

### Participating Jurisdiction:

State of Florida (Florida Housing Finance Corporation)

Date:

### Consultation

#### Summary of the Consultation Process:

As Florida's state housing finance agency, Florida Housing Finance Corporation (Florida Housing) serves as the administering entity leading the state's participating jurisdiction. On November 5, 2021, Florida Housing issued the attached listserv announcement to its *MultifamilyPrograms* and *SpecialNeeds* listservs, which include 1,370 members and 882 members, respectively, and representing 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 conduct a statewide needs assessment for homeless and special needs households in Florida. Beyond the listserv announcement, Florida Housing has publicly noticed the Consultation workshop through numerous channels including, the Florida Administrative Register, the Florida Housing social media pages, and on multiple pages within the Florida Housing website.

On December 2, 2021, Florida Housing will convene a virtual public meeting to solicit input and consult with key stakeholders that serve and support qualifying populations identified in the HOME-ARP guidance issued by HUD in September 2021. This meeting will be recorded and a link to the recording will be 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 will provide an overview of HOME-ARP; discuss the eligible uses of funds identified within the guidance provided by HUD; review the eligible qualifying populations identified by HUD; examine the gaps and needs of these qualifying populations based on a comprehensive statewide needs assessment conducted by the Corporation for Supportive Housing (CSH); and describe the required components of the HOME-ARP allocation plan including a timeline for submitting the plan.

During this meeting, Florida Housing will solicit questions, comments, and feedback about the eligible uses of funds as allowed by HUD. Florida Housing will attach a list of participants from this Consultation meeting including the organization represented, as well any submitted feedback provided during the meeting.

Throughout the administration of the HOME-ARP, Florida Housing remains committed to continuing a dialog about the ongoing needs of the qualifying populations with stakeholders. 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, as well as the Chair of the Council's Affordable Housing Committee.

Agency/Org Consulted:	Type of Agency/Org:	Method of Consultation:	Feedback:
Insert image of table with all participants, comments, questions, etc.			

### Public Participation

Public Comment period (start/end dates):

Public Hearing (date):

Describe any efforts to broaden public participation:

In addition to working with each of the groups identified in the Consultation process, Florida Housing intends to communicate 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.

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:

### Needs Assessment and Gaps Analysis

The PJ may use the optional tables provided in the HOME-ARP Allocation Plan Template and/or attach additional data tables.

Florida Housing will attach final data tables from the completed Needs Assessment as they become available.

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 (CSH) to complete a 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. Special needs households are defined in Section 420.0004(13), Florida Statutes, 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 groups: 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.

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 CSH for Florida Housing, show an estimated XXXX homeless and/or special needs households have a need for either supportive or affordable housing. An estimated XXXX 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. This sub-categorization accounts for an estimated need of XXXX households in need of either supportive or affordable housing.

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 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 started immediate 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. Recent reports identify current expenditures of the state's ESG-CV allocation at \$36.4 million (42.4% 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, with administered at the state-level and \$676.1 million in Homeowner Assistance Funds (HAF). To date, the state administering agency for the ERA program reports having expended \$331 million (38.0%) of its ERA-1 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.

Additionally, 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. It also administers more than a dozen competitive RFAs, annually, that distribute a diverse pool of state and federal resources to finance and

develop affordable rental housing statewide for families, elders, farm/fishing workers, persons with special needs and homeless households uses.

**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%, and the median is 73.8%. Within the last decade (since 2011), the highest level of HMIS participation rate 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 availability, with monthly occupancy rates in the past year fluctuating between 97% and 98% statewide, with many affordable rental housing developments posting occupancy reports at 100% for several months during this time. 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 many permanent housing solutions are nearing their programmatic 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:**

Florida Housing included the following sub-categorizations 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. Additionally, Florida’s triennial Rental Market Study shows a tremendous gap in the availability of affordable rental housing statewide, and programs such as ESG-CV, ERA, and HAF are not structured in a way to address Florida’s limited availability of affordable rental housing, but the HOME-ARP program is. HOME-ARP makes the development and support of affordable rental housing a key strategy in addressing the needs of vulnerable households.

**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:**

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 calculated based upon data reporting (and data availability) 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 PH will administer eligible activities directly:

Florida Housing solicits applications to fund the new construction or rehabilitation of 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 and demographic commitments. Florida Housing advertises and convenes public workshops to inform and solicit input from the public and stakeholders to assist with the development of each RFA issued. The competitive solicitation applications are processed and scored 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 and executing financing agreements between the Applicant and Florida 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. The distribution of HOME-ARP funds will be contingent only upon 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.

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services			
Acquisition and Development of Non-Congregate Shelters			
Tenant Based Rental Assistance (TBRA)			

Development of Affordable Rental Housing			
Nonprofit Operating			5%
Nonprofit Capacity Building			5%
Administration and Planning			15%
Total HOME-ARP Allocation	\$71,903,340		

Additional narrative, if applicable:

Florida Housing will provide additional budget narrative 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:

### 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:

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:

### 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:

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:

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:

### 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:

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.

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

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

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

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

DRAFT

## Zach Summerlin

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**From:** Multifamily Programs <MULTIFAMILYPROGRAMS@LISTSERV.FLORIDAHOUSING.ORG>  
on behalf of Multifamily Allocations <Multifamily.Allocations@FLORIDAHOUSING.ORG>  
**Sent:** Friday, November 5, 2021 11:33 AM  
**To:** MULTIFAMILYPROGRAMS@LISTSERV.FLORIDAHOUSING.ORG  
**Subject:** 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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