation. Next slide, please.

So, PJs once they have identified which activities they are going to provide, if they are going to produce housing as one of their activities, they must project the number of units that will be created. Next slide please.

So, PJ should estimate the number of affordable rental housing units for households in the qualifying populations that a PJ will produce or support and describe the goal that they're trying to achieve. This can be an estimate at this point before projects are identified. Next slide please.

And the last part of the allocation plan we are going to discuss today is preferences. Next slide, please.

PJs have the ability to identify a preference for one or more qualifying populations or sub population of a qualifying population for any eligible activity or project. They need to explain how the preference will address unmet needs consistent with the needs assessment and gap analysis. For example, the needs assessment and gaps analysis may have found that there are no gaps in the community shelter and housing inventory for literally homeless families. But there are gaps for single adults. So, the PJ could establish a preference for shelter or housing or both that target single adults who meet the homeless definition for the qualifying population.

PJs are not required to establish preferences among the qualifying populations. If they don't establish a preference, then all people in the qualifying populations would be eligible for HOME-ARP projects. They don't have to describe the specific projects to which preferences would apply. Preferences may not violate fair housing, civil rights or nondiscrimination requirements. If the PJ does provide a preference for one or more qualified populations or a sub population of a qualifying population, they also need to address how they're going to meet any unmet needs or gaps in the other qualifying populations not included in the preference.

So, think as PJs are establishing their preference, they might also want to think about how households are going to be identified for projects. For example, for PJ is establishing a preference for a homeless population. They may want to work with their local continuum of care to use the continuum of care's coordinated entry system that may already have an existing prioritization process. The PJ should work with the continuum of care to understand the coordinated entry prioritization and if the prioritization doesn't reflect the preferences and the allocation plan work with the continuum of care to update their coordinated entry prioritization process for HOME-ARP.

Other resources on coordinated entry and HOME-ARP will be available in follow up materials. Now I'll turn it back to Megan to talk about the public participation process.

Meghan Takashima: Thank you Joyce, so, in thinking about the public participation process, it's important to consider timing for public participation. PJs need to have the public participation process after they have a sense of the qualifying populations from the consultation partners so they can propose initial allocations of HOME-ARP to the eligible activities, but it can't be so late in the process that the plan is complete and the public doesn't have a chance to impact the final decision. Remember that you must follow any adopted requirements for reasonable notice and opportunity to comment for plan amendments via your current citizen participation plan and you should use that plan to inform the timing about when you'll hold public participation and other timing decisions as well. Next slide, please.

Public participation requirements to gather citizen input, the HOME-ARP notice requires that PJs do the following. First, to provide notice and a public comment period of no less than 15 days. Second, to hold at least

one public hearing during the development of the plan. And third, to provide the amount of HOME-ARP the PJ will receive and the activities the PJ is proposing to undertake.

It's important to note that HOME-ARP public participation processes must be consistent with the community's citizen participation plan. However, the ConPlan regs at CFR 91.105(c)2 require a 30-day comment period, whereas HOME-ARP requires minimally a 15-day period. A best practice for citizen input is to share the information learned through the consultation process, the needs assessment and gaps analysis results, and the reason for proposing the identified activities and the allocation plan. However, in order to implement these and other best practices, it would be important to have more than one public hearing, which is not a requirement of the notice. Next slide, please.

As PJs consider the comments that are made, because it's expected that the public comment period will provide a summary of all the comments. Remember that PJs are not expected to accept every comment that is provided during this process. It's understood that there are a wide range of viewpoints held by the public with different opinions and concerns, but it is the PJ's job to use the information they've already gotten through the consultation process to balance the viewpoints in the comments that are received and respond to the comments in a way that lets the public know that it's views were taken into consideration during the planning process. In addition, the allocation plan must describe the public participation process, including any efforts that the PJ made to broaden public participation. Next slide please.

And so there are a number of strategies to increase public participation. There are some links here specifically through the citizen participation and consultation toolkit that can be really helpful in maximizing public participation, and also looking at some of the best practices in consolidated planning. And so PJs are strongly encouraged to review these materials as they think about how they will maximize public participation. But specifically calling out some best practices, thinking about strategic publication can be really helpful to engage residents who experienced housing instability or homelessness as well as persons with disabilities and those with limited English proficiency. So, one option to increase input from people of different races and ethnicities is to expand beyond standard publishing requirements and share on social media platforms as well as targeting culturally specific publications for your publication of the notice, also translating the notice and other materials into languages commonly spoken in the geographic area can be helpful in ensuring broader public participation. Consider asking community stakeholders to share via their newsletter or other platforms, particularly some of those identified consultation partners, such as the CoC or homeless service providers. And then another consideration is thinking about being able to ensure that everyone can get to the table. So, in light of COVID related concerns, it may make sense to offer public hearings in both virtual and in person format so that you can reach anyone who really wants to make sure that their voices are heard.

So, all of these are essential pieces of the public participation process and again, as we've encouraged the more broadly you can engage the public in this conversation the better your processes are going to be, the more transparent they are. And so it's important to make sure that you are as broadly as possible ensuring public participation. Next slide please.

So, this is the end of the webinar. Additional training resources for HOME-ARP are being developed. As you can see here, you can send questions about HOME-ARP to HOMEARP@hud.gov. Also strongly encourage you to visit the HOME-ARP home page to see new materials as they're being published. So, thanks for joining.