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To: Friday, November 5, 2021 11:33 AM
Subject: MULTIFAMILYPROGRAMS@LISTSERV.FLORIDAHOUSING.ORG
Announcing Workshop regarding HOME from the American Rescue Plan Act (HOME-ARP)



Florida Housing will host a workshop on Thursday, December 2, 2021, beginning at 2:00 p.m. regarding Home Investment Partnerships Program (HOME) from the American Rescue Plan Act (HOME-ARP).

On April 8, 2021 HUD announced the HOME-ARP allocations for participating jurisdictions and that guidance for use of the funds would be released in Fall 2021. Florida Housing Finance Corporation was awarded \$71,903,340 as the recipient of the state's non-entitlement allocation. This funding is to provide homelessness assistance and supportive services through the following activities:

- Development and support of affordable housing, as currently permitted under the HOME program;
- Tenant-based rental assistance;
- Supportive services, including activities such as transitional housing, housing counseling, and homeless prevention services; and/or
- Acquisition and development of non-congregate shelter units, which may be converted to permanent affordable housing, used as emergency shelter, or remain as non-congregate shelter units.

This workshop will be available by webinar. Registration for the webinar is required and is available on the webpage [https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-\(home\)-from-the-american-rescue-plan-act-\(home-arp\)](https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-(home)-from-the-american-rescue-plan-act-(home-arp)). The agenda for the workshop will be posted to the website prior to the workshop. A Listserv will be issued when this information is available.

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Florida Housing Finance Corporation

HOME-ARP Allocation Plan Workshop Agenda

Registration for Workshop is required. Registration information is available at

([https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-\(home\)-from-the-american-rescue-plan-act-\(home-arp\)](https://www.floridahousing.org/programs/special-needs-housing-overview/home-investment-partnerships-program-(home)-from-the-american-rescue-plan-act-(home-arp)))

Welcome

- A. Introductions
- B. Purpose of Workshop

Florida Housing Finance Corporation is the state recipient for the federal HOME Investment Partnerships Program (HOME). This workshop will solicit consultation regarding the state's HOME-American Rescue Plan (HOME-ARP) Allocation Plan prior to submission to HUD for approval.

Overview of HOME-ARP

- A. Background

In March 2021 Congress passed and the President signed the American Rescue Plan Act (ARP), a federal economic stimulus bill, into law. The ARP provided \$5 billion in federal HOME funding, of which \$71.9 million dollars was allocated to the state of Florida. Florida Housing, as the administrator of HOME funding, will manage this special ARP funding.

- B. Uses of Funds

HOME-ARP funding is intended to provide homelessness assistance and supportive services through four activities:

1. Development and support of affordable housing, as currently permitted under the HOME program;
2. Tenant-based rental assistance;
3. Supportive services, including activities such as transitional housing, housing counseling, and homeless prevention services; and/or
4. Acquisition and development of non-congregate shelter units, which may be converted to permanent affordable housing, used as emergency shelter, or remain as non-congregate shelter units.

Not less than 70% of affordable rental housing units acquired, rehabilitated, or constructed with HOME-ARP funds must be occupied by households in the qualifying populations (see D. below). Units that are not restricted to occupancy by qualifying populations are subject to income targeting and rent requirements established under the HOME-ARP Rental Program rules and are only permitted in properties with rental units restricted for occupancy by qualifying populations. HUD is providing additional flexibilities to structure and underwrite HOME-ARP rental projects, so they remain financially viable during the minimum compliance period.

One hundred percent (100%) of HOME-ARP funds used for tenant-based rental assistance, supportive services, and acquisition and development of non-congregate shelter units must benefit individuals and families in qualifying populations.

- C. HUD Guidance

In mid-September HUD released Notice CPD-21-10 which provided guidance outlining the requirements for the use of funds in the HOME-ARP program. This guidance identified qualifying populations, instructions for completing the HOME-ARP Allocation Plan, eligible uses and activities under the HOME-ARP program, and other federal requirements. The CPD-21-10 Notice identifies the following as required components of a participating jurisdiction's HOME-ARP Allocation Plan:

- A summary of the consultation process and results of upfront consultation;
- A summary of comments received through the public participation process and a summary of any comments or recommendations not accepted and the reasons why;
- A description of HOME-ARP qualifying populations within the jurisdiction;
- An assessment of unmet needs of each qualifying population;
- An assessment of gaps in housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system;
- A summary of the planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations;
- An estimate of the number of housing units for qualifying populations the participating jurisdiction will produce or preserve with its HOME-ARP allocation; and
- A description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population.

D. Qualifying Populations

In its September 2021 guidance, HUD identifies "qualifying populations" (below) to be served through HOME-ARP funding. Any individual or family who meets the criteria for these populations is eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria (e.g., additional income criteria). All income calculations to meet income criteria of a qualifying population or required for income determination in HOME-ARP eligible activities must use the annual income definition in 24 CFR 5.609 in accordance with the requirements of 24 CFR 92.203(a)(1).

- **Homeless**, as defined in 24 CFR 91.5 *Homeless* (1), (2), or (3);
 - (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
 - (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - (ii) No subsequent residence has been identified; and
 - (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
 - (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment.
- **At risk of Homelessness**, as defined in 24 CFR 91.5 *At risk of homelessness*;
 - (1) An individual or family who:
 - (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
 - (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
 - (iii) Meets one of the following conditions:
 - A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - B. Is living in the home of another because of economic hardship;
 - C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - D. Lives 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 for low-income individuals;
 - E. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - F. Is 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. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
 - (2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
 - (3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

- **Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**, as defined by HUD.

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

Domestic violence, which is defined in 24 CFR 5.2003 includes felony or misdemeanor crimes of violence committed by:

- (1) A current or former spouse or intimate partner of the victim (the term "spouse or intimate partner of the victim" includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship);
- (2) A person with whom the victim shares a child in common;
- (3) A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
- (4) A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
- (5) Any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Dating violence which is defined in 24 CFR 5.2003 means violence committed by a person:

- (1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- (2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - (i) The length of the relationship;
 - (ii) The type of relationship; and
 - (iii) The frequency of interaction between the persons involved in the relationship.

Sexual assault which is defined in 24 CFR 5.2003 means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

Stalking which is defined in 24 CFR 5.2003 means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- (1) Fear for the person's individual safety or the safety of others; or
- (2) Suffer substantial emotional distress.

Human Trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102). These are defined as:

- (1) Sex trafficking means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or

- (2) Labor trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery; and
- **Other Populations** where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:
 - (1) **Other Families Requiring Services or Housing Assistance to Prevent Homelessness** is defined as households (i.e., individuals and families) who have previously been qualified as "homeless" as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.
 - (2) **At Greatest Risk of Housing Instability** is defined as a household who meets either paragraph (i) or paragraph (ii) below:
 - (i) Has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);
 - (ii) Has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets of the following conditions from paragraph (iii) of the "At risk of homelessness" definition established in 24 CFR 91.5:
 - A. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - B. Is living in the home of another because of economic hardship;
 - C. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - D. Lives 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 for low-income individuals;
 - E. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - F. Is 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. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
 - (3) **Veterans and Families that Include a Veteran Family Member** that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

HOME-ARP Allocation Plan

A. Consultation

Florida Housing is seeking input from key stakeholders throughout the state in formulating strategies to best utilize the HOME-ARP funding provided. The intent of this Workshop is to incorporate feedback during the Workshop and from written comments provided throughout the following week, into a plan that directs

funding toward identified eligible activities that best meet the needs of qualifying populations through a strategic HOME-ARP Allocation Plan.

B. Public Comment & Participation

After this workshop, but before submitting the HOME-ARP Allocation Plan to HUD, Florida Housing will ensure a copy of the proposed HOME-ARP Allocation Plan, including comments and feedback provided during the HOME-ARP Allocation Plan Workshop, is posted and available for public comment for a period of no less than 15 days. Florida Housing will then work with the Department of Economic Opportunity to incorporate the HOME-ARP Allocation into the FFY2021 Annual Action Plan through a substantial amendment and submit it to HUD for approval.

C. HOME-ARP Allocation Plan Components

The HOME-ARP Allocation Plan must describe the distribution of HOME-ARP funds and the process for soliciting applications and selecting eligible projects. It must also identify any preference(s) established for eligible activities or projects. (Note: specific/selected applications that will be funded are not required to be identified in the HOME-ARP Allocation Plan.)

Below, each of the components are part of the HOME-ARP Allocation Plan, that must be completed by Florida Housing as outlined by the September 2021 guidance issued by HUD.

(1) Needs Assessment and Gaps Analysis

Florida Housing is required to evaluate the size and demographic composition of qualifying populations and assess the unmet needs of those populations. This must be done by identifying any gaps in the state's current shelter and housing inventory as well as the service delivery system.

Florida Housing recently completed a statewide needs assessment for households experiencing homelessness and persons with special needs. Florida Housing proposes to use the preliminary findings from this needs assessment to identify the needs and gaps for completion of this component of the Allocation Plan.

(2) HOME-ARP Activities

Within the HOME-ARP Allocation Plan, Florida Housing must provide details regarding its Request for Applications (RFA) processes related to the intended use of HOME-ARP funds. After this Consultation period Florida Housing will update the HOME-ARP Allocation Plan to include proposed funding levels for each of the eligible activities identified in the Overview section of this agenda which are based upon findings from the Needs Assessment and Gaps Analysis.

(3) HOME-ARP Production Housing Goals

As part of the HOME-ARP Allocation Plan, Florida Housing will need to provide estimates of the number of affordable rental housing units that will be created for qualifying populations as a result of this funding.

(4) Preferences

Florida Housing is asked to identify within the HOME-ARP Allocation Plan if it intends to give preference to one or more of the qualifying populations.

Based on Florida's HOME-ARP award, Florida Housing intends to not set specific prioritizations for certain qualifying populations, but rather utilize HOME-ARP funding to serve as many members of the HUD-permitted qualified populations as possible.

(5) HOME-ARP Refinancing Guidelines

HUD requires recipients that intend to refinance existing debt secured by multifamily rental housing that is being rehabilitated using HOME-ARP funds to provide a copy of the refinancing guidelines as part of the HOME-ARP Allocation Plan and accompanying substantial amendment.

The findings of the Needs Assessment and Gaps Analysis used by Florida Housing for the HOME-ARP Allocation, shows a significant need and gap in the availability of affordable rental housing. Therefore, Florida Housing does not intend to allocate HOME-ARP funding to refinance existing affordable rental housing units at this time.

Next Steps

Accept Consultation Feedback	December 14, 2021
Post HOME-ARP Allocation Plan	December 17, 2021
Public Comment Period Ends	January 4, 2022
Finalize HOME-ARP Allocation Plan (make recommendation to Board)	January 21, 2022
Submit Substantial Amendment to 2021 Annual Action Plan to HUD for Approval	January/February 2022

Agency/Org Consulted	Participant(s)	Type of Agency/Org	Method of Consultation	Feedback
42 Partners	Jorge Aguirre	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
90 Works	Anthony Sawyer	Homeless Services Provider	GoToWebinar Public Webinar	
Ability Housing	Andy Fink Elizabeth Deutsch Shannon Nazworth	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Affordable Homeownership Foundation	Lois Healy	Public Housing Authority	GoToWebinar Public Webinar	
Affordable Housing Solutions for Florida	Debra Fleming	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Alachua County	Jacqui McPhillips	County Government	GoToWebinar Public Webinar	
Alachua County Housing Authority	Sarai Cabrera	Public Housing Authority	GoToWebinar Public Webinar	
Arbor Valley Communities	Amanda Nazaro	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Archway Partners	George Romagnoli	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Atlantic Pacific Communities	Brett Green Dave Heaslip Anagha Jayaprakasan Julian Scheeff Ken Naylor Liz Wong Scott Kriebel	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Banyan Development Group	Yannan Cai Alex Kiss Christopher Koch	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Birdsong Housing	Jeffrey Kiss Steve Auger	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Blue Sky Communities	Geoff Harlan	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Boley Centers	Jack Humburg	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Brevard County	Jeri Flanagan	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Broward County	Ian Golden	County Government	GoToWebinar Public Webinar	
Buchanan Ingersoll & Rooney	Linda Graham	Attorney/Consultant	GoToWebinar Public Webinar	
Burke Blue	Sherita White	Legal Services Provider	GoToWebinar Public Webinar	
Carlos Toledo	Suzanne Fejes	Affordable Housing Consultant	GoToWebinar Public Webinar	
Carrfour Supportive Housing	Marnie George	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Catholic Charities, Diocese of Venice	Stephanie Berman	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Center for Progress & Excellence	Ann Fries	Social Services Provider,	GoToWebinar Public Webinar	
Centerstone	Kristy Santana	Affordable Housing Provider		
Central Florida Behavioral Health Network	Sandi Rowland	Behavioral Health Provider	GoToWebinar Public Webinar	
Charlotte County	Heather Cross	Behavioral Health Provider	GoToWebinar Public Webinar	
City of Clearwater	Hilary Carney	Behavioral Health Managing Entity	GoToWebinar Public Webinar	
City of Lakeland	Lee Fox	County Government	GoToWebinar Public Webinar	See attached comments
City of Miami Beach	Margaret Hogan	City Government	GoToWebinar Public Webinar	
City of Norport	Tara Martinson	City Government	GoToWebinar Public Webinar	
City of Pompano Beach	Luis Rivas	City Government	GoToWebinar Public Webinar	
City of Port St Lucie	Colleen Turner	City Government	GoToWebinar Public Webinar	
City of St Petersburg	Laurie Kimball	City Government	GoToWebinar Public Webinar	
City of West Palm Beach	Terry Malcolm-Smith	City Government	GoToWebinar Public Webinar	
Coalition for the Homeless of Pasco County	Annie Gibson	CoC Lead Agency	GoToWebinar Public Webinar	
Collier County	Marcela Rubio	City Government	GoToWebinar Public Webinar	
Colvard Consulting Services	Jessica Meliti	City Government	GoToWebinar Public Webinar	See attached comments
Community Assisted & Supported Living	Alex Goldstein	City Government	GoToWebinar Public Webinar	
Comprehensive Housing Resources	Don Anderson	City Government	GoToWebinar Public Webinar	
Cornerstone Group	Mendy Solorzano	City Government	GoToWebinar Public Webinar	
Corporation for Supportive Housing	Lowell Atkinson	City Government	GoToWebinar Public Webinar	
Crestview Area Shelter for the Homeless	Stephanie Lampe	City Government	GoToWebinar Public Webinar	
Crown Equities	Kim Spence	City Government	GoToWebinar Public Webinar	
Deirdre Bolden	Carrie Kurutz	CoC Lead Agency	GoToWebinar Public Webinar	See attached comments
Kara Mergl	Donald Luciano	County Government	GoToWebinar Public Webinar	
Traci Spears	Jacob LaRow	Affordable Housing Consultant	GoToWebinar Public Webinar	
Diana Bello	Alison Colvard	Behavioral Health Provider,	GoToWebinar Public Webinar	
Mara Mades	Ashelba Brown	Affordable Housing Provider	GoToWebinar Public Webinar	
Deirdre Bolden	Brian Roskamp	Housing Counseling Agency	GoToWebinar Public Webinar	
Kara Mergl		Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Traci Spears		Technical Assistance Provider	GoToWebinar Public Webinar	
Jack Brandt		Homeless Services Provider	GoToWebinar Public Webinar	
		Affordable Housing Developer/Provider	GoToWebinar Public Webinar	

Dayspring Health	Doug Adkins Mckena Dunn	Behavioral Health Provider	GoToWebinar Public Webinar	See attached comments
Delray Beach Housing Authority	Charmaine Jackson Maggie Perez Shirley Erazo Kristen Griffis	Public Housing Authority	GoToWebinar Public Webinar	
Elder Options	Abigail Costley	Senior Services Provider	GoToWebinar Public Webinar	
Elder Source	Terika Scatliffe	Senior Services Provider	GoToWebinar Public Webinar	
Emeral Coast Regional Council	Ada Clark Garett Griffin	Technical Assistance Provider	GoToWebinar Public Webinar	
Escambia County	Clara Long	County Government	GoToWebinar Public Webinar	See attached comments
Family Promise of South Sarasota County	Jennifer Fagenbaum	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Flagler Health	Lindsey Rodea Sally Reed	CoC Lead Agency	GoToWebinar Public Webinar	
Florida Coalition to End Homelessness	Leeanne Sacino	Homeless Advocacy Group	GoToWebinar Public Webinar	
Florida Housing Coalition	Amanda Rosado Amanda Wander Ashon Nesbitt Ravanna Riecss Amanda Franklin Bill Aldinger Charles Jones Chris McGuire David Hines David Merck David Westcott David Woodward Diana Fields Ebony Cargle Elaine Roberts Freebeau Swindle Jenny Marshall Kenny Derrickson Kevin Tatreau Lisa Nickerson Lisa Walker Matt Jugenheimer Nancy Muller Nicole Gibson Ryan McKinless Sheila Freaney Tim Kennedy Tracy Willis Malcolm Kiner	Technical Assistance Provider	GoToWebinar Public Webinar	
Florida Housing Finance Corporation		Housing Finance Agency	GoToWebinar Public Webinar	
Gainesville Housing Authority		Public Housing Authority	GoToWebinar Public Webinar	
Glasser Schoenbaum Human Services Center	Charlene Altenhain	Homeless Services Provider	GoToWebinar Public Webinar	
Goodwill Industries of Southwest Florida	Christina Russi Maran Hilgendorf	Social Services Provider	GoToWebinar Public Webinar	
Gorman & Company	Joel Reed Noah Gerencir	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Gulf Coast Partnership	Angela Hogan	CoC Lead Agency	GoToWebinar Public Webinar	
Habitat for Humanity, Broward County	Justine Morgan	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Habitat for Humanity, Florida	Barbara Beck Roxanne Young	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	See attached comments
Habitat for Humanity, Lower Keys	Kristina Welburn	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Habitat for Humanity, Pasco County	Melissa Parks	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Haven Partners Group	Jaye Miller	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	See attached comments
Heart of Florida Health Center	Cindy O'Connor Laketa Taylor Rochelle Davila Sonva Price Lakisha Zanders	Health Provider	GoToWebinar Public Webinar	
Hope Family Service		Domestic Violence Services Provider	GoToWebinar Public Webinar	
Housing Authority for the City of Miami Beach	Michael OHara	Public Housing Authority	GoToWebinar Public Webinar	
Housing Authority of Pompano Beach	Cassandra Bell	Public Housing Authority	GoToWebinar Public Webinar	
Housing Trust Group	Jason Larson Rodrigo Paredes	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	See attached comments
Indian River County	John Stoll Robin Miller	County Government	GoToWebinar Public Webinar	See attached comments
Landmark Companies	Francisco Rojo Nicole Rojo	Affordable Housing Developer/Provider	GoToWebinar Public Webinar	
Lee County	Carolina Alcantara Clare Molloy Kim Hustad Mindv Willis	County Government	GoToWebinar Public Webinar	
Lee County Housing Development Corporation	Erika Cooks Twaski Jackson	Housing Counseling Agency	GoToWebinar Public Webinar	
Lee County Schools	Erin Dalla Costa	School District	GoToWebinar Public Webinar	
Magnyfy	Valena Scott	Consultant	GoToWebinar Public Webinar	
Martin County	Dawn Cobb	County Government	GoToWebinar Public Webinar	

McDowell Properties	Angie Vazquez Danny Lopez Gabriel Duarte Nik Echeverria Sean Smith	Affordable Housing Developer/Provider	GoToWebinar Public Webinar
Mid Florida Homeless Coalition	Amber Tucker Tomi Steinruck Ariana Brendle Traies Roe Yisell Rodriguez	CoC Lead Agency Affordable Housing Developer/Provider Attorney/Consultant Social Services Provider	GoToWebinar Public Webinar GoToWebinar Public Webinar GoToWebinar Public Webinar GoToWebinar Public Webinar
National Core	Laresa Scott	Nonprofit Advocacy Provider	GoToWebinar Public Webinar
Nelson Mullins	Sandra Einhorn	Public Housing Authority	GoToWebinar Public Webinar
New Direction Re-entry Center of Marion	Judith Houlios	County Government	GoToWebinar Public Webinar
Nonprofit Executive Alliance of Broward	Sarah Elbadri	County Government	See attached comments
Ocala Housing Authority	Elizabeth Rich	County Government	GoToWebinar Public Webinar
Orange County	Daniel Ramos	County Government	See attached comments
Osceola County	Tammy McDonald	Public Housing Authority	GoToWebinar Public Webinar
Palm Beach County	Cedric Cox Idalia Gonzalez Nancy Hurley Antoinette Kruse	County Government	GoToWebinar Public Webinar
Palm Beach County Housing Authority	Hank Dunn	Affordable Housing Developer/Provider	see attached comments
Polk County	Lynda Harris	Affordable Housing Developer/Provider	GoToWebinar Public Webinar
Providence Family Life Center	Oscar Paul	Affordable Housing Developer/Provider	See attached comments
Provident Housing Solutions	Andrew Brady Terryn Streets	Social Services Provider, Affordable Housing Provider	GoToWebinar Public Webinar
REVA Development Corporation	Susan Veeder Brandy Robinson	Religious Organization	GoToWebinar Public Webinar
Royal American	Brandy Robinson	Consultant	GoToWebinar Public Webinar
Salvation Army	Donna Ramirez	Affordable Housing Developer/Provider	GoToWebinar Public Webinar
St Theresa Catholic Church	Derek Brandt	Banking/Financial Institution	GoToWebinar Public Webinar
TAG Associates	Richard Bienapfl	Nonprofit Fundraising Organization	GoToWebinar Public Webinar
Tapestry Companies	Susan Veeder	Nonprofit Fundraising Organization	GoToWebinar Public Webinar
The First Bank	Brandy Robinson	Social Services Provider, Affordable Housing Provider	GoToWebinar Public Webinar
United Way of Lee County	Linda Hafner	County Government	GoToWebinar Public Webinar
United Way of Marion County	Beth Nelson	General Public	GoToWebinar Public Webinar
Volunteers of America	Kera Beard		
Volusia County	Carmen Hall Adrienne Williams Ann Sprague Brad Satterwhite Carl Baxter Corry Brown Donna Alger James Brooks Liza Brandt Marcella Levin Pamela Phillips Robert Vargas - - -		

Comments received from the HOME-ARP Allocation Plan Consultation Workshop (held December 2, 2021)

1. We should not forget that some of our areas lack capacity. We have this discussion in our Walton County housing group and there is little capacity as far as a nonprofit that can manage affordable housing, so a multifamily complex is out of the question at this moment for us. We should allow some single family options that are appropriate for this population and that all of the funding doesn't get set aside for multifamily housing only.

Also, I manage the rapid rehousing and prevention program, and this looks like it will operate the same way.

An additional concern is who can apply for this funding and how we can maximize it across communities that lack capacity.

Are you looking to have Continuums of Care double dip and come into this for funding?

Ada Clark, Emerald Coast Regional Council

2. Administrative funding for staff or additional staff to seek local housing to drop centers to provide for some housing component, not just a shower and eat opportunity. You have nonprofits who want to create more housing that know exactly where the needs are, know where the truly homeless people are coming to get a shower and a meal but then are going back out to the street into a tent or are trying to sleep in a chair there at that center, so having some administrative supports there and funding to help with increasing capacity building just to provide those units, I think would be really critical, I know specifically in the Orange County area there are a number of them that if they just had some more support administratively they'd be able to focus, secure the contracts for the land, and move forward in providing homeless housing for people going back to a tent.

Are houses and duplexes allowed as currently reflected under this HOME-ARP activity?

Are there restrictions from combining these funds with SAIL funds?

Alison Colvard, Colvard Consulting Services

3. If you do layer the funds with other sources, would the overall project have the same 70% requirements or would that be based on the percentage of funding?

Andy Fink, Ability Housing

4. I want to second Colleen's thoughts on having this money for non-entitlement communities.

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Harold "Trey" Price, Executive Director

Please consider the TBRA rental rates. At the moment they are lower than the fair market rent and we are struggling to find available units at fair market rent, so raising those limits would have an impact on us locally in finding housing.

My question is about preference. Is there going to be any preference to serving literally homeless households as opposed to those who are at-risk? It could be easy for this money to just become part of low-income housing rather than really to serve homeless.

I had a question about the refinancing and new development. Is there be a requirement for an agreement with the CoC? Would it be similar to Link units? Just encouraging that there be better communication between the developer, the CoC, and Florida Housing about making sure those units are maintained for the intended population.

Angela Hogan, Gulf Coast Partnership

5. Is the needs assessment available for public distribution?

There are many conversations about student loan debt and social safety nets for individuals pursuing a post-secondary education. In California a bill was defeated in legislation called the Safe Parking Bill which had to do with creating safe spaces for students who are homeless living in their cars. I am wondering if the needs assessment has identified this population because what we know from research is that 3 in 5 college students face some sort of basic needs insecurity in 2020. Two-year college students consistently report higher rates of housing and food insecurity and those at highest risk of basic needs insecurity include the LGBTQ community and indigenous students. I would request we look a little closer at this population that tends to be embedded in these other qualifying groups.

Antoinette Kruse, Providence Family Life Center

6. Is there a timeline to submit an Allocation Plan?

Clara Long, Escambia County

7. Charlotte County respectfully requests that the \$71.9 million in HOME ARP funds allocated to Florida Housing Finance Corporation for statewide distribution be **preserved or, at minimum, prioritized for non-entitlement communities that did not receive a direct allocation of HOME ARP funds**. Non-entitlement communities should not have to compete for funding with entities that received a direct allocation. Our opportunities for funding are limited enough as it is.

Colleen Turner, Charlotte County

8. We are interested in whether these funds can be used for supportive housing or independent housing for seniors who are at-risk.

Does it matter is the apartment style housing arrangements versus other innovative options or other innovative proposals that would fill a gap in the housing continuum in this part of Florida.

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When do you anticipate the application or allocation process getting under way and we do you hope to have these funds available?

Can these funds be used to help with state licensed ALFs with improvements who serve low-income residents with mental illnesses?

Can the funds be used for construction of supportive housing projects?

Can for profit companies apply for these funds?

Can the funds be used to support construction of a licensed residential treatment facility?

How many sq feet do units have to be to meet the criteria for the funding?

Doug Adkins, Dayspring Health

9. Will the corporation consider there might be developments that haven't commenced construction but they say that they're going to commence construction sometime in the next 12 to 24 months, but the wheels have been set in motion for those developments. Would you consider those types of developments to be eligible to apply for these types of funds?

Would you say that as any other HOME dollars these funds will be subject to the same type of items such as HUD environmental reviews, Davis-Bacon, and all those other things that usually come along with the HOME program, would they apply here as well?

That could affect whether you can in fact make these funds available for a development depending on their standing in terms of the development process that could affect whether they'll be eligible or not. That may be something you want to consider because those who are eligible you may want to give them an opportunity that way you can get the housing quicker.

Francisco Rojo, Landmark Companies

10. What is available for seniors as assistance in paying property taxes?

Jaye Miller, Haven Partners Group

11. Public housing authorities have HUD-VASH and Emergency Rental Assistance Vouchers that can't be used right now in the communities because there's no units in the community. Just want to make sure that is noted in the needs assessment.

I want to make sure that when serving individuals experiencing homelessness, we are looking at the application process to ensure that it is an open application process and that we are not screening people out at entry.

Leeanne Sacino, Florida Coalition to End Homelessness

12. Will there be any programs for people that are over the 50% income limit but cannot afford raised rent and therefore live in a hotel/vehicle?

Mendy Solorzano, City of Port St. Lucie

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Harold "Trey" Price, Executive Director

13. I am with Polk County Housing and Neighborhood Development. We were looking at running our HOME ARP process as the same time as your process in order to leverage your HOME ARP funds and our County HOME ARP funds. This would be an opportunity to leverage both funding sources for our local projects. We are planning an RFP process in the near future. What are your thoughts on this idea?

Nancy Hurley, Polk County

14. Will there be an opportunity to address sustainability for ongoing rental supports for persons at or below 30% AMI?

TBRA doesn't always work if the owner of the rental units can raise rents which make units non-sustainable, regardless of how much money there is. Or the property owner can sell the properties because they do not want to deal with tenants.

Robin Miller, Indian River County

15. Does Florida Housing have the intention to use some of this money for new construction to meet these goals and provide this type of housing?

I think could be a good opportunity to use these funds to develop affordable housing, new construction, and of course if this can be combined with 4% tax credits or something like that or even 9% tax credits and also some SAIL.

Rodrigo Paredes, Housing Trust Group

16. Are there any funds for affordable homeownership?

Roxanne Young, Habitat for Humanity Florida

17. For the construction of affordable housing, have you read the tenant protection requirements? Will there be additional dollars provided from another funding source to make these developments financially sustainable during the compliance period?

Cannot terminate tenancy or refuse to renew lease of tenant of HOME-ARP unit except for serious or repeated violations of lease terms/conditions

Cannot terminate tenancy or refuse to renew lease with qualifying household for inability to pay rent during compliance period

Sarah Elbadri, Orange County

18. I represent the Palm Beach County Housing Authority and we naturally serve the populations of 30% of AMI as well as 50% of the AMI. We receive dozens of calls daily from people living in their cars, some with children, living in hotels and couch surfing. Public housing has been underfunded for years and HA have not been able to maintain some of their stock let alone increase the housing for some of the same qualifying populations as this funding is intended for. Further, our waiting lists are in the various thousands and people have to wait years in many cases for their names to come up. Typically, with other funding sources like LIHTC programs, this

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segment of the population is minimally served. In PBC, rents are out of reach to most families looking for affordable housing.

Will this program contemplate opportunities to increase public housing and/or affordable housing that can be provided by PHAs? Some of the sites have the ability to increase densities and this might be a good opportunity to serve the QP.

Tammy McDonald, Palm Beach County Housing Authority

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Zach Summerlin

From: Bill Aldinger
Sent: Wednesday, October 27, 2021 12:49 PM
To: Zach Summerlin
Cc: Marisa Button
Subject: FW: FHFC - \$70M in HOME ARP funds
Attachments: Untitled Extract Pages.pdf

Just an FYI

From: Angela Hatcher <ahatcher@blueskycommunities.com>
Sent: Wednesday, October 27, 2021 10:17 AM
To: Marisa Button <Marisa.Button@floridahousing.org>; Bill Aldinger <Bill.Aldinger@floridahousing.org>
Cc: Shawn Wilson <swilson@blueskycommunities.com>; Geoffrey Harlan <gharlan@blueskycommunities.com>
Subject: FHFC - \$70M in HOME ARP funds

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

Hey Marisa and Bill,

Last Friday the HOME ARP allocation was included in the agenda package. While we realize it's early in the development stage of an allocation plan and the complete process for distribution, we wanted to ask 2 questions.

- (1) Will FHFC prioritize the funding to non PJ areas? Or allocate to non PJ housing agencies?
- (2) Are the funds to be used solely for Homeless Population? Or can they be used for Family/Elderly etc.



It was great seeing your faces last week.

Angela Hatcher
Senior Vice President – Development Programs

Office: 813-384-4836
Cell: 727-269-3853



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HOME-RENTAL

Action

B. Home Investment Partnerships Program (HOME) Funding from the American Rescue Plan Act (HOME-ARP)

1. Background

- a) The American Rescue Plan (ARP) Act is a federal economic stimulus bill passed by the U.S. Congress and signed into law effective March 11, 2021. The legislation provides \$5 billion from the U.S. Department of Housing and Urban Development (HUD) to the Home Investment Partnerships Program (HOME). This funding is to provide housing and supportive services resources for households that are homeless or not stably housed. The HOME-ARP funding can be used for the following activities:
 - (1) Development and support of affordable housing, as currently permitted under the HOME program;
 - (2) Tenant-based rental assistance;
 - (3) Supportive services, including activities such as transitional housing, housing counseling, and homeless prevention services; and/or
 - (4) Acquisition and development of non-congregate shelter units, which may be converted to permanent affordable housing, used as emergency shelter, or remain as non-congregate shelter units.
- b) HOME-ARP program funds are available for participating jurisdictions to obligate for eligible activities through September 30, 2025. Funds may be drawn for expenditures through September 30, 2030.

2. Present Situation

- a) On April 8, 2021, HUD announced the HOME-ARP allocations for participating jurisdictions and that guidance for use of the funds would be released in Fall 2021. Florida Housing Finance Corporation was awarded \$71,903,340 as the recipient of the state's non-entitlement allocation.
- b) On September 13, 2021 HUD released CPD-21-10 Notice which provided guidance outlining the requirements for the use of funds in the HOME-ARP program. This guidance identified qualifying populations, instructions for completing the HOME-ARP Allocation Plan, eligible uses and activities under the HOME-ARP program, and other federal requirements. The CPD-21-10 Notice identifies the following as required components of a participating jurisdiction's HOME-ARP Allocation Plan:
 - (1) A summary of the consultation process and results of upfront consultation;
 - (2) A summary of comments received through the public participation process and a summary of any comments or recommendations not accepted and the reasons why;
 - (3) A description of HOME-ARP qualifying populations within the jurisdiction;

HOME-RENTAL

Action

- (4) An assessment of unmet needs of each qualifying population;
 - (5) An assessment of gaps in housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system;
 - (6) A summary of the planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations;
 - (7) An estimate of the number of housing units for qualifying populations the participating jurisdiction will produce or preserve with its HOME-ARP allocation; and
 - (8) A description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population.
- c) Florida Housing staff has reviewed the HOME-ARP program requirements described within the legislation and subsequent key guidance provided by HUD. The staff has determined the specific action items that are required by HUD to develop, request approval of, and implement a plan for the allocation of Florida Housing's HOME-ARP funds.. The next steps are to formally seek consultation and public participation in the development of the state's HOME-ARP Allocation Plan for submission to HUD for review and approval.

3. Recommendation

- a) Approve the staff's request to engage in the required consultation and public participation processes to develop a HOME-ARP Allocation Plan for submission to HUD.

Zach Summerlin

From: Turner, Colleen <Colleen.Turner@charlottecountyfl.gov>
Sent: Thursday, December 2, 2021 4:20 PM
To: Zach Summerlin
Cc: Walsh, Carrie
Subject: HOME ARP Public Comment - Charlotte County

Zach,

Thanks to you and Bill for your presentation this afternoon on the HOME ARP Allocation Plan. Here is my official public comment in writing, as advised during the webinar:

Charlotte County respectfully requests that the \$71.9 million in HOME ARP funds allocated to Florida Housing Finance Corporation for statewide distribution be **preserved or, at minimum, prioritized for non-entitlement communities that did not receive a direct allocation of HOME ARP funds.** Non-entitlement communities should not have to compete for funding with entities that received a direct allocation. Our opportunities for funding are limited enough as it is.

Thank you.



Colleen K. Turner

Senior Manager
Charlotte County Human Services
941-833-6502
941-833.6565 fax
www.charlottecountyfl.gov/departments/human-services/
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From: [Barbara Beck](#)
To: [Zach Summerlin](#)
Subject: PUBLIC COMMENT ON HOME-ARP
Date: Tuesday, December 14, 2021 1:23:54 PM

Thank you for the opportunity to provide comments regarding the HOME-ARP funding for the State of Florida.

Habitat for Humanity of Florida, the largest-producing Habitat in the nation, is served by 53 affiliates covering the Panhandle to the Keys by providing affordable homeownership. The Habitat home buying program is well-known for eliminating dependence on other government subsidies by permanently solving the family's housing needs with an affordable mortgage.

Due to the unique community partnership and volunteer labor elements of our homeownership programs, we provide an average mortgage payment for a 3-bedroom/2-bath home for \$700/month, compared to the average rental rate for a similar size home of home \$1300/month.

Since virtually all other programs serve the rental providers, we propose that a portion of the funds be set aside for homeownership, serving homebuyers under 80% of AMI. Like many builders and housing providers, we see a 22% increase in costs to deliver housing due to Coronavirus's effect on the supply chain for building materials.

Habitat for Humanity affiliates currently use some HOME funds for both construction costs and down-payment assistance, so we are familiar with the usage of these funds.

Barbara Beck

Barbara Beck, President/CEO
Habitat for Humanity of Florida
1150 Cleveland Street #301
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December 14, 2021

Florida Housing Finance Corporation

VIA Email to:

Bill.aldinger@floridahousing.org

Zach.summerlin@floridahousing.org

RE: HOME-ARP Public Comment**1. HOME Tenant Based Rental Assistance**

We recommend utilizing a portion of the State's HOME-ARP allocation for TBRA in order to continue the rental assistance of households who are receiving ESG-CV assistance and will not be able to stabilize before the ESG-CV time limitation of September 30, 2022. Those households need continued rental assistance, and some places do not have another source available. Statewide OUR Florida funding is not set to be utilized for this purpose and HOME TBRA could provide that opportunity for those households in need of continued housing stability. These households can be served under **Other Families Requiring Services or Housing Assistance to Prevent Homelessness**.

2. Permanent Supportive Housing

FHFC should utilize a significant portion of the State's HOME-ARP allocation to fund the development of permanent supportive housing. While several populations qualify under HOME-ARP, permanent supportive housing should be set aside for households experiencing homelessness and those with the highest needs. If too broad a population is included, the allocation may not target the groups who need it the most.

Figure 1. Summary table detailing the estimate Supportive Housing (SH) and Affordable Housing (AH) unit need for all subpopulations examined at the time of this analysis.

Qualifying Population	Subpopulations Assessed	Estimated SH Unit Need (household)	Estimated AH Unit Need (household)	Unit Need Totals (SH+AH)
1. Homeless	Individuals experiencing chronic homelessness	4,664	518	5,182
	Individuals experiencing non-chronic homelessness	1,580	13,866	15,446
	Families experiencing homelessness*	296	913	1,209
Qualifying Population Subtotals		6,540	15,297	21,837
2. At-risk of homelessness	Families living doubled up or in hotels/motels	1,346	43,508	44,854
	Individuals exiting prison	319	1,278	1,597
	Youth aging out of foster care	625	1,875	2,500
	Individuals with SPMI and/or SUD in residential or inpatient treatment settings**	726	1,742	2,468
Qualifying Population Subtotals		3,016	48,403	51,419
3. Fleeing or Attempting to Flee DV	Survivors of Domestic Violence	80	1,520	1,600
	Qualifying Population Subtotals		80	1,520
4. Other populations	Individuals with IDD requiring independent living services	995	1,990	2,985
	Child welfare involved families with an adult with special needs	2,180	***	2,180
	Individuals and families receiving SSI, SSDI, or veteran disability benefits	****	76,941	76,941
Qualifying Population Subtotals		3,175	78,931	82,106
Totals		12,811	144,151	156,962

Table Note: This table provides a summary of the overall estimated unit need for SH and AH for the subpopulations assessed in this analysis. Duplication across subpopulations has been accounted for in the methodology and removed wherever possible, but the potential for some duplication may continue to persist in the totals listed above. See Methodology section for more details. Numbers reflected in this report may be off +/- 1 due to rounding.

*Chronically Homeless Families make up less than 10% of the chronically homeless population and a small percentage of families experiencing homelessness. As such, this category includes both non-chronic family households and those with a chronically homeless adult with a disability. HUD defines a Chronically Homeless family as a family with an adult head of household who meets the definition of a Chronically Homeless individual.

**Assessment of need for individuals for whom no subsequent residence has been identified upon discharge.

***This category assessed child-welfare involved families where one or more adults in the household who have a Special Need. A rate of 18% was applied to the total number of child-welfare involved families to estimate the share with Special Needs. This estimated number was allocated to a supportive housing intervention. Child welfare involved families without Special Needs may likely have affordable housing needs, but are expected to be captured in other assessment categories and were not assigned to an AH value here to minimize duplication.

****In order to further prevent duplication, households in this group that would need supportive housing are assumed to be captured by other systems due to service needs and the high probability of duplication with other subpopulations in systems assessed for this report. This is not intended to indicate that there is never a need for a particular intervention for the specified subpopulation, or that overlap is 100%.