



listservs, which include 1,370 members and 882 members, respectively. The members of these listserv groups represent stakeholders from affordable rental and permanent supportive housing developers and providers (both for-profit and non-profit partners), state and local advocacy groups, homeless services providers, and community leaders that serve vulnerable populations (including but not limited to survivors of domestic violence, McKinney-Vento homeless education liaisons, individuals with intellectual and/or developmental disabilities, NAMI members, etc.). Additionally, this communication was forwarded to each of Florida's 27 local homeless Continuum of Care lead agencies, the statewide Council on Homelessness, the Florida Coalition to End Homelessness, the Florida Supportive Housing Coalition, the Florida Housing Coalition, Coalition of Affordable Housing Providers, public housing authorities throughout Florida, the Florida Department of Children & Families Domestic Violence program office, the Florida Council Against Sexual Violence, and an advisory workgroup that was convened earlier in 2021 to lead a statewide needs assessment for homeless and special needs households in Florida. Beyond the listserv announcement, Florida Housing publicly noticed the Consultation workshop through numerous channels including, the Florida Administrative Register, the Florida Housing social media pages, and on multiple webpages within the Florida Housing website.

On December 2, 2021, Florida Housing convened a virtual public meeting to solicit input and consult with key stakeholders that serve and support qualifying populations identified in the Home Investment Partnerships Program (HOME) section of the American Rescue Plan Act (HOME-ARP) guidance issued by HUD in September 2021. This meeting was recorded and a link to the recording is posted on the Florida Housing HOME-ARP 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)))).

At this meeting Florida Housing provided an overview of HOME-ARP; discussed the eligible uses of funds identified within the guidance provided by HUD; reviewed the eligible qualifying populations identified by HUD; examined the gaps and needs of these qualifying populations based on a comprehensive statewide needs assessment conducted by the Corporation for Supportive Housing; and described the required components of the HOME-ARP allocation plan including an anticipated timeline for submitting the plan. A copy of the meeting agenda is attached as a reference point for review.

During this consultation, Florida Housing solicited questions, comments, and feedback about the eligible uses of funds as allowed by HUD. Florida Housing attached a list of participants from this Consultation meeting including the organization represented, as well any submitted feedback provided during the meeting. Additional attachments include comments provided during the consultation meeting as well as written consultation provided prior to the official public participation window opening. At this point Florida Housing staff incorporated all applicable verbal and written consultation feedback into an updated draft of the allocation plan. This new draft was made available for public participation and comment beginning December 17, 2021.

Throughout the administration of the HOME-ARP, Florida Housing remains committed to continuing a dialog with stakeholders about the ongoing needs of the qualifying populations. Florida Housing will continue to solicit feedback from and educate key stakeholders on the status of HOME-ARP funding through its role as a statutorily identified member of the state Council on Homelessness, and as the Chair of the Council's Affordable Housing Committee.

Also included as attachments are any comments or feedback received after the Consultation meeting, but prior to opening the plan for public participation.

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

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.

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

The Consultation Process included 190 individuals representing 100 different organizations/groups.

A full table of participants is attached as a pdf.

## **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 - 12/17/2021 end date - 1/7/2022
- ***Public hearing:*** 1/11/2022

Florida Housing posted a draft of the Allocation Plan on its website. This draft of the plan included all applicable feedback received during the Consultation process. Using the same methods to solicit input during the Consultation process, Florida Housing notified the public that this plan was available for review and the process by which to submit written comments. Additionally, Florida Housing scheduled a public hearing to address comments received and receive new comments on the plan on January 11, 2022.

***Describe any efforts to broaden public participation:***

In addition to working with each of the groups identified in the Consultation process, Florida Housing communicated with the Department of Economic Opportunity – the state partner responsible for submitting the HUD Consolidated Plan and the Annual Action Plans – to include their partnering individuals and organizations in the public participation period.

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:***

Public participation feedback will be collected, summarized, and inserted here prior to the identified public hearing date.

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

Enter narrative response here.

## **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	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	#	#	#	#	#								
Transitional Housing	#	#	#	#	#								
Permanent Supportive Housing	#	#	#	#	#								
Other Permanent Housing						#	#	#	#				
Sheltered Homeless						#	#	#	#				
Unsheltered Homeless						#	#	#	#				
<b>Current Gap</b>										#	#	#	#

**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	#		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	#		
Rental Units Affordable to HH at 50% AMI (Other Populations)	#		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		#	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		#	
<b>Current Gaps</b>			#

**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:***

HUD defines qualifying populations as (1) homeless; (2) at risk of homelessness; (3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; and (4) other populations, including other families requiring services or housing assistance to prevent homelessness, and at greatest risk of housing instability.

In September 2020, Florida Housing partnered with the Corporation of Supportive Housing to complete a comprehensive state-level needs assessment to identify the statewide affordable and permanent supportive housing needs of special needs and homeless populations, as well as perform financial modeling to address the housing development costs to meet the identified housing needs. Data tables from this needs assessment are attached to this allocation plan for reference.

Special needs households are defined in Florida Statute as an adult with a disabling condition that requires supportive services to live independently; youth aging out foster care; survivors of domestic violence; or a person receiving benefits under the Social Security Disability Insurance (SSDI) program or the Supplemental Security Income (SSI) program or from veterans' disability benefits. The advisory group for this needs assessment included representatives from the following organizations: the Florida Department of Children and Families Office of Substance Abuse and Mental Health, the Florida Agency for Persons with Disabilities, the Florida House of Representatives, NAMI Advocacy Group, the Florida Supportive Housing Coalition, the Florida Council on Homelessness, the University of Florida's Shimberg Center for Housing Studies, the Florida Housing Coalition, the Florida Coalition to End Homelessness, the ARC of Florida, and Youth and Family Alternatives.

As part of this statewide evaluation, Florida Housing was able to look at detailed subpopulations that fit into the qualifying populations outlined in the HOME-ARP guidance issued by HUD in September 2021. These subpopulations include Homeless (individuals experiencing chronic homelessness, individuals experiencing non-chronic homelessness, and families experiencing homelessness); At-risk of Homelessness (families living doubled up or in hotels/motels, individuals exiting prison, youth aging out of foster care, and individuals with severe and persistent mental illness and/or substance use disorders in residential or inpatient treatment settings); Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking (survivors of domestic violence); and Other Populations (persons with intellectual/developmental disabilities requiring independent living services, child welfare-involved families with an adult with special needs, and individuals and families receiving SSDI/SSI/Veterans Disability Benefits). The identified households for each qualifying population are as follows: Homeless (21,837); At-risk of Homelessness (51,419); Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking (1,600); and Other Populations, including Other Families Requiring Services or Housing Assistance to Prevent Homelessness, and Households at Greatest Risk of Housing Instability (82,106). Duplication across qualifying populations is accounted for and removed wherever possible, creating what in some cases may be considered an underrepresentation (i.e., Some households Fleeing a Domestic Violence are likely included in other qualifying populations, such as Homeless or At-risk of Homelessness.).

***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:*

Findings from the Needs Assessment conducted by the Corporation for Supportive Housing for Florida Housing, show an estimated 156,962 homeless and/or special needs households have a need for either supportive or affordable housing. An estimated 70,756 households experiencing or at-risk of homelessness in Florida were identified as needing housing. Many of the households that need assistance to prevent homelessness, or those at the greatest risk of housing instability, are identified in the persons with special needs categories described above. These subpopulations account for an estimated 86,206 households in need of either supportive or affordable housing.

The financial modeling included in the needs assessment estimates that it would cost approximately \$36.32 billion to create enough new supportive housing and affordable rental housing units for the number of households identified in this study.

***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:***

The state of Florida – including state and local government partners, and homeless and housing services organizations – have actively worked to ensure that vulnerable households have been able to access supports and services, including rental assistance throughout the COVID-19 pandemic. Shortly after the passage of the CARES Act, Florida’s Governor committed \$250 million of Coronavirus Relief Funds to keep vulnerable households stably housed. In addition, many local governments also immediately started rental assistance programs using their allotment of these resources. The Florida Department of Children and Families was the statewide recipient of \$85.9 million in Emergency Solutions Grant (ESG-CV) that was deployed to assist households experiencing or at-risk of homelessness. ESG-CV funding has utilized a number of strategies to assist vulnerable households, including non-congregate sheltering, supportive services as allowed under the ESG-CV guidance, and rental assistance in the form of Rapid Rehousing. Recent reports from this administering entity identify current expenditures of the state’s ESG-CV allocation at \$44.3 million (51.5% of its total award). In late 2021 as part of the Consolidated Appropriations Act passed by Congress and signed into law, state administering agencies in Florida received \$871.2 million of Emergency Rental Assistance (ERA) program dollars, and \$676.1 million in Homeowner Assistance Funds (HAF). To date, the state administering agency for the ERA program reports having expended \$302.9 million (34.7%) of its ERA-1 allocation. The state has not expended any of its \$296.2 million ERA-2 allocation.

The current expenditure activity for housing-related services and supports with the various COVID-related funds identified above helps to explain the needs of existing tenant-based rental assistance and supportive services for qualifying populations.

Florida Housing has standing relationships with many partners that can help deploy strategies that will benefit the qualifying populations. For example, Florida Housing works with public housing authorities and local government housing offices to provide tenant-based rental assistance for eligible households

using both state and federal funds, while also coordinating more than a dozen competitive RFAs which include a diverse pool of state and federal funds to finance and develop affordable rental housing for vulnerable populations, including households at risk of or experiencing homelessness.

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

When examining the latest data available through the Annual Homeless Assessment Report (AHAR), there are several key data points that stand out. The average HMIS bed utilization rate for Emergency Shelter, Transitional Housing, and Safe Haven beds in Florida since 2011 is 74.1%. The median percentage is 73.8%. Within the last decade (since 2011), the highest level of HMIS participation rate for Emergency Shelter, Transitional Housing, and Safe Haven beds was in 2012 at 78.1%. The latest year available (2020) showed the use of Emergency Shelter, Transitional Housing, and Safe Haven beds at 74.7%.

Conversely, when examining Occupancy Rates for properties financed through Florida Housing there is very limited unit availability, with monthly occupancy rates in the past year fluctuating between 97% and 98% statewide. Based on the data available, the current emergency shelter and transitional housing system has historically and is currently operating below the available bed capacity, while data from the Florida Housing occupancy reports show that permanent housing is at or nearing capacity.

***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:***

The needs assessment recently conducted and used for the HOME-ARP allocation plan, noted “in Florida, a variety of interventions exist to support individuals and families facing a housing crisis who are experiencing homelessness and/or have special needs that require unique approaches to ensure housing stability.” Florida Housing included the following subpopulations in its needs assessment – persons with intellectual and/or developmental disabilities; survivors of domestic violence; child welfare involved families with an adult with special needs; youth aging out of foster care; and individuals and families receiving SSDI, SSI, or Veteran disability benefits – because many of these households experience vulnerabilities or compounding issues related to housing stabilization and self-sufficiency. When examining the complexities of these households it becomes evident that there are many exacerbating factors that place these households at risk of homelessness and/or needing additional supports and services necessary to prevent homelessness and maintain housing stability.

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

Florida has been extremely fortunate to have resources available that have provided unstably housed individuals and families with rental assistance and/or supportive services since the beginnings of the COVID-19 pandemic in early 2020. Resources such as ESG-CV, ERA, and HAF have provided and continue to provide critical stabilizing supports for households at risk of eviction or foreclosure. Where many communities are expanding the eligible uses of ESG-CV and the statewide efforts relating to ERA are increasing access for more and more households, a consistent message is emerging that there is a tremendous need for additional affordable rental housing units statewide. Data from the needs assessment and Florida’s triennial Rental Market Study shows a vast gap in the availability of affordable

rental housing statewide. Programs such as ESG-CV, ERA, and HAF are not structured in a way to address Florida's limited availability of affordable rental housing, however the HOME-ARP program is. HOME-ARP makes the development and support of affordable rental housing a key strategy in addressing the needs these vulnerable households face.

***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:***

The housing needs of the qualifying populations were determined through the third-party needs assessment conducted by the Corporation for Supportive Housing. Tables from the needs assessment are attached to this plan.

Shelter data presented in the questions above was determined by examining the latest AHAR data available from HUD at <https://www.huduser.gov/portal/datasets/ahar/2020-ahar-part-1-pit-estimates-of-homelessness-in-the-us.html>.

Affordable rental housing occupancy reports and data were collected from <https://www.floridahousing.org/data-docs-reports/occupancy-reports> and occupancy rates were calculated based upon monthly submissions using the number of occupied units divided by the total number of units for reporting properties.

Financial and service delivery information was provided from the administering agencies for the ESG-CV and ERA programs.

## **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:***

Florida Housing solicits applications to fund the new construction or acquisition and rehabilitation of rental developments to create new affordable rental housing units through a series of Requests for Applications (RFAs) that are tailored to specific development criteria such as geographic areas of location, areas of opportunity and demographic commitments. Applications are processed by Florida Housing staff in accordance with specifications set forth in each RFA and are selected for funding via publicly held Review Committee Meetings before being submitted to Florida Housing's Board of Directors for final approval. Upon final approval from its Board of Directors, Florida Housing invites selected Applicants to engage in credit underwriting for RFAs related to the creation of affordable rental housing.

***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:***

Not applicable. Florida Housing will not make HOME-ARP funds available prior to approval of the allocation plan by HUD.

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	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 5,000,000		
Development of Affordable Rental Housing	\$ 62,500,000		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 4,403,340	6.1 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 71,903,340</b>		

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

Florida Housing will provide additional budget narrative(s) as necessary.

***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:***

Based on the (lack of) availability of affordable rental housing units in the Florida Housing Occupancy Reports and the findings identified in the needs assessment conducted, the need for the development and support of affordable rental housing is a critical need in Florida. Coupling these results with the remaining funds and expansion efforts included in ESG-CV and ERA program activities that provide services that are duplicative of other allowable costs, data suggests the greatest needs include affordable rental housing and targeted tenant-based rental assistance.

Florida Housing is also committed to using any administrative funds to support its nonprofit partnering organizations with training and technical assistance needed to effectively implement programs that can serve the qualifying populations identified.

**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:***

Florida Housing projects that the amount allocated to the Development of Affordable Rental Housing category can create an estimated 480 units.

***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:***

New affordable rental housing units created with HOME-ARP funding will target eligible households across the qualifying populations and provide a number of affordable and permanent supportive housing solutions throughout Florida. Florida Housing anticipates using existing (and possible new) RFAs and approaches to create these new affordable rental housing solutions. Through this approach, the number of HOME-ARP funded units will vary across communities based upon need and the ability to combine HOME-ARP with other resources to support developments. Florida Housing intends to include HOME-ARP funds in its existing RFAs that specifically focus on the creation of permanent affordable housing for households experiencing homelessness, as well as existing RFAs that include a set-aside for homeless households. Additionally, Florida Housing anticipates using HOME-ARP funds in new RFAs to create new units through multiple strategies in a way that will create more integrated communities for the qualifying populations.

## **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.

Florida Housing does not intend to narrow the scope of qualifying populations with a “preference”, but instead work to serve as many households as possible across all qualifying populations with its HOME-ARP funding. Florida Housing will work with stakeholders to ensure that qualifying populations are served and will benefit from HOME-ARP funds in all competitive solicitations (e.g., Requests for Applications [RFA], etc.) in which HOME-ARP dollars are included.

***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:***

By incorporating HOME-ARP funding into Florida Housing's traditional RFA schedule, funding will be dedicated to incorporating units specifically identified for qualifying populations into Florida Housing-financed affordable rental housing developments. Integrating qualifying populations into mainstream affordable rental housing solutions allows these vulnerable populations to become part of a community without the stigma of being isolated or creating concentrated areas of poverty.

***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:***

Florida Housing does not intend to specifically target a single qualifying population with a “preference”, and because it will commit to integrating HOME-ARP funds into many of its competitive solicitations, Florida Housing will be able to utilize these funds to create more integrated development communities. The ability of Florida Housing to rapidly integrate this funding into already planned RFAs will expedite the ability to deploy HOME-ARP funds across the state and strategically ensure that the development of affordable rental housing targets the qualifying populations.

In response to emerging and evolving affordable housing needs, Florida Housing continually updates its existing practices for issuing RFAs and develops and issues new RFAs on a regular basis. This will allow Florida Housing to customize the distribution of HOME-ARP funds through a variety of strategies and best serve the identified qualifying populations.

## **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***

The findings of the Needs Assessment and Gaps Analysis used by Florida Housing show a significant gap in the number of affordable rental housing units available. Therefore, Florida Housing does not intend to allocate HOME-ARP funds for the purpose of refinancing existing affordable rental housing units at this time.

- ***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.***

Not applicable as Florida Housing does not currently intend to allocate HOME-ARP funding to refinance existing affordable rental housing units.

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

Florida Housing does not currently intend to allocate HOME-ARP funding for the purposes of refinancing existing affordable rental housing units, but rather focus on new construction of affordable rental housing.

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

Not applicable as Florida Housing does not intend to allocate HOME-ARP funding for the purposes of refinancing.

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

Florida Housing does not intend to allocate HOME-ARP funding for refinancing.

- ***Other requirements in the PJ's guidelines, if applicable:***

Enter narrative response here.