



# Waukesha County HOME Consortium HOME-ARP Allocation Plan

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**October 2022**

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# HOME-ARP ALLOCATION PLAN

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For the HOME Consortium Serving Jefferson, Ozaukee, Washington,  
and Waukesha Counties

## WAUKESHA COUNTY, WISCONSIN

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Department of Parks and Land Use, Community Development  
Division

DRAFT  
October 2022

Prepared for Waukesha County by  
Mosaic Community Planning, LLC



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# INTRODUCTION

The American Rescue Plan (ARP) was signed into law on March 11, 2021 to provide federal funding to relieve the continued impact of the COVID-19 pandemic on the economy, public health, state and local governments. As part of the American Rescue Plan (ARP), the U.S. Department of Housing and Urban Development (HUD) is providing \$5 billion in funding to jurisdictions across the country that participate in HUD's Home Investment Partnerships (HOME) entitlement grant program. This funding will assist people who are homeless or at risk of homelessness and other vulnerable populations through housing, rental assistance, supportive services, and non-congregate shelter, with the goal of reducing homelessness and increasing housing stability. Grantees are required by HUD to develop and submit plans outlining their housing and homeless needs and their anticipated uses of HOME-ARP funding.

The Waukesha County HOME Consortium is scheduled to receive \$5.3 million in HOME-ARP funds and has engaged in a consultation and public participation process to develop this HOME-ARP Allocation Plan. In this Plan, the Consortium describes how it intends to distribute HOME-ARP funds locally. In accordance with federal regulations and the guidelines contained in the Community Planning and Development Notice CPD-21-10, the Plan will be submitted to HUD as a substantial amendment to the Consortium's 2021 Annual Action Plan.

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# CONSULTATION

**Describe the consultation process including methods used and dates of consultation.**

In developing this HOME-ARP Allocation Plan, the HOME Consortium consulted with about 40 agencies providing a variety of services for people who are homeless, at risk of homelessness, or otherwise in need of housing assistance or related services. The Housing Action Coalition (HAC) serves as the local Continuum of Care and regularly convenes its member organizations and other providers working to address homelessness in the area. The HOME Consortium worked through HAC to gather information for this Plan from local organizations, including participation in monthly Provider Collaborative meeting as well as its monthly Board meeting. Dates and times for these meetings are shown below:

**HAC Provider Collaborative**

Thursday, May 26  
9 AM  
Via Zoom

**HAC Board Meeting**

Monday, June 13  
2 PM  
Waukesha City Hall or via Zoom

Upon development of a draft HOME-ARP Allocation Plan, the Consortium presented the draft to the HAC Board and Provider Collaborative for feedback and input regarding preferences and limitations. Dates and times for these meetings are shown below:

**HAC Board Meeting**

Monday, September 12  
2 PM  
Waukesha City Hall or via Zoom

**HAC Provider Collaborative**

Thursday, September 22  
9 AM  
Via Zoom

Additionally, the HOME Consortium held a series of community workshops to gather input from residents and community stakeholders. These workshops were open to the general public, including agency representatives. An invitation was emailed to over 200 contacts including local municipalities, housing and social service providers, school district representatives, and others. A total of 54 people participated in a HAC meeting or community workshop.



Agency representatives that participated in development of the HOME-ARP Allocation Plan will also have the opportunity to provide a comment on the draft plan during the 15-day public comment period. A list of agencies that participated in development of the Plan is provided below.

**TABLE 1 – LIST OF ORGANIZATIONS CONSULTED**

	Agency/Organization Consulted	Type of Agency/ Organization	Method of Consultation
1	Aging and Disability Resource Center	<ul style="list-style-type: none"> <li>• Organization addressing needs of persons with disabilities</li> </ul>	<ul style="list-style-type: none"> <li>• Community workshop</li> </ul>
2	City of New Berlin Community Development	<ul style="list-style-type: none"> <li>• Public agency</li> </ul>	<ul style="list-style-type: none"> <li>• Community workshop</li> </ul>
3	City of Oconomowoc Planning Department	<ul style="list-style-type: none"> <li>• Public agency</li> </ul>	<ul style="list-style-type: none"> <li>• Community workshop</li> </ul>
4	City of Waukesha Community Development; Elected Officials	<ul style="list-style-type: none"> <li>• Public agency</li> </ul>	<ul style="list-style-type: none"> <li>• HAC board meeting</li> <li>• Community workshop</li> </ul>
5	City of Waukesha Police Department	<ul style="list-style-type: none"> <li>• Public agency</li> </ul>	<ul style="list-style-type: none"> <li>• HAC provider collaborative meeting</li> </ul>
6	Community Action Coalition of South Central Wisconsin	<ul style="list-style-type: none"> <li>• Homeless service provider</li> </ul>	<ul style="list-style-type: none"> <li>• HAC provider collaborative meeting</li> <li>• Community workshop</li> </ul>
7	Eras Senior Network	<ul style="list-style-type: none"> <li>• Agency serving seniors</li> </ul>	<ul style="list-style-type: none"> <li>• HAC provider collaborative meeting</li> </ul>
8	Family Promise of Washington County	<ul style="list-style-type: none"> <li>• Homeless service provider</li> <li>• Agency serving qualified population</li> </ul>	<ul style="list-style-type: none"> <li>• Community workshop</li> </ul>
9	Hebron Housing Services	<ul style="list-style-type: none"> <li>• Homeless service provider</li> <li>• Agency serving qualified population</li> </ul>	<ul style="list-style-type: none"> <li>• HAC board meeting</li> <li>• HAC provider collaborative meeting</li> <li>• Community workshop</li> </ul>
10	Hope Center	<ul style="list-style-type: none"> <li>• Homeless service provider</li> <li>• Agency serving qualified population</li> </ul>	<ul style="list-style-type: none"> <li>• HAC provider collaborative meeting</li> </ul>
11	Housing Action Coalition	<ul style="list-style-type: none"> <li>• Continuum of care</li> </ul>	<ul style="list-style-type: none"> <li>• HAC board meeting</li> <li>• HAC provider collaborative meeting</li> </ul>
12	HUD	<ul style="list-style-type: none"> <li>• Public agency</li> </ul>	<ul style="list-style-type: none"> <li>• HAC provider collaborative meeting</li> </ul>
13	Jefferson County Board of Supervisors	<ul style="list-style-type: none"> <li>• Public agency</li> </ul>	<ul style="list-style-type: none"> <li>• Community workshop</li> </ul>
14	Jefferson County Economic Development Consortium	<ul style="list-style-type: none"> <li>• Public agency</li> </ul>	<ul style="list-style-type: none"> <li>• Community workshop</li> </ul>
15	Literacy Services of Wisconsin	<ul style="list-style-type: none"> <li>• Literacy services</li> </ul>	<ul style="list-style-type: none"> <li>• HAC provider collaborative meeting</li> </ul>
16	Lutheran Social Services of Wisconsin and Upper Michigan	<ul style="list-style-type: none"> <li>• Homeless service provider</li> <li>• Agency serving qualified population</li> </ul>	<ul style="list-style-type: none"> <li>• HAC provider collaborative meeting</li> </ul>

**TABLE 1 – LIST OF ORGANIZATIONS CONSULTED (CONTINUED)**

	Agency/Organization Consulted	Type of Agency/ Organization	Method of Consultation
17	Metro Milwaukee Fair Housing Center	<ul style="list-style-type: none"> <li>Agency addressing fair housing and civil rights</li> </ul>	<ul style="list-style-type: none"> <li>HAC provider collaborative meeting</li> </ul>
18	Milwaukee Veterans Affairs Medical Center	<ul style="list-style-type: none"> <li>Veterans’ group</li> </ul>	<ul style="list-style-type: none"> <li>HAC provider collaborative meeting</li> </ul>
19	Movin’ Out	<ul style="list-style-type: none"> <li>Housing provider</li> <li>Organization addressing needs of persons with disabilities</li> </ul>	<ul style="list-style-type: none"> <li>Community workshop</li> </ul>
20	NAMI Southeast Wisconsin	<ul style="list-style-type: none"> <li>Organization addressing needs of persons with disabilities</li> </ul>	<ul style="list-style-type: none"> <li>HAC provider collaborative meeting</li> </ul>
21	Ozaukee County Department of Human Services	<ul style="list-style-type: none"> <li>Agency serving qualifying population</li> </ul>	<ul style="list-style-type: none"> <li>Community workshop</li> </ul>
22	Pro Health Care	<ul style="list-style-type: none"> <li>Healthcare organization</li> </ul>	<ul style="list-style-type: none"> <li>HAC board meeting</li> </ul>
23	Salvation Army of Waukesha County	<ul style="list-style-type: none"> <li>Homeless service provider</li> <li>Agency serving qualified population</li> </ul>	<ul style="list-style-type: none"> <li>HAC board meeting</li> </ul>
24	St. Vincent de Paul Waukesha County	<ul style="list-style-type: none"> <li>Homeless service provider</li> </ul>	<ul style="list-style-type: none"> <li>HAC provider collaborative meeting</li> </ul>
25	State of WI Interagency Council on Homelessness	<ul style="list-style-type: none"> <li>Public agency</li> </ul>	<ul style="list-style-type: none"> <li>HAC provider collaborative meeting</li> </ul>
26	The Women’s Center	<ul style="list-style-type: none"> <li>Domestic violence service provider</li> <li>Agency serving qualified population</li> </ul>	<ul style="list-style-type: none"> <li>HAC provider collaborative meeting</li> </ul>
30	United Health Care	<ul style="list-style-type: none"> <li>Healthcare organization</li> </ul>	<ul style="list-style-type: none"> <li>HAC provider collaborative meeting</li> </ul>
31	United Way of Greater Milwaukee & Waukesha County	<ul style="list-style-type: none"> <li>Homeless service provider</li> </ul>	<ul style="list-style-type: none"> <li>HAC board meeting</li> <li>HAC provider collaborative meeting</li> <li>Community workshop</li> </ul>
32	Washington County Community Development Department	<ul style="list-style-type: none"> <li>Public agency</li> </ul>	<ul style="list-style-type: none"> <li>Community workshop</li> </ul>
33	Waukesha County Community Development Division	<ul style="list-style-type: none"> <li>Agency serving qualified population</li> </ul>	<ul style="list-style-type: none"> <li>HAC board meeting</li> </ul>
34	Waukesha County Economic Support Services	<ul style="list-style-type: none"> <li>Agency serving qualified population</li> </ul>	<ul style="list-style-type: none"> <li>HAC provider collaborative meeting</li> </ul>
35	Waukesha County Health and Human Services	<ul style="list-style-type: none"> <li>Agency serving qualified population</li> </ul>	<ul style="list-style-type: none"> <li>HAC provider collaborative meeting</li> </ul>
36	Waukesha County Veterans Service Office	<ul style="list-style-type: none"> <li>Veterans’ group</li> </ul>	<ul style="list-style-type: none"> <li>Interview</li> </ul>
37	Waukesha Food Pantry	<ul style="list-style-type: none"> <li>Homeless service provider</li> </ul>	<ul style="list-style-type: none"> <li>HAC board meeting</li> <li>HAC provider collaborative meeting</li> </ul>

**TABLE 1 – LIST OF ORGANIZATIONS CONSULTED (CONTINUED)**

	Agency/Organization Consulted	Type of Agency/ Organization	Method of Consultation
38	Waukesha Free Clinic	<ul style="list-style-type: none"> <li>• Homeless service provider</li> </ul>	<ul style="list-style-type: none"> <li>• HAC provider collaborative meeting</li> </ul>
39	Waukesha Housing Authority	<ul style="list-style-type: none"> <li>• PHA</li> </ul>	<ul style="list-style-type: none"> <li>• HAC provider collaborative meeting</li> </ul>
40	West Bend Housing Authority	<ul style="list-style-type: none"> <li>• PHA</li> </ul>	<ul style="list-style-type: none"> <li>• Community workshop</li> </ul>

**Summarize feedback received and results of upfront consultation with these entities.**

*HAC Provider Collaborative Meetings*

Themes among the comments and recommendations received through during the HAC provider collaborative meetings are summarized below:

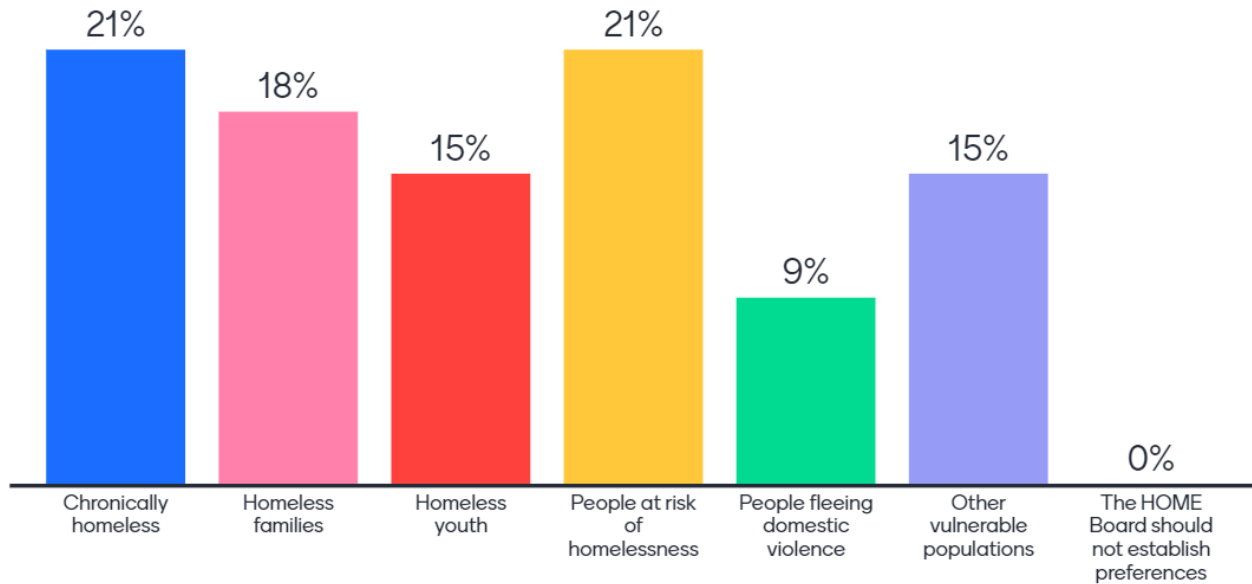
- There is a lack of affordable housing in Waukesha County and surrounding areas, including for people who have low and moderate incomes and people who are homeless. Permanent affordable housing and support services should be priorities for funding using HOME-ARP. There is a need to create new affordable housing.
- A housing navigator or counselor position is a priority. Wrap-around services that assist people maintain housing stability are important and prevent cycles of homelessness.
- In addition to housing development, consideration should be given for ongoing management, supportive services, and case management.
- While there is a definite need for more affordable housing, support for shelters should be considered as well. There is an ongoing need for more emergency shelter. In more rural areas, provision of emergency shelter and related services is more challenging. Each county has its own method of service delivery and its own unique needs.
- Tenant-based rental assistance is difficult to use because many landlords do not accept vouchers. Screenings for credit or eviction history can also be barriers for voucher holders. Landlord education may be one possibility to increase the pool of landlords that will accept vouchers.

Input regarding preferences and limitations are summarized below:

- Chronic homelessness has been an issue, particularly in Waukesha County.
- Households at risk of homelessness should also be a preferred group. We don't want to see them lose their housing stability.
- There is a need to consider project type in addition to population preference when selecting projects. For people who are chronically homeless, permanent supportive housing has been a focus rather than transitional housing. For people experiencing homelessness for the first time, rapid rehousing and homelessness prevention works well. Project selections should reflect the population the HOME Board is trying to serve.

Meeting participants were polled about potential HOME-ARP preferences, with results shown in the figure below. Preferences for chronic homelessness, people at risk of homelessness, and homeless families were top responses.

**FIGURE 1. HAC PROVIDER COLLABORATIVE MEETING PARTICIPANT RESPONSES TO “WHICH PREFERENCES SHOULD THE HOME BOARD HAVE FOR HOME-ARP FUNDING?”**



#### *HAC Board Meeting*

Themes among the comments and recommendations received through during the HAC board meeting are summarized below:

- The greatest need is to increase the number of affordable, accessible housing units. Using HOME-ARP funds for capital expenses to develop new housing that would subsequently be self-sustaining is a good use of funding.
- There is a need for partnerships with developers interested in using HOME-ARP funds to create affordable housing. The funding can be combined with other funding streams such as Low Income Housing Tax Credits (LIHTC).
- Services are also needed to complement new and existing affordable housing. Wraparound services are key for people who are chronically homeless and other is most need of support.
- New housing development should be varied so that people have a choice in where to live geographically.
- There is a need for housing for teens and young adults aging out of foster care. Flexibility in the use of funds is important to address a variety of housing needs.
- Housing for people exiting incarceration is a need. This group can be hard to house and at risk of homelessness.

*Community Workshops*

Themes deriving from the community workshops are summarized in the following section, Public Participation.

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# PUBLIC PARTICIPATION

**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 Participation during Plan Development*

The HOME Consortium encouraged public participation throughout the preparation of this HOME-ARP Allocation Plan. During development of the Plan, the Consortium held four virtual community workshops to gather input from residents and community stakeholders. Workshop dates and times are shown below:

- Thursday, June 23 at 6 PM
- Monday, June 27 at 2 PM
- Tuesday, June 28 at 6 PM
- Wednesday, June 29 at 2 PM

Each community workshop began with background about the HOME-ARP program, program objectives, eligible uses of funding, and the amount of funding the HOME Consortium expects to receive. In the second part of the meeting, participants discussed priorities for the use of HOME-ARP funding, considering rental housing, non-congregate shelter, tenant-based rental assistance, and supportive services. Attendees were invited to provide additional information by email or phone following the meeting if desired. A copy of the workshop presentation is provided in an appendix to this Plan.

## *Public Participation during Plan Review*

The HOME Consortium will hold a 15-day public comment period and a public hearing to receive input on the draft HOME-ARP Allocation Plan. Residents will be notified of the public comment period and hearing through a public notice published in the local newspaper and online. Additionally, notice will be provided by email to community stakeholders and workshop participants who shared an email address during the meetings. Dates for the public notice, public comment period, and public hearing are shown below. Following the public comment period and hearing, the Plan will be presented to the HOME Board for approval and subsequent submission to HUD.

- Dates of Public Notice: Published in paper of record 11/1/2022
- Public Comment Period: 11/1—11/16/2022
- Dates of Public Hearing: November 10, 2022 at 2 p.m. via a virtual meeting

## **Describe efforts to broaden public participation.**

The HOME Consortium endeavored to gather input from residents and community stakeholders throughout the four-county area. The Consortium held four virtual community workshops open to the general public that were advertised through a public notice in the newspaper and online. Additionally, a flyer advertising the workshops was emailed to over 200 community stakeholders, including municipalities within each county, housing and social service providers, churches, school district

representatives, and others. Recipients were also asked to share the flyer through their networks or post on social media. A total of 20 people attended one or more of the community workshops.

**Summarize the comments and recommendations received through the public participation process, either in writing or orally at a public hearing.**

Themes among the comments and recommendations received through the public participation process are summarized below:

- Affordable housing development should be a focus for the Consortium. There is a lack of affordable housing throughout the region. Even when a household has financial assistance to afford housing through something like a Section 8 voucher, finding a rental unit that is affordable and will accept a voucher is very difficult. Landlord education may be helpful to reducing this barrier.
- Production of new affordable housing units should be a primary use of HOME-ARP funds. Non-traditional approaches may be needed in more rural areas where the development of apartment communities using HOME-ARP with LIHTC funding is not feasible. New development should be accessible to people with eviction histories, poor credit or other housing barriers.
- Eviction prevention is important. Landlord-tenant mediation and other eviction prevention programs to address issues before an eviction is filed are needed. Case managers with flexible funding to help people with short-term rental assistance, childcare, transportation or other needs is also helpful.
- Non-congregate shelter does not end homelessness and should not be the highest priority for funding, but there is a need for some emergency housing. There is a specific need for shelters that house women and teens, including people leaving domestic violence situations.
- Short-term transitional housing is important because it responds to immediate needs. Affordable housing developments have long wait lists and do not make short term leases.
- Supportive services like housing navigators, social workers, and case managers are crucial. They may identify resources and options for those who cannot find immediate housing or provide long-term assistance to promote stability once someone has obtained housing.
- Resource education is important. Available programs and assistance need to be made known to the people who may need them.
- To cover a large area with a variety of needs like the HOME Consortium, flexibility is important. For example, rural areas may have more need for transportation assistance.

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

There were no comments or recommendations that were not accepted.

# NEEDS ASSESSMENT AND GAPS ANALYSIS

This needs assessment and gaps analysis evaluates the size and demographic composition of HOME-ARP qualifying populations within the HOME Consortium and assesses the unmet needs of those populations. This analysis includes both gaps in the current supply of housing and shelter units as well as gaps within the services offered by the local network of homeless assistance organizations. A variety of data sources inform this analysis, including the HOME Consortium’s recent 2020-2024 Consolidated Plan, the Continuum of Care’s point-in-time count and housing inventory counts, and consultations with service providers.

**TABLE 2 – HOMELESS NEEDS INVENTORY AND GAP ANALYSIS FOR THE FOUR-COUNTY HOME CONSORTIUM, 2022**

	Current Inventory				Homeless					Gap Analysis			
	Family		Adults Only		Vets	Homeless Population			Family		Adults Only		
	# of Beds	# of Units	# of Beds	# of Units		Individuals in Households w/ Children	Individuals in Adults-Only Households	Vets	Victims of DV	# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	67		68										
Transitional Housing	29		11										
Permanent Supportive Housing	16		4										
Other Permanent Housing													
Sheltered Homeless						215		4					
Unsheltered Homeless						22		0					
<b>Current Gap</b>										42 emergency, transitional, and permanent supportive housing beds			

Source: Institute for Community Alliances, Wisconsin Data and Reports, Point-in-Time Data, Available from: <https://icalliances.org/wisconsin-point-in-time-data>

**TABLE 3 – HOUSING NEEDS INVENTORY AND GAP ANALYSIS FOR THE FOUR-COUNTY HOME CONSORTIUM**

Non-Homeless			Gap Analysis
	Current Inventory	Level of Need	
	# of Units	# of Households	# of Households
Total Rental Units	67,319		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	3,122		
Rental Units Affordable to HH at 50% AMI (Other Populations)	14,405		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		8,886	



Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,882	
<b>Current Gaps</b>			12,768

Source: American Community Survey 2011-2015 Five-Year Estimates taken from the Waukesha County and HOME Consortium 2020-2024 Consolidated Plan

**Describe the size and demographic composition of qualifying populations within the Participating Jurisdiction’s boundaries.**

*Homeless as Defined in 24 CFR 91.5*

An estimated 237 residents were experiencing homelessness in Waukesha, Jefferson, Washington, and Ozaukee counties on a single night in January 2022, according to the 2022 Point-in-Time Count. Of the 237 people experiencing homelessness, 215 were sheltered and 22 were unsheltered. Of the 237 residents experiencing homelessness, 146 were in Waukesha County; 56 were in Washington County; 18 were in Jefferson County; and 17 were in Ozaukee County.

*At Risk of Homelessness as Defined in 24 CFR 91.5*

The most fundamental risk factor for homelessness is extreme poverty, leading to unaffordable rents or homeowner costs. Renters with incomes under 30% of the HUD Area Median Family Income (HAMFI) and housing cost burdens over 50% are at risk of homelessness, especially if they experience a destabilizing event such as a job loss, reduction in work hours, or medical emergency/condition. Such factors may also put low income homeowners at risk of foreclosure and subsequent homelessness.

The four severe housing problems include: (1) severe cost burden (paying more than 50% of income for housing and utilities); (2) severe crowding (more than 1.5 people per room); (3) lack of complete kitchen facilities; and (4) lack of complete plumbing facilities.

Income classifications include:

- Very low income – up to 30% of area median income (AMI);
- Low income – 30 to 50% AMI;
- Moderate income – 50 to 80% AMI;
- Middle income – 80 to 100% AMI.

At very low incomes, 71% of households in the four-county region experience a severe housing need (14,866 households). Hispanic residents have a disproportionately greater level of severe housing need. Eighty-four percent (84%) of Hispanic households experience one or more of the four severe housing problems.

At low incomes, 33% of households in the four-county region have at least one severe housing problem (8,132 households). Asian and Hispanic households have disproportionately greater severe needs than other racial and ethnic groups in this income band. Sixty-one percent (61%) of Asian households and 43% of Hispanic households experience at least one severe housing problem.

Of households with moderate incomes, 13.8% of all households experience one or more of the four severe housing problems. However, Black households in this income band have disproportionately greater severe housing needs, with 48% of Black households experiencing one or more of the four severe housing problems.

In the middle-income range, 6% of households in the four-county region have a severe housing problem (1,745 households). No racial or ethnic group faces a disproportionate rate of severe needs at this income level.

#### *Other Populations Requiring Services or Housing Assistance to Prevent Homelessness and Other Populations at Greatest Risk of Housing Instability, as Defined by HUD in the Notice*

##### *Elderly and Frail Elderly*

According to the 2016-2020 ACS 5-year estimates, 10.7% of the HOME Consortium region's population is elderly (aged 65 to 74) and an additional 7.8% is considered frail elderly (aged 75 and over). An estimated 17.0% of elderly residents and 41.7% of frail elderly residents in the region have a disability. Among residents aged 65 and over, ambulatory difficulties are the most common disability type (16.8% of residents aged 65 and over), followed by hearing difficulties (11.9%), and independent living difficulties (9.8%). Cognitive, self-care, and vision difficulties are less common, impacting 5.4%, 5.3%, and 3.4% of residents aged 65 and over, respectively.

Of the four counties, Waukesha County has the highest disability rate among residents aged 65 and over (28.1%), followed by Jefferson County (28.0%), and Washington County (27.5%). In Ozaukee County, a significantly lower share of residents aged 65 and over have disabilities (22.4%).

The senior population is forecast to increase substantially in the next five years. Need for affordable senior housing, homeownership rehabilitation and accessibility improvements, senior facilities, and services such as meal delivery and transportation assistance will also increase as this population grows.

##### *People with HIV/AIDS*

The Wisconsin Department of Health report on HIV in Wisconsin states that a total of 7,185 people known to be living with HIV resided in Wisconsin at the end of 2018, and an estimated 1,300 additional people may be living with HIV in the state but are not currently aware of their diagnosis.

The prevalence of HIV in the region is estimated at 53.3 per 100,000 residents in Jefferson County, 48.1 per 100,000 residents in Waukesha County, 43.8 per 100,000 residents in Washington County, and 37.7 per 100,000 residents in Ozaukee County.<sup>1</sup>

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<sup>1</sup> Centers for Disease Control and Prevention. (2020). HIV prevalence | 2020 (COVID-19 Pandemic). Retrieved from: <https://www.cdc.gov/nchhstp/atlas/index.htm>

### People with Substance Use Disorders

An annual survey sponsored by the U.S. Substance Abuse and Mental Health Services Administration (SAMHSA) provides the primary source of information on the use of illicit drugs and alcohol among non-institutionalized persons aged 12 years old or older. The 2018-2019 survey estimates that there are approximately 358,000 people aged 18 and over in Wisconsin with a substance use disorder (7.9% of the population aged 18 or older). Of these, an estimated 292,000 have an alcohol use disorder, 114,000 have an illicit drug use disorder, and 23,000 have a pain reliver use disorder.<sup>2</sup> Extrapolating these figures to the four-county region’s population, approximately 44,152 residents aged 18 and over may have a substance dependence or abuse disorder.

### 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.

#### Homeless Facilities and Services

Based on a review of emergency, transitional, and permanent supportive housing that serves homeless persons in the HOME Consortium region, there are an estimated 135 year-round emergency shelter beds in Waukesha County, about half of which are family beds (67 beds) and half of which are individual beds (68 beds). An additional 25 beds provide emergency shelter on a seasonal basis. The County’s homeless facilities also includes 40 transitional housing beds and 20 permanent housing beds.

Outside of Waukesha County facilities and resources for homeless individuals and families are more limited. Friends, Inc. in Washington County provides emergency shelter and transitional housing assistance for those affected by domestic or sexual violence. Family Promise of Waukesha County provides emergency shelter and supportive services. Family Promise of Washington County provides emergency shelter and supportive housing at its Karl’s Place facility. Family Promise of Ozaukee County also assists with emergency housing for homeless families.

Agencies that provide services and facilities for homeless individuals and families are listed below along with the service they provide and the target population they serve.

**TABLE 4 – AGENCIES PROVIDING HOUSING AND SERVICES FOR HOMELESS PERSONS**

Agency	Services	Target Population
Hope Center	Clothing shop, meals, day center, financial assistance, moving and furniture assistance	All homeless
Food Pantry of Waukesha	Food distribution	All homeless
Salvation Army	Food pantry, community meals, emergency shelter, utility and prescription assistance, disaster relief	All homeless Men
La Casa de Esperanza	Childcare	Women and children

<sup>2</sup> Substance Abuse and Mental Health Services Administration, State data tables and reports from the 2018-2019 National Survey on Drug Use and Health (NSDUH), U.S. Department of Health and Human Services, <https://www.samhsa.gov/data/report/2018-2019-nsduh-state-specific-tables>

Agency	Services	Target Population
Women's Center	Emergency housing, transitional housing, childcare, legal advocacy, employment assistance, counseling, crisis hotline	Victims of domestic violence
Community Action Coalition of South Central Wisconsin	Transitional housing assistance, emergency shelter vouchers, rapid rehousing, case management, phone/internet assistance, food distribution	All homeless Chronically homeless Veterans
Hebron House of Hospitality	Emergency shelter, transitional housing, case management, advocacy	Women and children Men
St. Vincent de Paul	Community meals, after release jail ministry, financial assistance	All homeless Persons released from correctional facilities
Waukesha Free Clinic	Medical services, care for chronic conditions	All homeless
Housing Action Coalition	Emergency housing, resource center	All homeless
Parent's Place	Prevention, intervention and education services for children who are at risk or have experienced child abuse and neglect	Children
Friend's, Inc.	Emergency shelter, transitional housing assistance, crisis hotline, advocacy, legal services, counseling/support groups	Victims of domestic violence
Family Promise	Emergency shelter, transitional housing, day center, meals	All homeless families

### *Public and Assisted Housing*

Public housing is concentrated in the counties of Waukesha and Jefferson. There is a total of 465 subsidized units available in these communities with Waukesha County having the largest number (263). Other subsidized housing, such as low-income tax credit projects and units for elderly and disabled adults are available throughout the jurisdiction.

The Waukesha Housing Authority (WHA) manages one large complex and several scattered sites. Saratoga Heights contains 114 one-bedroom units, and there are 149 additional scattered sites, ranging from two to five-bedroom units. The Jefferson Housing Authority (JHA) also manages one large complex and scattered sites, for a total of 61 units. The Watertown Housing Authority and Lake Mills Housing Authority in Jefferson County also manage public housing units.

Additional assisted housing in the region includes Low Income Housing Tax Credit (LIHTC) properties, properties supported by Project-Based Section 8 subsidies, and Housing Choice Vouchers.

According to HUD's LIHTC database, there are 72 tax credit properties in the HOME Consortium region that together provide 2,539 units of housing affordable to households with incomes at or below 60% AMI. There are 2,459 Project Based Section 8 units in 41 developments and 137 other multifamily assisted

housing units in 8 developments. Other multifamily properties include housing developed through HUD's Section 202 and 811 programs, which focused on providing affordable supportive housing for the seniors and people with disabilities.

The Housing Action Coalition of Waukesha County is comprised of more than 20 local agencies working to prevent and respond to homelessness in Waukesha County through provision of housing and services, including for chronically homeless individuals, families with children, veterans and their families, and unaccompanied youth. Using CDBG funding, Waukesha County provides support to several housing and service providers dedicated to serving people experiencing homelessness. During the 2020 program year, these include:

- The Hope Center – programs include a free clothing shop, outreach meals, a day center for people who are homeless and others, transportation assistance, healthcare access assistance, and assistance moving from a shelter to a family residence.
- The Women's Center – serves women, children, and men impacted by domestic abuse, sexual violence, child abuse, and trafficking with emergency shelter, transitional housing, counseling support, childcare, legal advocacy, and employment counseling. The Women's Center also provides community education about violence prevention.
- Hebron Housing Services – provides housing, services, and case management for men, women, children, and families, including people who are chronically homeless.
- The Salvation Army – provides emergency shelter, assistance finding housing, and other case management for men who are homeless.

#### *Shelter and Housing Inventory Gaps*

The HOME Consortium works with the Housing Action Coalition and other community partners to collaborate on projects that provide services to people experiencing homelessness and other special needs populations. Designation of Neighborhood Strategy Revitalization Areas (NRSAs) allows the counties flexibility in addressing economic development, housing, and public services, including allowing additional public service funding for organizations that serve homeless and other special needs populations within NRSAs.

While there are many organizations in the Consortium counties serving people who are homeless and other special needs populations, service delivery gaps exist due to limited funding and a lack of sufficient permanent affordable housing or Section 8 vouchers. Without a sufficient affordable supply, housing navigators and case managers have difficulty connecting clients to long-term housing. Additional barriers to housing access may include past evictions, past convictions, high security deposits, or, for larger families, inability to find suitably-sized units. Additional resources are also needed to provide services, including free or low-cost healthcare, childcare, or transportation. Stakeholders also noted the need for legal assistance, most specifically, for eviction prevention.

The HOME Consortium will continue outreach efforts to strengthen collaboration and expand understanding of the HOME program among community organizations, service providers, and housing developers.

## **Describe the unmet housing and service needs of qualifying populations.**

### *Residents who are Homeless or At-Risk of Homelessness*

Individuals with an imminent risk of residing in shelters or becoming unsheltered typically have a combination of financial factors present in their lives: lack of living wage jobs, rents that are more than 30 or 50% of their incomes, and unaffordable childcare, medical, or transportation costs. In addition to these factors, individuals at risk of homelessness may have additional issues present such as family conflicts, domestic violence, housing with code or safety violations, household members with a disability, criminal histories, histories of mental health issues or substance abuse, difficulty navigating systems to access public benefits or community services, temporary housing situations (couch surfing or doubling up), and prior experiences with homelessness.

For formerly homeless families and individuals nearing the termination of assistance, a top need is to secure safe, affordable permanent housing. Other needs may include access to job training, employment and education programs, including supportive employment agencies; access to Social Security disability and other benefits; linkages to health, mental health, and legal services; access to affordable transportation, childcare, and food; and other case management and supportive services.

The HOME Consortium works the Housing Action Coalition and other community partners to collaborate on projects that provide services to people experiencing homelessness and other special needs populations. Designation of Neighborhood Strategy Revitalization Areas (NRSAs) allow the counties flexibility in addressing economic development, housing, and public services, including allowing additional public service funding for organizations that serve homeless and other special needs populations within NRSAs.

While there are many organizations in the HOME Consortium counties serving people who are homeless and other special needs populations, service delivery gaps exist due to limited funding and a lack of sufficient permanent affordable housing or Section 8 vouchers. Without a sufficient affordable supply, housing navigators and case managers have difficulty connecting clients to long-term housing. Additional barriers to housing access may include past evictions, past convictions, high security deposits, or, for larger families, inability to find suitably-sized units. Additional resources are also needed to provide services, including free or low-cost healthcare, childcare, or transportation. Stakeholders also noted the need for legal assistance, most specifically, for eviction prevention.

### *Other Special Needs Populations*

Special needs populations that may be at risk of housing instability have housing and service needs, including:

The primary housing and supportive needs of these subpopulations (the elderly, frail elderly, persons with disabilities, persons with HIV/AIDS and their families, persons with alcohol or drug addiction, victims of domestic violence, and persons with a criminal record and their families) were determined by input from both service providers and the public through the survey, public meetings, and stakeholder interviews. These needs include access to healthcare; affordable, safe housing opportunities in areas with access to transportation, commercial and job centers; social services including counseling, case management, and other services and facilities; and safe streets and sidewalks.

Needs of older adults and persons with disabilities include access to healthcare, shopping, recreation; accessibility, walkability, and safety; transportation that is accessible, affordable and flexible; housing stock that is diverse, affordable, safe and not segregated; and access to information and services that is well-marketed. In particular, evidence-based services and support are needed for frail older adults, persons with disabilities, and persons with Alzheimer’s disease and dementia and their caregivers; long-term supports and services to help older adults and persons with disabilities remain in the community; opportunities for social engagement and health through senior centers; screening and treatment to appropriate behavioral health interventions for older adults and persons with disabilities; and expanded housing options near services that can support quality of life for persons of all ages and abilities. Persons with disabilities in particular often require accessible features and ground floor housing units and use of supportive/therapeutic animals.

Additional subpopulations have specific needs:

- Victims of domestic violence need safe housing, removal of barriers to relocation, and protection from perpetrators.
- Persons with criminal records and their families may be disqualified from public housing or Housing Choice Voucher assistance, and accordingly, assistance with housing for low-income members of this subpopulation must be provided by other nongovernmental organizations.
- Refugee populations will need assistance in becoming self-sufficient as the number of refugees entering the United States and the HOME Consortium counties continues. Programming and infrastructure to meet the needs of this low-income population will be necessary to ensure self-sufficiency, sustainability and growth. Refugee populations often need support with physical and mental health services, counseling, skills training, food and healthcare assistance, legal resources, and support in accessing available resources.

**Under Section IV.4.2.ii.G of the HOME-ARP Notice, a Participating Jurisdiction may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other population” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here.**

To assess affordability and other types of housing needs, HUD defines four housing problems:

- Cost burden: A household has a cost burden if its monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
- Overcrowding: A household is overcrowded if there is more than one person per room, not including kitchens and bathrooms.
- Lack of complete kitchen facilities: A household lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, refrigerator, or a sink with piped water.
- Lack of complete plumbing facilities: A household lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly household income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (as described above).

Cost burden is the most common housing problem in the HOME Consortium region. Sixty percent of households earning below 80% AMI (\$55,818) are also cost burdened. Of those who are cost burdened in the region, 83.3% have very low incomes. In the very low-income band, most cost burdened households belong to renters (60%). Low income households are cost burdened only slightly more as renters than as owners, constituting 52.8% and 47.1% of low-income households respectively. Cost burdens have a greater effect on homeowners with higher incomes. Two-thirds of cost burdened owners have moderate incomes. Severe cost burdens affected 31.3% of households earning under 80% AMI in the region. Very low income households constitute 70% of households with severe cost burdens.

While the primary housing issue facing low- and moderate-income residents is affordability, households also in the region also experience overcrowding and substandard housing. In the four-county region, 1,426 households are affected by substandard housing and 1,553 households are affected by overcrowding or severe overcrowding.<sup>3</sup> In the four-county region, an estimated 380 owner households and 1,285 renter households lack complete kitchen or plumbing facilities. While these numbers represent fewer than 1% of households in each county, Jefferson County has the greatest proportion of households lacking complete kitchen or plumbing facilities (0.8% of all households).

An additional 1,050 owner households and 742 renter households in the region are either overcrowded or severely overcrowded. Households in Jefferson County and Ozaukee County experience the highest rates of overcrowding or severe overcrowding in the region (1.1% and 0.8% of households, respectively).

Jefferson County's 2021 Housing Report<sup>4</sup> notes that in 2018 the county had 7,766 households (23%) classified as ALICE (Asset Limited, Income Constrained, Employed) and an additional 2,741 households (8%) that fall below the Federal Poverty Level.<sup>5</sup> The ALICE data analyzed in the report suggest that a household with two adults and two school age children making less than \$56,976 a year would struggle to find adequate housing they can afford for their family size.

### **Identify priority needs for qualifying populations.**

Priority needs for qualifying populations include:

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<sup>3</sup> A household is overcrowded if there are more than one person per room, not including kitchens and bathrooms. A household is severely overcrowded if there are more than 1.5 people per room, not including kitchens and bathrooms.

<sup>4</sup> University of Wisconsin Whitewater College of Business and Economics. (2021). Jefferson County Housing Report: An Analysis of Jefferson County and Its Municipalities. Retrieved from: <https://www.whitewater-wi.gov/DocumentCenter/View/2374/2021-Jefferson-County-Housing-Report>

<sup>5</sup> Based on calculations from the American Community Survey and the ALICE Threshold in 2018



- Emergency and transitional housing (non-congregate shelter) with wraparound services for people experiencing homelessness;
- Affordable housing;
- Supportive services, including mental health services, employment services, housing navigation, case management, and other wrap-around services; and
- Homelessness prevention services, including rent and utility assistance.

**Explain how the Participating Jurisdiction determined the level of need and gaps in the Participating Jurisdiction’s shelter and housing inventory and service delivery systems based on the data presented in the plan.**

The level of need and gaps in shelter and housing inventory were determined using the Homeless Needs Inventory and Housing Need Inventory tables, information in the County’s 2020-2024 Consolidated Plan, and consultation with housing and service providers.

Data from the 2022 Point-in-Time and Housing Inventory counts indicates that there were 237 people experiencing homelessness in Waukesha, Jefferson, Washington, and Ozaukee counties and just 195 emergency, transitional, and permanent housing beds available, indicating a gap of 42 emergency shelter, transitional housing, and permanent supportive housing beds.

The Housing Needs Inventory indicates that 12,768 renter households with incomes of 50% AMI and below have severe housing problems, which may include lacking kitchen or complete plumbing, severe overcrowding, or severe cost burden.

The gaps in the service delivery system were determined through focus groups with housing and service providers, stakeholder interviews, and public meetings conducted during the HOME-ARP and 2020-2024 Consolidated Plan community engagement processes.

# HOME-ARP ACTIVITIES

**Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors.**

The HOME Consortium will carry out HOME-ARP activities, including affordable housing development, supportive services, and non-congregate shelter acquisition/development, through partnerships with residential developers and homeless housing and service providers. The HOME Consortium anticipates holding one or more competitive grant application processes to identify partners best able to meet the Consortium's goals and preferences as outlined in this Plan – including the mix of housing production, service provision, and non-congregate shelter development identified in Table 5.

The Community Development Division of the Waukesha County Parks and Land Use Department will coordinate the grant funding application process for the Consortium. Applications will be reviewed and scored by the HOME Consortium Board of Directors, a 12-member body with representatives from Jefferson, Ozaukee, Washington, and Waukesha Counties, to identify those most suitable for funding. The Community Development Division will manage subrecipient grants, including required monitoring and reporting for HOME-ARP activities.

The HOME Consortium uses a similar competitive process to allocate annual HOME grant funds for affordable rental housing development and Community Housing Development Organizations (CHDOs). Additionally, Waukesha County's Community Development Division leads a parallel process each year to allocate CDBG public service funds in Waukesha County.

**Describe whether the Participating Jurisdiction will administer eligible activities directly.**

The HOME Consortium anticipates using HOME-ARP funds to make subgrants to a variety of subrecipients for housing production, homeless services, and non-congregate shelter.

**If any portion of the Participating Jurisdiction's HOME-ARP administrative funds are 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 Participating Jurisdiction's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the Participating Jurisdiction's HOME-ARP program.**

Not applicable. The Consortium will not allocate funds to a subrecipient or contractor to administer the entire HOME-ARP grant.

**TABLE 5 – USE OF HOME-ARP FUNDING**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>
Supportive Services	\$794,000	15%
Acquisition and Development of Non-Congregate Shelters	\$794,000	15%
Tenant-Based Rental Assistance (TBRA)	\$0	0%
Development of Affordable Rental Housing	\$2,911,334	55%
Non-Profit Operating	\$132,333	2.5%
Non-Profit Capacity Building	\$132,333	2.5%
Administration and Planning	\$529,334	10%
<b>Total HOME ARP Allocation</b>	<b>\$5,293,334</b>	<b>100%</b>

**Describe how the Participating Jurisdiction will distribute HOME-ARP funds in accordance with its priority needs identified in the needs assessment and gap analysis.**

The HOME Consortium will allocate the largest share of its funding (55%) toward the development of affordable rental housing. The development of affordable rental housing was consistently identified as a priority by community stakeholders and the gap analysis reveals a shortage of affordable rental units in the four-county area. Service needs were the second most commonly identified need amongst community stakeholders. Participants commonly discussed the need for wrap around services as a key component for maintaining housing stability and preventing returns to homelessness. While non-congregate shelter was not identified as a priority as frequently as housing development and supportive services, several stakeholders noted a continued need for shelter in the four-county area, including shelters that serve women and teens. TBRA was not generally identified as a HOME-ARP priority, with many stakeholders noting a difficulty using existing housing vouchers due to high housing cost and low rates of acceptance by landlords. In addition, there is an already existing HOME funded TBRA program that operates in all four counties.

# HOME-ARP PRODUCTION HOUSING GOALS

**Estimate the number of affordable rental housing units for qualifying populations that the Participating Jurisdiction will produce or support with its HOME-ARP allocation.**

The HOME Consortium estimates that it will support the production of approximately 50 affordable rental units and 10 non-congregate shelter units using HOME-ARP funding. The Consortium will work to develop as many new affordable rental and non-congregate shelter units as possible, however, totals will depend on the applications received, the types of developments proposed, and development costs.

**Describe the specific affordable housing production goals that the Participating Jurisdiction hopes to achieve and describe how the production goal will address the Participating Jurisdiction's priority needs.**

The HOME Consortium's priority needs for HOME-ARP qualifying populations include:

- Affordable rental housing;
- Emergency and transitional housing (non-congregate shelter) with wraparound services; and
- Supportive services including housing navigation, homelessness prevention, mental health services, case management, and flexible spending pools to respond to individual households' needs.

By adding 50 new affordable rental units and 10 non-congregate shelter units and connecting households within these units to wraparound services, the HOME-ARP funds will help reduce the current gap of 42 emergency/transitional housing beds and 12,768 affordable rental units.

# PREFERENCES

**Identify whether the Participating Jurisdiction intends to give preference to one or more qualifying population or a subpopulation within one or more qualifying populations for any eligible activity or project.**

The HOME Consortium covers a large geography with varying levels of need and resources related to homelessness. In selecting projects and services for HOME-ARP funding, the Consortium will consider a variety of activity types in areas throughout the four-county region.

While all qualifying populations will be eligible for HOME-ARP funded projects, the HOME Consortium anticipates using the following preferences as one of several factors determining project selection:

- Activities that preference chronically homeless persons (as a subpopulation of the “homeless” qualifying population);
- Activities that preference people at risk of homelessness (one of the qualifying populations); and
- Activities that preference homeless families (as a subpopulation of the “homeless” qualifying population).

The HOME Consortium may also select to fund housing development, non-congregate shelter, or service projects that do not have a preference among HOME-ARP qualifying populations.

In applying these preferences, the Consortium will act in compliance with all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). Eligibility and selection of applicants will be determined without regard to an applicant's race, color, religion, sex (including gender identity and sexual orientation), disability, familial status, or national origin.

**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 subpopulation of qualifying population, consistent with the Participating Jurisdiction’s needs assessment and gap analysis.**

Preferences reflect the input received from homeless housing and service providers operating in the HOME Consortium area. Asked to prioritize different populations for targeting with HOME-ARP grant funding, providers most frequently identified people who are chronically homeless, people at risk of homelessness, and homeless families. Stakeholders also noted that these priorities may depend on geography within the HOME Consortium. For example, people who are chronically homeless were mentioned as a preference in Waukesha County and homeless families as a preference in Washington County and other more rural areas.

Resources for people at risk of homelessness – including stabilization services and homelessness prevention – was mentioned as a need throughout the Consortium area. According to HUD housing data,

about 71% of households (14,866 households) in the region with incomes under 30% of the area median income have a severe housing need, meaning that they spend more than 50% of their income for housing, are severely overcrowded or live in substandard housing.

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## REFERRAL METHODS

**Identify the referral methods that the Participating Jurisdiction intends to use for its HOME-ARP projects and activities. Participating Jurisdictions may use multiple referral methods in its HOME-ARP program.**

The HOME Consortium anticipates that referrals for its HOME-ARP projects with preferences will be generated from the network of housing and social service agencies operating in the four-county region. HOME-funded housing developments, non-congregate shelters, or service providers with projects with preferences shall maintain activity-specific waiting lists that prioritize target populations, followed by other qualifying populations, on a first-come, first-served basis. As part of the project selection process, the HOME Consortium will ask applicants their anticipated plan for receiving referrals and managing waiting lists to serve eligible qualifying populations and meet other HOME-ARP requirements.

**If the Participating Jurisdiction intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered.**

Not applicable.

**If the Participating Jurisdiction intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE.**

Not applicable.

**If the Participating Jurisdiction intends to use both a CE process established by the CoC and another referral method for a project to activity, describe any method of prioritization between the two referral methods, if any.**

Not applicable.

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## LIMITATIONS IN A HOME-ARP RENTAL HOUSING OR NCS PROJECT

**Describe whether the Participating Jurisdiction intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in Section IV.A of the Notice.**

The HOME Consortium does not intend to limit eligibility for HOME-ARP rental housing or non-congregate shelter projects to particular qualifying populations or subpopulations.

**If a Participating Jurisdiction intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the Participating Jurisdiction’s needs assessment and gap analysis.**

Not applicable. The HOME Consortium does not intend to limit eligibility for HOME-ARP rental housing or non-congregate shelter projects to particular qualifying populations or subpopulations.

**If a limitation was identified, describe how the Participating Jurisdiction will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the Participating Jurisdiction’s HOME-ARP projects or activities).**

Not applicable. The HOME Consortium does not intend to limit eligibility for HOME-ARP rental housing or non-congregate shelter projects to particular qualifying populations or subpopulations.

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# HOME-ARP REFINANCING GUIDELINES

If the Participating Jurisdiction intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the Participating Jurisdiction must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the Participating Jurisdiction will refinance existing debt for a HOME-ARP rental project, including:

- Establishing 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 Participating Jurisdiction's guidelines, if applicable.

The HOME Consortium will not use HOME-ARP funds to refinance existing debt and therefore does not establish any HOME-ARP refinancing guidelines in this plan. The above conditions and requirements are not applicable.