

The HOME-American Rescue Plan (HOME-ARP) program (see [Notice CPD-21-10](#) for details) is a housing program funded by the American Rescue Plan. The American Rescue Plan provides \$5 billion to the 651 State and local Participating Jurisdictions (PJs) to assist qualifying populations (QPs), which include individuals and families experiencing and at-risk of homelessness, by providing rental housing, supportive services, non-congregate shelter, tenant based rental assistance (TBRA), and non-profit operating and capacity building. If you don't know about the participating jurisdiction in your area, a crosswalk of PJs, CoCs and ESG recipients can be found [here](#).

HOME-ARP has numerous differences when compared to the annual HOME allocation, many of which may not be familiar to all PJs (e.g., the qualifying populations and the eligible activities). Due to these distinctions, PJs are required by HUD to gather and analyze data to better understand how these resources can meet community needs before determining how they will allocate their HOME-ARP funds. The [HOME-ARP Notice Review Webinar Series](#) reviews the content of the Notice and explains what is required of PJs to access the HOME-ARP funds and provides further details about the qualifying population and eligible activities.

The Strategic Opportunities Created By HOME-ARP

When paired with other resources made available through the CARES Act and the American Rescue Plan, HOME-ARP presents a historic investment in housing and other activities that can end homelessness or housing instability for households in the qualifying populations. However, a strategic allocation of the resources is necessary to ensure it has its intended impact. As outlined in the Notice, PJs are responsible for submitting an allocation plan to HUD. As part of that process, they must gather input from various stakeholders in their community to:

- Identify unmet needs and gaps in the shelter, housing, and service delivery system for the QPs
- Assess priorities for HOME-ARP eligible activities

As a required consultation partner, CoCs can influence this process by providing data that helps to demonstrate gaps, as well inequities in impact and outcomes for Black, Indigenous People of Color.

Entities PJs are Required to Consult With

As detailed in the [Notice](#), PJs are required to consult with:

- Continuums of Care (CoCs)
- Homeless Service Providers
- Domestic Violence Service Providers
- Veterans' Groups
- Public Housing Agencies (PHAs)
- Public agencies that address the needs of the qualifying populations
- Public or private organizations that address fair housing, civil rights, and the needs of person with disabilities

Qualifying Populations

The populations that are eligible for HOME-ARP funds are limited to:

- Those experiencing homelessness, as defined by 24 CFR 91.5
- Those at-risk of homelessness as defined by 24 CFR 91.5
- Those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking as defined in 24 CFR 5.2003 and TVPA, 22 U.S.C. 7102
- Other populations for whom providing supportive services or assistance under would prevent the family's homelessness or would serve those with the greatest risk of housing instability (refer to the notice for further details)

***Note: Veterans and families that include a Veteran family member must also meet one of the preceding criteria above**

Home-ARP Eligible Activities

- Rental Housing
- Supportive Services
- Non-Congregate Shelter
- Tenant Based Rental Assistance (TBRA)
- Non-profit Operating and Capacity Building

Please refer to the [fact sheets](#) created by the HUD Office of Affordable Housing Programs for more details on each activity

CoC Preparation for Consultation with PJs

The consultation process creates an opportunity for CoCs and other organizations to provide meaningful input on gaps in the community's shelter, housing and service system, possible priorities for HOME-ARP, and to build partnerships with PJs. Other benefits of this consultation process include the possibility of identifying collaborations that could increase the financial and operational viability of eligible activities as well as the opportunity for the PJ to assess the willingness and capacity of organizations with which they may not have previously collaborated to engage in HOME-ARP activities. CoCs can prepare for the consultation with PJs by partnering with lived expertise boards or groups to ensure meaningful input for those with personal experience of homelessness. The Notice also requires PJs to have a public participation process including at least one public hearing. This is an opportunity for stakeholders that want to be heard to provide public comments for the PJ to hear and respond to as part of their allocation plan.

Provide Data and Information to Communicate System Priorities

Questions to ask yourself before the consultation meeting with the PJ to help ensure HOME-ARP funds are being used strategically:

- What gaps are there in the shelter, housing, and services system for the qualifying populations?
- What are the community's priorities for new resources?
- Are there groups within the qualifying populations that have particular needs that should be considered for a preference?
- What qualitative information is available (through focus groups, satisfaction surveys, etc.) about gaps in housing, services and accessibility for groups who are overrepresented in your homelessness system?
- Which HOME-ARP eligible activities can't be funded with other sources of funding (see Making the Most of Federal Resources to Stop Increases in Homelessness)?
- What unmet need(s) exist that current funding can't address?

Other Considerations for CoCs as they prepare for consultation with PJs:

• **Do Your Research: Be Aware of PJ's and Jurisdiction's Priorities**

It is important to be aware of the PJ's and jurisdiction's existing priorities (ex. focus on the specific neighborhoods within their territory) while framing homeless system priorities. Taking their priorities into account can help the consultation process be more productive. Documents to refer to support your understanding include the PJs Con Plan, most recent Annual Action Plan, CV substantial amendments, the ESG written standards (if applicable) and the most recent CAPER report.

• **Help PJs Understand How Effective Targeting Can Move the Needle on Ending Homelessness**

There are a variety of qualifying populations for these funds. It is important to help the PJ understand how serving those experiencing homelessness can meet local priorities and help them address local challenges.

• **Provide Useful Data and Information on System Gaps**

First, ask if there is specific data or information that would be helpful to the PJ as they plan to allocate HOME-ARP funds. If there aren't specific requests, be prepared with:

- Multi-year PIT data
- HIC data
- Annual data on who is experiencing homelessness, and how the system is serving them. Disaggregate this data by race, ethnicity, gender, household size and differing abilities, and look at the specific characteristics of subpopulations (such as those fleeing DV and Veterans) to understand gaps in the service system
- Available information about unit availability, cost, and quality
- Refer to this [series of documents](#) for support in analyzing local data

- **Suggest how HOME-ARP can be Used to Fill Gaps and Build Upon Existing Projects**

CoCs can also provide information about how HOME-ARP can fill gaps to meet the community needs. HOME-ARP activities can be targeted towards gaps that can't be filled with existing resources. For example, a PJ can use HOME-ARP to fund the development of rental housing which can be paired with CoC-funded services, effectively creating a Permanent Supportive Housing (PSH) project. HOME-ARP funds can also be used to build upon existing projects. For example, a community can pair HOME-ARP rental housing with a PSH subsidy down the road.

- **Prepare to Explain Coordinated Entry**

Provide information about how coordinated entry (CE) can help identify and refer people that are eligible for the selected HOME-ARP project. Demonstrate how CE can be expanded to include HOME-ARP projects. This is extremely important if you'd like the HOME-ARP to use the local CE process to fill units to be developed. Pages 10-11 of [Notice CPD-21-10](#) provide additional information on strategies and requirements for PJs if they elect to use CE for project referral and would be helpful to review prior to the consultation.

- **Emphasize the CoC and Provider Expertise on Serving the Qualifying Populations**

CoCs and homeless system providers' knowledge of the qualifying populations make them valuable partners in ensuring HOME-ARP projects are successful. Explain the specific services and experience that service providers and rent administrators use to help people in the qualifying populations get and keep housing.

Continue the Relationship Building After the Consultation

After the PJs has completed the consultation with providers, keep in touch and think about ways that the PJ can continue to be an active participant in your planning process. This will vary based on your CoC structure and identified HOME-ARP activities but ideally you have a way to check in regularly on the projects in motion and how the CoC can support these efforts. Engage the PJ in the CoC's planning process even after HOME-ARP resources are committed to ensure they are taking the needs of households experiencing homelessness into account as they plan for HOME activities. Remember that diverse perspectives that include people with lived expertise of homelessness are important to address some of the challenges that may exist in accessing housing and programs supported through HOME-ARP.