

HOME-ARP: Preferences, Methods of Prioritization, and Limitations



HOME-ARP allocation plans must address the housing, shelter, and service needs and gaps of each Qualifying Population (QP). However, a Participating Jurisdiction (PJ) may establish reasonable preferences and limitations to serve those with the most acute needs.

Preferences

Preferences establish the order in which applicants are admitted to HOME-ARP activities and projects by permitting a qualifying applicant to be selected for assistance before other qualifying applicants based on characteristics identified in a PJ's allocation plan.

Preferences:

- Are optional
- Do not make anyone eligible who was not otherwise eligible
- Do not exclude or remove the eligibility of any QP
- Must be identified in the allocation plan
- Are based on the results of the needs assessment and gaps analysis

Example: A PJ requests applications for projects that will serve all QPs but gives additional points to projects that will implement a preference for HOME-ARP Homeless QPs.

Methods of Prioritization

A **method of prioritization** is the process by which a PJ and their partners determine how eligible QP applicants, qualifying for the same or different preferences, are selected for a HOME-ARP activity or project.

Methods of prioritization:

- Are only permitted if preference(s) are established

If preference(s) are not established, QP applicants are selected from a waiting list in chronological order.

Example: A rental project adopts a preference for chronically homeless (CH) households. CH applicants are selected based on length of time they have been homeless.

Limitations

Limitations exclude certain QPs or subpopulations of QPs from eligibility for a project or activity.

Limitations are not permitted unless:

- It is necessary to address a specific gap in housing or services in the PJ's geographic area
- The PJ cannot address that specific gap in housing or services by using a preference
- The excluded QPs are permitted access to other HOME-ARP activities or projects

Example: A non-congregate shelter (NCS) limits admission to individuals and families that qualify under the Domestic Violence/Sexual Assault/Trafficking QP.

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In their allocation plans, PJs must:

- ✓ Explain how PJ will provide all four QPs with access to HOME-ARP projects and activities. Access means all four QPs are eligible to apply for or be referred to *at least one* HOME-ARP project or activity.
- ✓ Clearly identify whether preference will be given to one or more QPs or a subpopulation of QP (PJs are not required to describe the specific projects preferences will apply to).
- ✓ Provide rationale for and explain how the preference will address a pressing need or gap identified through consultation and the needs assessment and gaps analysis.
- ✓ Not violate any applicable fair housing, civil rights, and nondiscrimination requirements.

Best Practices



Confer with your field offices' Fair Housing and Equal Opportunity (FHEO) Division to ensure identified preferences do not violate fair housing laws



Discuss with your partners the best process for providing access to different activity types before making a determination about implementing or not implementing preferences



Work with your CoC to identify a process to expand the Coordinated Entry (CE) system to all four HOME-ARP QPs before determining that HOME-ARP Expanded CE will be used as a direct referral method for any projects or activities

Avoid these common mistakes:

- ✗ Describing a project selection process, including published NOFAs or RFPs, that implement a preference not described in the plan (e.g., bonus points for permanent supportive housing projects that serve the literally homeless)
- ✗ Using the CoC Homeless definition (paragraphs 1-4) instead of the HOME-ARP definition (paragraphs 1-3)
- ✗ Describing activities, projects, or programs targeted to a specific QP (e.g., people experiencing homelessness) or subpopulation of a QP (e.g., people experiencing chronic homelessness or homeless veterans) but stating that no preferences will be established.
- ✗ Instituting a preference that violates fair housing and civil rights requirements. For example, establishing NCS that will only serve women and children
- ✗ Stating that CE will be expanded to all HOME-ARP QPs and used for direct referrals but stating no preferences and methods of prioritization will be used. Note: CE systems implement inherent preferences and methods of prioritization in the assessment and referral process. If you plan to use CE for direct referrals, you are instituting a preference and method of prioritization that must be described in your plan