

# HOME-ARP Allocation Plan Template

## Guidance

- To receive its HOME-ARP allocation, a PJ must:
  - Engage in consultation with at least the required organizations;
  - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
  - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
  - Affirmatively Further Fair Housing;
  - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
  - Anti-Lobbying;
  - Authority of Jurisdiction;
  - Section 3; and,
  - HOME-ARP specific certification.

**Participating Jurisdiction:** King County

**Date:** 4/4/2022

## Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

### ***Summarize the consultation process:***

King County consulted with nine organizations/agencies across all the required stakeholders. These consultations occurred between November 2021 and February 2022 and were conducted via remote Teams meetings.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<b>King County Regional Homelessness Authority (KCRHA)</b>	Continuum of Care; newly established regional (King County and Seattle) body to address homelessness holistically.	Remote meeting 11/29/21	Allocating HOME-ARP funds for capital purposes, to support development of new PSH housing and new non-congregate shelters makes sense. There is significant need for PSH and shelter units throughout the County to serve homeless populations that have been under resourced from a capital perspective. Proposed approach makes sense – will advance the construction pipeline and provide shelter and permanent supportive housing for homeless.
<b>King County Housing Authority (KCHA)</b>	Housing Authority	Remote meeting 12/22/21	Supports funding the proposed PSH and shelter projects. Asked County to consider allocating some resources for housing stability services or for capital for another PSH development project.
<b>Renton Housing Authority (RHA)</b>	Housing Authority	Remote meeting 2/4/2022	Development of new units, operations, and services are all priority needs. Development and ongoing operating costs, specifically insurance and staffing, are rising. Supports prioritizing these funds for capital purposes and continuing to balance needs for capital and operating/services resources.
<b>Coalition Ending Gender Based Violence</b>	Nonprofit organization addressing domestic violence	Remote meeting 2/7/22	Coalition of more than 40 diverse member organizations in King County working to end gender based violence. Housing and shelter for survivors of domestic violence is a critical need. Highly supports allocating funds to both the DV shelter on the Eastside as well as the proposed non-congregate shelter in South King County, where shelter is much needed. Notes that shelters not specifically focused on serving DV survivors, do serve high percentage

			of DV survivors. Cited one shelter that, while not prioritized as DV, 50% of their residents are DV survivors. And another shelter reports that 30%-40% of their callers are fleeing DV. Glad to see these funds supporting DV shelter and shelters more broadly.
<b>King County Adult Services Division (ADS)</b>	Local government agency managing the majority of King County's Veteran services	Remote meeting 2/7/22	Meeting included King County teams focused on homeless Veterans, including Veteran Operations Leadership Team (VOLT) and Veteran's Initiative team. HOME ARP funds are a good match for homeless Veterans. Support allocating funds for PSH serving some homeless Veterans. Consider the service level PSH projects provide for Veterans, make sure they are providing appropriate services. Look at pairing funds with HUD VASH vouchers to ensure case management.
<b>King County Behavioral Health and Recovery Division (BHRD)</b>	Local government agency	Remote meeting 2/9/22	Agency works with qualifying populations at high risk of housing instability, including those with mental and behavioral health conditions and substance use issues. Supports HOME ARP allocation proposal prioritizing homeless housing (PSH) and shelter. Raised concern about coordinated entry system (CEA) not prioritizing clients they serve, those stepping down from behavioral health or health care facilities. Encouraged funding for non-PSH affordable housing serving those with behavioral health conditions, and potentially connecting with PACT (Program for Assertive Community Treatment) which provides wrap-around services.
<b>Fair Housing Center of Washington</b>	Nonprofit agency providing fair housing	Remote meeting 2/11/22	Supports use of HOME ARP funds for capital purposes – development of shelters and affordable housing. There is high need for non-

	education, outreach, and enforcement services.		<p>congregate shelters throughout King County and the State.</p> <p>Ensure that affordable housing developers using these funds create and implement affirmative marketing plans. Any opportunity to provide developers with fair housing training? Also, ensure that new developments are located near amenities (businesses, parks, hospitals) that will help residents thrive.</p>
<b>The Arc of King County AND Alliance of People with Disabilities</b>	Nonprofit agencies serving people with disabilities	Remote meeting 2/23/22	<p>The Arc of King County serves people with intellectual and development disabilities. The Alliance of People with Disabilities is the Independent Living Center for King County, providing a variety of services to people across a range of disabilities.</p> <p>Housing system is not serving people with Intellectual and Development disabilities the way it needs to. Where can we improve? Homeless housing and CEA is focused on behavioral health and substance use conditions. And people with I/DD are not prioritized if not homeless. Current model typically supports small I/DD group homes. We need to scale up and integrate needs and housing to accommodate people with full range of disabilities, including I/DD.</p> <p>Support the proposed HOME ARP allocation plan, three identified projects will support people with disabilities. 64% of the unhoused have at least one form of disability. And also encourage us to support housing that serves a broader spectrum of disabilities in, not just behavioral health disabilities.</p>

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

## Public Participation

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

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

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

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

- **Public comment period:** start date - 4/4/2022 end date - 4/18/2022
- **Public hearing:** 4/15/2022

To be completed after public comment period

*Describe any efforts to broaden public participation:*

King County’s Housing, Homelessness and Community Development Division (HHCDD) conducted outreach to key stakeholders from November 2021 through February 2022. Stakeholders included the CoC, homeless and domestic violence providers, public housing authorities, public agencies addressing the needs of Veterans and other qualifying populations, and nonprofits addressing fair housing and the needs of people with disabilities. In these meetings King County asked stakeholders what the most pressing housing needs are for homeless people or those at greatest risk of homelessness. King County shared a draft HOME ARP Allocation Plan, which identified three capital projects prioritized for funding and a balance that would be prioritized in the 2022 housing capital funding round, and asked stakeholders whether these priorities align with the needs they are seeing, or where there may be gaps.

King County also sent a notice to more than 180 organizations/agencies, including affordable housing developers and homeless service providers, inviting them to participate in the 15-day public comment period and/or the public hearing on 4/15/22.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

***Summarize the comments and recommendations received through the public participation process:***

To be completed after the public comment period.

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

To be completed after the public comment period.

## **Needs Assessment and Gaps Analysis**

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

**OPTIONAL Homeless Needs Inventory and Gap Analysis Table**

Homeless											
	Current Inventory				Homeless Population				Gap Analysis		
	Family		Adults Only	Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	DV Survivors	Family		Adults Only
	# of Beds	# of Units	# of Beds/Units	# of Beds					# of Beds	# of Units	# of Beds/Units
Emergency Shelter	1,696	436	3,119	75							
Transitional Housing	1,522	430	577	107							
Rapid Re-Housing	605	172	359	200							
Permanent Supportive Housing	1,280	425	4,969	1,540							
Other Permanent Housing	1,328	335	403	21							
Sheltered Homeless					873	3,397	414	374			
Unsheltered Homeless					317	3,825	339	837			
<b>Current Gap</b>									1,900	600	6,300

**Suggested Data Sources:** 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

**OPTIONAL Housing Needs Inventory and Gap Analysis Table**

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	382,770		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	36,780		
Rental Units Affordable to HH at 50% AMI (Other Populations)	56,145		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		60,445	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		44,710	
<b>Current Gaps</b>			12,230

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

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

All data include Seattle and King County because the homeless data is collected that way and cannot be disaggregated. For consistency the housing data also includes Seattle and King County. King County will only spend HOME ARP funds in King County outside of Seattle.

**Homeless Population**

On the night of the 2020 PIT Count, 11,751 individuals were experiencing homelessness in Seattle/King County.<sup>1</sup> Among them, 53% were sheltered while 47% were unsheltered. Compared to the overall population of Seattle/King County, homelessness disproportionately impacts people of color. This is particularly prominent for individuals who identify as Black/African American (25% of those experiencing homelessness vs 7% of the Seattle/King County population), American Indian/Alaska Native (15% of those experiencing homelessness vs 1% of the Seattle/King County population), and Native Hawaiian/Pacific Islander (4% of those experiencing homelessness vs 1% of the Seattle/King County population). The following additional demographic characteristics were identified:

- 15% Hispanic (relative to 10% of the Seattle/King County Population)
- 56% male, 41% female, 1% transgender, 2% gender non-conforming
- 29% chronically homeless
- 19% below the age of 18, 9% between 18-24, 72% over 25
- 32% families with children (adults and children)
- 7% veterans
- 10% individuals fleeing from domestic violence

Additional analyses by King County's Department of Community and Human Services estimate that approximately 40,800 people experienced homelessness in Seattle/King County at some point over the course of 2020.

**At Risk of Homelessness Population**

The most recent CHAS (Comprehensive Housing Affordability Strategy) data produced by HUD identified 60,445 currently housed households in Seattle/King County at or below 30% AMI with one or more severe housing problems.

**Fleeing Domestic Violence Population**

The 2020 PIT Count identified 1,211 or 10% of individuals experiencing homelessness who were fleeing domestic violence. 70% of these individuals are women and 25% identify as LGBTQIA+. Racially, this group is 36% American Indian, 40% White, and 20% Black or African American.

Domestic violence survivor counts are always undercounts as their safety is dependent on anonymity. Lea Aromin at the Coalition for Ending Gender Based Violence shared anecdotal evidence about two different homeless shelters in South King County. One family shelter has

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<sup>1</sup> 786 of these individuals are youth and therefore not included in the data tables. Homeless adult count was 10,965.

reported to the Coalition that 50% of its residents are fleeing domestic violence, and another reported that 30% to 40% of their intake line callers are fleeing domestic violence.

### **Other Populations including those at greatest risk of housing instability**

The most recent CHAS (Comprehensive Housing Affordability Strategy) data produced by HUD identified 44,710 currently housed households in Seattle/King County between 30%-50% AMI with one or more severe housing problems.

### **Veterans meeting one of the preceding criteria**

The 2020 PIT Count identified 813 or 7% of homeless individuals as Veterans. Of the veteran homeless population, about 80% were male, 57% white, 97% non-Hispanic, and 92% were 25 or older. King County does not have Veteran demographics for the other qualifying populations.

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

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

### **Sheltered and unsheltered homeless populations**

- 1) Housing need: the 2020 Point in Time Count for Seattle/King County showed 11,751 individuals experiencing homelessness. Subtracting those who were in transitional or rapid-rehousing leaves a gap of 6,900 units needed to house 8,200 individuals (600 family sized units needed and 6,300 individual units needed).
- 2) Services need: 29% of people experiencing homelessness during the 2020 Point in Time Count were chronically homeless. A projection using this proportion indicates that at least 3,400 individuals need the deep services provided by permanent supportive housing. However, this figure is based on a one night, point in time count. King County recent analyses of HMIS annual data indicate a much higher need, with approximately 8,900 individuals experiencing chronic homelessness, accessing HMIS services, and in need of housing over the course of 2020 (rather than solely the number experiencing homelessness on the night of the PIT Count).

*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:*

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

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

## **HOME-ARP Activities**

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

King County identified two projects in its 2021 Housing Finance capital competitive RFP that could move forward if HOME-ARP funds are allocated to these projects. In addition, a hotel acquisition outside the funding round could use HOME-ARP funds for rehabilitation and conversion into a 84 unit non-congregate shelter.

Remaining dollars will be offered in the 2022 Housing Finance capital competitive RFP for affordable housing projects.

***If any portion of the PJ’s HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ’s entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ’s HOME-ARP program:***

N/A

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating

assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 5,800,000		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 6,521,525		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 1,480,170	10.7 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 13,801,695</b>		

***Additional narrative, if applicable:***

Based on significant need for new affordable housing units and new non-congregate shelter units, King County plans to allocate HOME-ARP funds to two priority areas: 1) \$6,521,525 or 47% of funds to the development of affordable rental housing, and 2) \$5,800,000 or 42% of funds for the acquisition and development of non-congregate shelter. There are three projects the County can move forward to construction with these funds, leaving a balance of \$1.4M that will be offered in the 2022 Housing Finance Program’s capital funding RFP for affordable housing.

King County intends to commit HOME-ARP funds to the following three projects:

**Development of Affordable Rental Housing**

- 1) A PSH project in Burien that will provide 95 units of Permanent Supportive Housing serving chronic homeless, with 25 units serving disable Veterans

**Acquisition and Development of Non-congregate shelter**

- 2) A 25-unit shelter on the Eastside serving people fleeing domestic violence
- 3) Rehabilitation of a Federal Way site to provide an 84-unit shelter for homeless individuals or families

***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:***

- 180 units of affordable rental housing, at least 95 PSH units

- At least 109 units of non-congregate shelter

***Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:***

Funding will create at least 180 units of affordable rental housing. One of the projects currently in the pipeline that can move forward with HOME-ARP funds will create 95 units of permanent supportive housing in Burien, South King County. Remaining funds of \$1.4M will be offered in the 2022 Housing Finance RFP with a goal of funding an additional 85 units of affordable rental housing, for a total of 180 units.

This funding will add 180 units of the 6,900 needed.

## **Preferences**

***Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:***

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

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

Enter narrative response here.

***If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:***

Enter narrative response here.

## **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.