



**Urbana HOME Consortium
HOME-ARP Allocation Plan
July 2022**

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HOME-ARP Allocation Plan Template with Guidance

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: Requirements of the Use of Funds in the HOME-American Rescue Plan Program, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

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Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- *CoC(s) serving the jurisdiction's geographic area,*
- *homeless service providers,*
- *domestic violence service providers,*
- *veterans' groups,*
- *public housing agencies (PHAs),*
- *public agencies that address the needs of the qualifying populations, and*
- *public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.*

State PJs are not required to consult with every PHA or CoC within the state's boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Template:

Describe the consultation process including methods used and dates of consultation:

Urbana HOME Consortium staff and consultant identified 22 organizations—including public agencies, service providers, and nonprofit organizations—that represented all of the consultation requirements above and provided a comprehensive picture of the needs of HOME-ARP qualified populations. Staff at these organizations were contacted, and a brief video interview was conducted, asking about the organization's work with Qualified Populations, existing gaps in service to these populations (both internal to the organization and in the general local service provision), and demographics or eligible programs that should be prioritized for HOME-ARP funding. Written notes were taken during these interviews. Out of the 22 organizations contacted for interviews, interviews were able to be conducted with 20.

Additionally, the consultation interview questions were turned into an online survey that was distributed to the mailing list for the continuum of care, enabling other service provider organizations who weren't prioritized for an in-person interview to also provide their insight. This online survey resulted in seven additional responses including two organizations that weren't reflected in in-person interviews.

The interview consultations took place from March 23, 2022, to April 26, 2022. The online survey consultation was open from April 11, 2022, to May 31, 2022.

Consultation summaries below encompass the feedback from relevant and knowledgeable staff members at these organizations. However, they should not be construed as official statements representing the organization.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Champaign County Continuum of Service Providers to the Homeless	Continuum of Care	Video Interview	Due to the small size of our continuum, one major gap is simply the capacity to effectively address both emergency shelter and permanent housing needs simultaneously. Non-congregate, low-barrier, permanent emergency shelter is a major gap in current services. Additionally, finding ways to encourage landlords to accept rental assistance, and quickly guiding shelter clients into rapid rehousing and permanent supportive housing are other gaps. The LGBTQ+ population should be a priority, to provide options where these individuals feel comfortable and are able to address common housing instability issues. In addition, single individuals, despite representing a critical need in the local homeless system, are not as highly prioritized in current services as families or other populations. All HOME-ARP funding categories are needed, but particular priority should be given to permanent supportive housing, programs that facilitate the rapid transition of clients out of shelters and into PSH, and tying supportive services into existing programs more extensively.
C-U at Home	Homeless Service Provider	Video Interview	The most significant gaps include the lack of 24-hour shelter facilities, which provides a lot of time for the homeless to be in unstable situations; the need for greater supportive services for clients; increasing bed/space capacity to serve all in need of emergency shelter; and providing facilities or collaborations to address the various needs of the homeless population (including high need populations like those with substance abuse, mental health, or significant medical issues). Due to their overlapping and compounding needs, the chronically homeless should be prioritized, providing the extensive services, in addition to shelter, that

			<p>this group often needs. Supportive services and non-congregate shelter—especially when implemented together—should be HOME-ARP spending priorities, and could help address the needs of emergency shelter clients who are not prepared to live on their own and need greater support.</p>
<p>Cunningham Children’s Home</p>	<p>Homeless Service Provider</p>	<p>Video Interview</p>	<p>Undersupply of local affordable housing (both subsidized and unsubsidized) is a significant gap, making housing difficult to afford even for the lower end of the workforce. Additional gaps include difficulty for clients in acquiring paperwork and navigating systems, shelter options for families, and the seasonal closure of the low-barrier shelter, leading to more individuals sleeping outside. Vulnerable residents who don't meet the strict definition of homelessness are a currently underserved group; directing funding to them would allow for their needs to be met before they get to the point of homelessness. Affordable housing and non-congregate shelter are priority programs for HOME-ARP spending, in order to directly meet the need for shelter and get vulnerable populations off the street.</p>
<p>The Salvation Army</p>	<p>Homeless Service Provider, Veterans’ Group</p>	<p>Phone Interview</p>	<p>Major local gaps include securing funding to have the capacity to serve existing needs, and providing resources to ensure clearer communication between service providers, so they can most effectively perform their work. Individuals who have been previously incarcerated should be a priority, providing housing stability so that they can get back on their feet. Non-congregate shelter should be prioritized for funding, followed by rental assistance (keeping people in the housing that they already have), supportive services, and affordable housing.</p>
<p>Habitat for Humanity of Champaign County</p>		<p>Video Interview</p>	<p>Affordable rental (and owner-occupied) housing is a major local gap, especially with local speculation by institutional investors. ALICE (Asset Limited, Income Constrained, Employed) families and other low-income members of the workforce struggle in our community and should be considered when</p>

			allocating funding. Affordable housing should be priority number one for HOME-ARP spending.
Courage Connection	Domestic Violence Service Provider	Video Interview	Major gaps in current services include the logistics (including timelines) for getting clients support after they are in a shelter, as well as the availability of safe, quality rental housing where TBRA is accepted. Homeless women and children should be a priority population for this funding, in order to meet the gaps in current resources for these populations (including single women being underserved). HOME-ARP funds should be used to foster greater partnerships between local service providers; all four of the HOME-ARP eligible activities are important for providing an infrastructure to address needs effectively and improve lifelong impacts for clients.
Crisis Nursery	Domestic Violence Service Provider, Homeless Service Provider	Video Interview	There is a huge gap in emergency support for homeless families. Kids and families should be the priority population for HOME-ARP funds, providing options where parents and children don't need to be separated to receive shelter. Additionally, the needs in rural communities are often hidden and need to be considered. Funding should prioritize supportive services in order to meet the underlying needs of individuals, as well as non-congregate shelter, to provide the needed flexibility of emergency housing for different household types.
Department of Veteran's Affairs	Veterans' Group, Public Agency, Homeless Service Provider	Video Interview	Major service gaps include the lack of safe and affordable housing, as well as the income cutoffs that clients experience with existing programs, making it hard to build up income without having assistance taken away. Underserved populations that should receive priority include those on the sex offender registry, families (both in finding sufficient units and providing shelter options for families), and institutionalized youth who are aging out of the system. All four of the HOME-ARP eligible programming areas meet important local needs; in particular, supportive services across housing types

			(shelter, voucher holders, affordable housing) help to ensure the success of individuals in these programs.
Housing Authority of Champaign County	Public Housing Agency	Video Interview	Creating greater connection and collaboration with private landlords is a major current gap. In addition, supportive structures for new voucher recipients as they seek out rental housing—including assistance with application fees—are needed, and the authority would like to provide ways to place voucher holders in higher opportunity neighborhoods. Externally, the largest gaps are the shortage of affordable, quality rental housing in the area, as well as the extensive processes that individuals have to go through to get assistance. The literally homeless should be the primary priority group for HOME-ARP funding, followed by families with housing instability, who are often not served well by existing programs or housing stock. Regarding programs for funding, providing a non-congregate or SRO-model facility to address the needs of the literally homeless, followed by rental assistance with supportive services, would be the most effective use of these funds.
Cunningham Township	Public Agency	In-Person Interview	Major current gaps include finding stable affordable housing for Social Security assistance recipients, serving the needs of homeless women and LGBTQ individuals, providing year-round and 24/7 shelter (including for the low-barrier population), services for families with disabled heads of household, and an SRO model of housing. Priority populations for HOME-ARP funds include women (especially those suffering from mental illness, as they are extremely vulnerable to sexual violence), disabled heads of households, and medically fragile homeless individuals. Program priorities for the funding include non-congregate shelter (especially for women and survivors of sexual and physical assault), with supportive services incorporated. Additionally, leveling up affordable housing and supportive services infrastructure should be prioritized;

			rental assistance is important, but it is a short-term strategy for problems that also need long-term investment.
Champaign County Regional Planning Commission	Public Agency	In-Person Interview	Existing gaps include transportation for clients (especially those living in rural areas), providing services to those at risk of homelessness who don't meet specific qualifications for homeless funds, individuals released from medical care for whom congregate shelter is not appropriate, and more intensive case management (like substance abuse services) to help clients maintain stability in long-term housing. Disabled individuals should be prioritized for services from HOME-ARP funds, especially given the length of time it can take to receive regular Social Security benefits and the instability before they receive those. Supportive services and non-congregate shelter should be prioritized from the funding, to help clients transition into stability, in addition to quality, well-maintained affordable housing.
City of Champaign	Public Agency	Video Interview	Significant gaps include year-round, low-barrier emergency shelter for both genders, as well as mental health and substance abuse treatment. The chronically homeless are a priority population, particularly, investments in getting them into permanent housing with supportive services, and providing options for the chronically difficult to house. HOME-ARP provides a unique opportunity to invest in non-congregate shelter and supportive services.
City of Champaign Township	Public Agency	Video Interview, Survey	The decrease in funding as COVID-era programs end will present a gap from the current services being offered. Red tape between organizations and jurisdictions can prevent effective collaboration. Staffing and capacity present barriers, especially for administering programs with extensive reporting requirements. Young mothers struggling to balance childcare with employment and increasing their income are a population with significant needs. Rental assistance, constructing more affordable

			housing, and providing non-congregate shelter should be the priorities, in that order, for HOME-ARP funding.
City of Urbana	Public Agency	Video Interview, Survey	Staff capacity is one of the biggest needs, to manage grants and other available opportunities. In addition, building collaboration with landlords to make the most effective use of TBRA funding is a gap that needs to be addressed. The chronically homeless are a priority population for HOME-ARP funding, in addition to providing long-term housing options for individuals, and serving high-need individuals (like those with mental health and substance abuse issues). This funding should prioritize supportive services and non-congregate shelter, providing additional resources for emergency shelter and wrap-around services to help achieve stability.
Developmental Services Center	Organization Addressing the Needs of Persons with Disabilities	Video Interview	Current gaps include the need for more temporary assistance programs for those at risk of homelessness or housing instability, a general shortage of quality affordable housing for low-income households, and insufficient capacity for the case management needs that exist. The developmentally disabled should be prioritized for HOME-ARP funds, in addition to those with mental illness, who often come to DSC but are unable to be served (either because of lack of developmental disability or because the client has a dual diagnosis but their mental health needs are more substantial and out of DSC’s wheelhouse). Supportive services would be the most effective program category for HOME-ARP funding, allowing individuals to maintain stability, while affordable housing should also be given high priority.
Community Choices	Organization Addressing the Needs of Persons with Disabilities	Survey	Significant gaps include affordable living situations for those living off of Social Security payments, difficulty in placing tenants with vouchers, and funds for staffing generally and especially staffing for direct support to assist clients with day-to-day

			needs. In addition, the difficulty in navigating the service system is a gap for all populations, not solely those with disabilities. People with intellectual and developmental disabilities should be prioritized for HOME-ARP funding, due to their vulnerability and need for direct support. Supportive services should be prioritized, particularly funding to pay and train direct support workers for those with intellectual or developmental disabilities.
First Followers	Organization Addressing Fair Housing, Civil Rights	Video Interview	Temporary housing is a current gap for their clients (the formerly incarcerated), especially meeting the need for shelter while clients are applying for other assistance. Additionally, both private landlords and shelter providers may be unwilling to serve their clients, due to criminal history or current needs. Priority for HOME-ARP funds should go to anyone below the poverty line, as housing insecurity from cost burden or difficulty finding rental housing makes any kind of stability very difficult. All programming types are important, but priority should go to non-congregate shelter (a larger investment with long-term benefits) and rental assistance (a quickly actionable program). Spending of HOME-ARP money should balance immediate needs with long-term investment.
Greater Community AIDS Project of East Central Illinois	Homeless Service Provider, Organization Addressing Fair Housing, Civil Rights, or the Needs of Persons with Disabilities	Video Interview	The inability to serve individuals on the sex offender registry is a significant gap, in addition to offering continuing supportive services to make sure that clients who move into long-term housing can retain stability. Low-income populations, including those surviving off of Social Security, are a major priority group, as it is difficult for them to prove sufficient income for the private rental screening process. For HOME-ARP activity priorities, TBRA coupled with supportive services are the uses that will meet the most immediate needs. SRO and affordable housing facilities are nonetheless still important, even if they're more long-term.

<p>Land of Lincoln Legal Aid</p>	<p>Organization Addressing Fair Housing, Civil Rights</p>	<p>Video Interview, Survey</p>	<p>Staffing is a major internal issue—working to provide case workers for clients, in addition to legal counsel. Lack of safe and affordable housing is the major gap in the area, with renters facing both difficulties paying for housing and substandard housing conditions. Move-in funding and emergency rent assistance would help avoid evictions or help those in the process to secure new housing. If prioritizing populations for HOME-ARP funding, consideration should be given to geographic or neighborhood-level priorities, providing resources to disinvested areas, in addition to those in the process of applying for disability who have not yet secured this money. Programming priority should be given first to developing affordable housing and non-congregate shelter, followed by rental assistance (including incentives for, and further collaboration with, landlords).</p>
<p>LGBT Resource Center, UIUC</p>	<p>Organization Addressing Civil Rights</p>	<p>Video Interview</p>	<p>Major gaps include obtaining accurate data on the LGBT population, providing shelter for nonbinary individuals (since existing shelters are gender-separated), providing mental health and other supportive services, and providing duplicate resources (shelter in particular) if individuals are excluded from existing gender-binary facilities, either because of nonbinary identity or an individual ban. LGBT populations should be prioritized for HOME-ARP funding (including providing mental health and substance abuse services for the significant needs in this population), in addition to disabled individuals who may have difficulty accessing services. Rental assistance is a particularly important funding area to keep people housed, in addition to providing non-congregate additional shelter facilities and incorporating supportive services more robustly into shelter facilities.</p>
<p>Champaign-Urbana Tenant Union</p>	<p>Organization Addressing Fair Housing, Civil Rights</p>	<p>Phone Interview</p>	<p>Lack of sufficient funding for services is a major gap, in addition to bureaucratic procedures that make it hard for prospective applicants to receive services or categorically</p>

			exclude particular groups. Disabled individuals, families with children, and the lowest-income households are some of the most vulnerable community members who should be prioritized for HOME-ARP funding. Rental assistance should be a programming priority, in addition to providing shelter options for women and families with children.
Immigrant Services of Champaign-Urbana (ISCU)	Organization Addressing Civil Rights	Survey	Major gaps include COVID-era rental assistance funds phasing out, rising housing costs and lack of affordable housing, and a lack of recognition of the needs of immigrants. Immigrant communities are among the poorest in the Consortium service area and should be prioritized for HOME-ARP funds. All four program priorities have the potential to benefit immigrant populations; priority should be put toward accessible rental assistance, affordable housing, and non-congregate shelter.

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Summarize feedback received and results of upfront consultation with these entities:

Gaps

After being asked to describe the work that their organization does with HOME-ARP qualified populations, consultees were asked the following question –

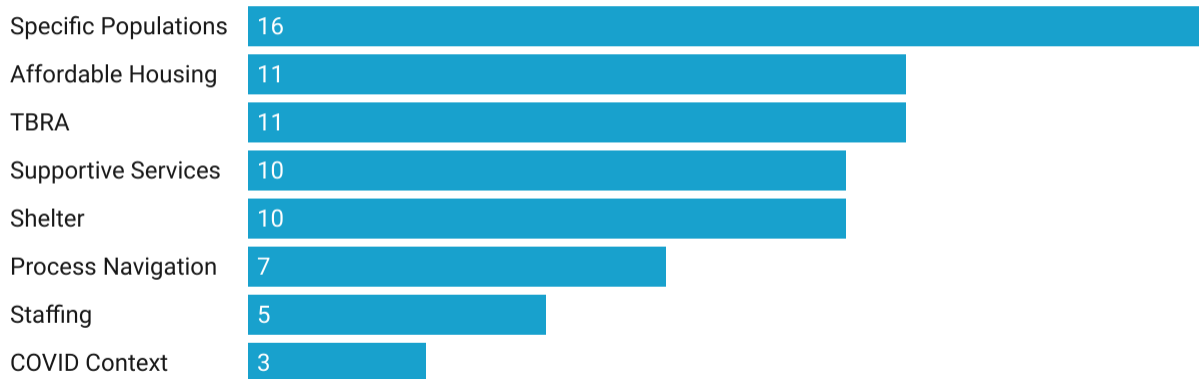
What gaps or outstanding needs do you see in your organization’s assistance to these qualified populations? (These gaps and needs can be specific to housing, or apply to general supportive services)

a. What gaps or outstanding needs do you see in the overall local approach to addressing the needs of qualified populations?

As seen from the graph below, many of the responses to this question (the second through fifth most common themes) were thematically in line with the four HOME-ARP eligible activities, which were asked about in more detail later in this section.

Themes in Service Gaps (Internal and External)

Number of responses addressing theme



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FIGURE 1 – THEMES IN SERVICE GAPS, FROM CONSULTATIONS

In addition, the most common theme related to the needs of a specific population, which was often elaborated upon in the next interview question about HOME-ARP priority populations. Populations mentioned in this question include –

- Sex Offenders (mentioned three times)
- Immigrants (mentioned twice)
- High Medical Need Homeless (mentioned twice)
- Disabled Head of Household (mentioned twice)
- Women and Children (mentioned twice)

- Rural/Outlying Population
- At-Risk of Homelessness
- Work Requirement Excluded
- VASH Exiting
- LGBT
- Chronically Homeless
- Formerly Incarcerated

Additional gaps that were commonly discussed included difficulties in navigating existing processes, lack of staffing capacity and the subsequent effect on work that organizations are able to perform, and adjusting to the particular circumstances of COVID (including increased needs for service, and adjusting to the current draw-down in COVID-related funding).

Priority Populations

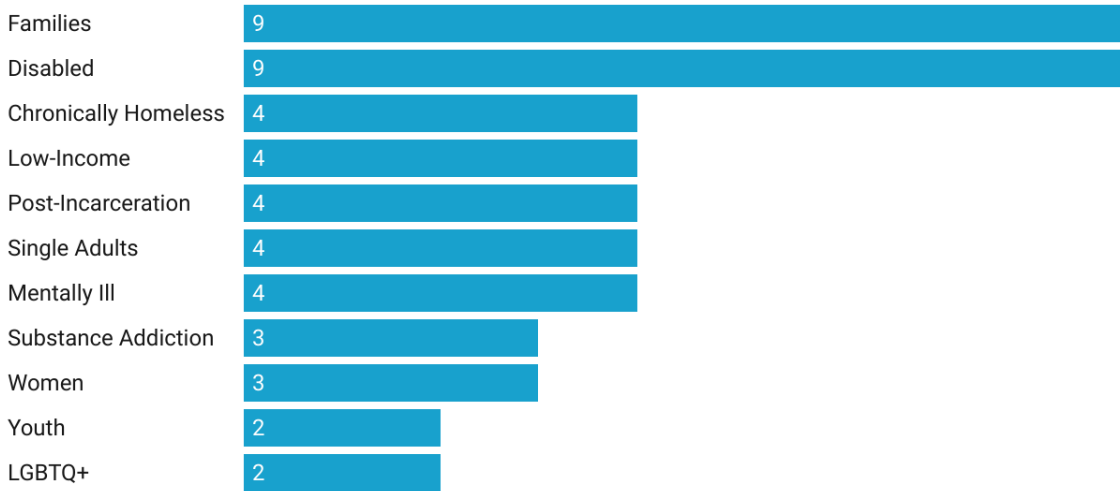
In order to understand population group priorities, consultees were asked the following question

Are there particular populations (demographics, groups, communities) that you believe should be prioritized for HOME-ARP spending? This could be because of particular difficulties in getting services to these groups, their more substantial needs, or other reasons for increased priority.

Categories that received one or more mentions as a priority population are seen in the graph below.

Priority Populations

Number of mentions in consultation



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FIGURE 2 – PRIORITY POPULATIONS, FROM CONSULTATIONS

This shows that families and the disabled were the most frequently mentioned priority population (each with 9 responses), followed by the chronically homeless, low-income, post-incarceration, single adults, and those with mental illness (with four responses each).

While many of these categories may overlap, effort was made in sorting the responses not to overgeneralize, and to categorize responses in the way that the consultees described them.

Categories that received single responses included

- Disinvested neighborhoods/geographic areas
- Immigrants
- “The literally homeless”
- Rural homeless
- Medically fragile
- At-risk/those not meeting the strict definition of homeless

Priority Programming

Consultees were also presented with the following question –

If the HOME Consortium hopes to focus their investment in a single program or very small number of programs, which of the four categories of HOME-ARP

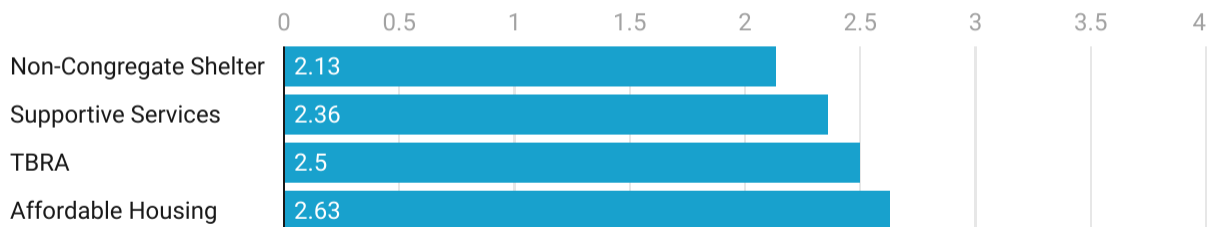
spending (defined below), would be most effective at addressing local needs? Are there any that you feel would be ineffective?

Interviewees spoke about any preferences that they had within the four spending categories, while online survey respondents were presented with a ranked-choice question, as well as the opportunity to elaborate on their rankings below if they wished. In order to quantify and compare the priorities, staff used interview notes to synthesize the interview responses to this question into numerical rankings. In some cases, interviewees explicitly ranked their priorities—one through four—in the interview, making this process simple. Other interviews did not allow for this precise level of sorting but expressed some preferences (for example, their top two priorities, or their top priority and lowest priority) and rankings were assigned to the relevant categories. In rare cases, interviewees did not provide any indication of priority between the four categories or expressed that all were equally important, in which case no rankings were assigned to their programming responses.

The graph below shows the average ranking of each of the four eligible activities, based on staff-assigned verbal scores and respondent-assigned survey scores. Using these rankings, non-congregate shelter was the highest priority, on average, followed by supportive services, TBRA, and affordable housing. However, the range of average scores is 0.5 points, indicating that there was broad support for all four categories.

Average Ranking of HOME-ARP Eligible Activities

Based on score of 1 (highest priority) to 4 (lowest priority)



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FIGURE 3 – RANKING OF HOME-ARP ELIGIBLE ACTIVITIES, FROM CONSULTATIONS

Public Participation

*In accordance with Section V.B of the Notice (page 13), 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.*

PJs are required to make the following information available to the public:

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

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Template:

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:

- ***Date(s) of public notice:*** Click or tap to enter a date.
- ***Public comment period:*** start date – **4/28/2022** end date - **5/31/2022**
- ***Date(s) of public hearing:*** Click or tap to enter a date.

Describe the public participation process:

For the initial public engagement—before the drafting of the allocation plan—the consultant created an online SurveyMonkey survey for the general public (separate from the previous online survey for service providers). This survey was distributed to the continuum of care mailing list with a request to distribute to their contacts, in addition to being sent to non-consortium community groups, nonprofits, and posted on social media by local governments. The survey was open from April 28 to May 31, 2022, and received 128 responses. Voluntary demographic information was collected from the survey, as well as questions about how to spend HOME-ARP funding.

In addition to the survey, the consultant presented the progress of the HOME-ARP allocation plan in public meetings to the following entities on the dates listed below –

- Continuum of Service Providers to the Homeless - March 1, April 5, and May 3, 2022
- City of Urbana Community Development Commission - April 26, 2022
- City of Urbana City Council – June 13, 2022
- City of Champaign City Council – June 14, 2022
- Champaign County Regional Planning Commission Community Action Board – June 23, 2022

Most of these presentations concluded with general questions about the HOME-ARP program and allocation planning process except for the Champaign City Council, who provided more direct feedback on HOME-ARP priorities. Champaign Council members expressed the importance of all four spending categories; however, due to existing programming (including recent investment in low-barrier shelter operations) and the needs that they saw, Council members were consistent in placing supportive services as the highest priority for HOME-ARP spending, followed by affordable housing.

The meeting with Champaign City Council also included two public comments about HOME-ARP funding. The first commenter discussed the creation of a landlord risk mitigation fund to address landlord concerns, the need to eliminate criminal record disclosure as a means of discriminating against renters, collaborating with the school district to identify families in need, serving a broader category of domestic violence victims past those meeting the strict definition of fleeing, improving rental property inspections, increasing transitional housing stock and moving more toward a housing first model, and utilizing the resources provided by the US Interagency Council on Homelessness. The second commenter emphasized the need to serve the literally homeless, the importance of quickly providing services rather than dragging out a process and causing people to lose hope, and the value of providing facilities to serve the homeless, addressing problems like mental health and lack of education, and providing individuals with relief so that they don't pursue crime and substance abuse as ways to cope with their situation.

Non-Survey Feedback

HOME Consortium staff and allocation planning consultant also received several emails during the public input process, not summarized in the survey response section below. One email was the record of a conversation with City of Champaign front desk staff, where the caller expressed “that they wished to see more funds being allocated to sheltering the homeless and would like to see more stable sources of shelter for these individuals.” One email expressed the sender’s negative experience and removal from the existing Shelter Plus Care program and expressed that funding should be focused on improving the staffing for organizations serving Qualified Populations so that they can more effectively serve clients. One email was from a community member inquiring about immediate rental assistance needs. This community member was

provided information on currently available resources. Finally, one email was from the owner of an existing motel in the area, expressing their interest in converting the motel into affordable housing facilities, with case management and other programming facilities included.

Describe efforts to broaden public participation:

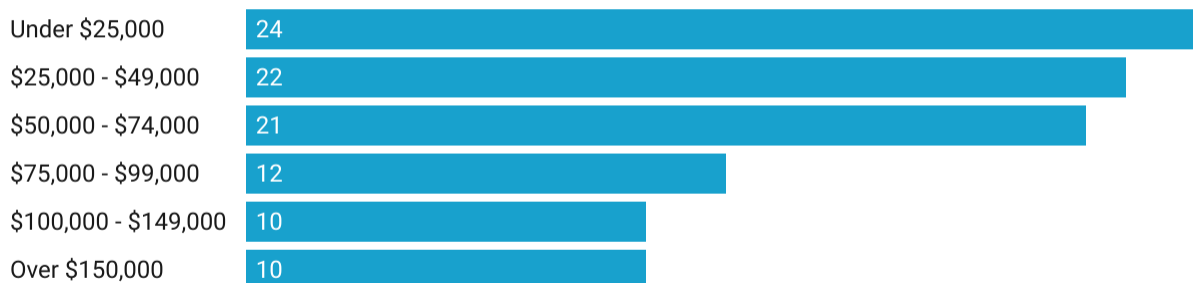
In addition to presenting at public meetings, the online survey allowed for an accessible and time-flexible opportunity for public comment. The survey link, information about HOME-ARP, and a request to share this content with an organization’s contacts were distributed to all Continuum of Care service providers, in addition to other non-consortium community groups, in an effort to reach the broadest swath of residents. The survey was translated into Spanish, and contact info to request further accommodations was included in the introduction to the survey. In addition, the online survey was converted into a pdf and sent to public agencies, for cases when manual survey completion was more feasible.

Success in engaging with a broad population, including often disenfranchised groups, was shown by the survey’s demographic questions, with two of the most salient variables discussed below.

Of the 99 survey respondents who provided household income information (77% of all respondents), the lowest income categories were most heavily represented, with nearly half of these respondents coming from households making under \$50,000 per year. This indicates a strong response rate from low-income households who could be the clients of HOME-ARP programming.

Annual Household Income of Survey Respondents

Number of respondents



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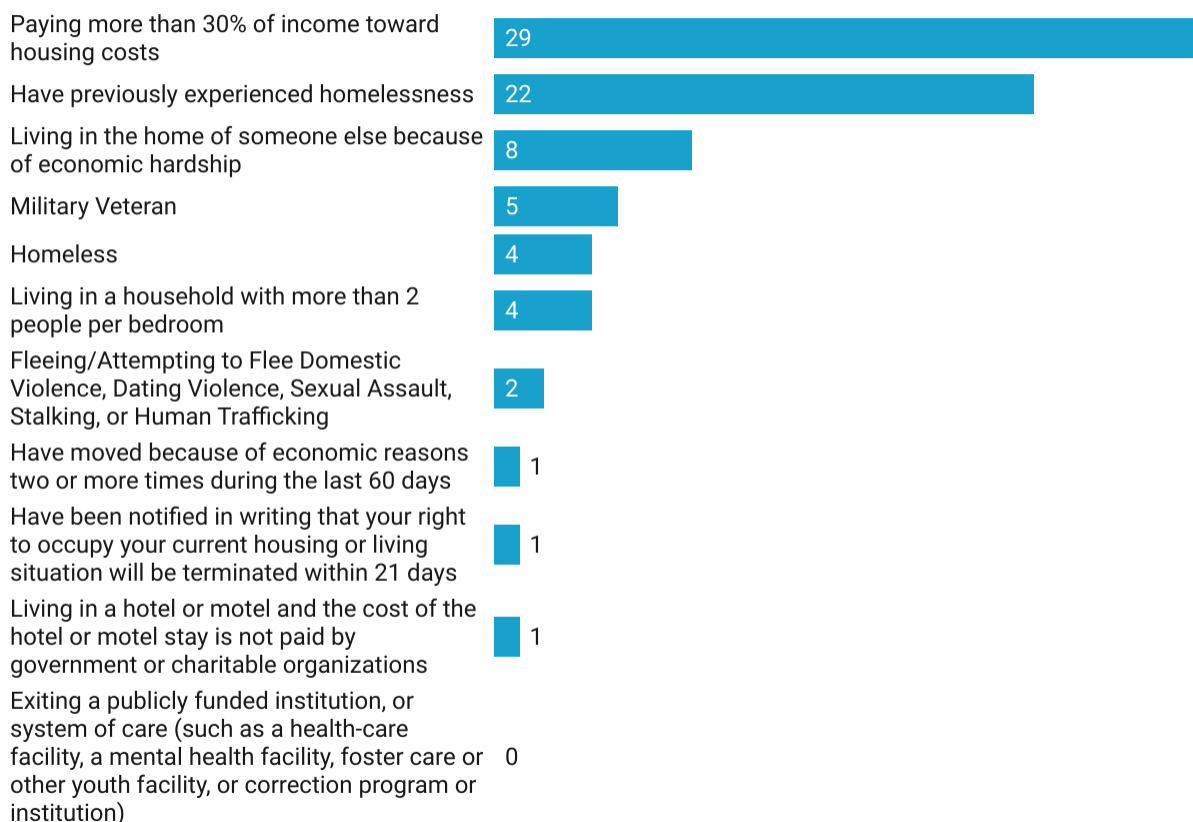
FIGURE 4 – ANNUAL HOUSEHOLD INCOME OF SURVEY RESPONDENTS

This is reinforced by another demographic question, which read “Please check the box for any of the HOME-ARP Qualifying populations that describe you or your household members,” with qualifying attribute language taken from official HOME-ARP documentation. Forty-seven respondents, or more than a third of all respondents, indicated that they met one of these categories. While many of these attributes don’t individually qualify a household for HOME-

ARP assistance, this question again indicates that the survey was successful in reaching housing-vulnerable populations who may be able to take advantage of eventual HOME-ARP services.

HOME-ARP Populations in Survey Responses

By number of respondents



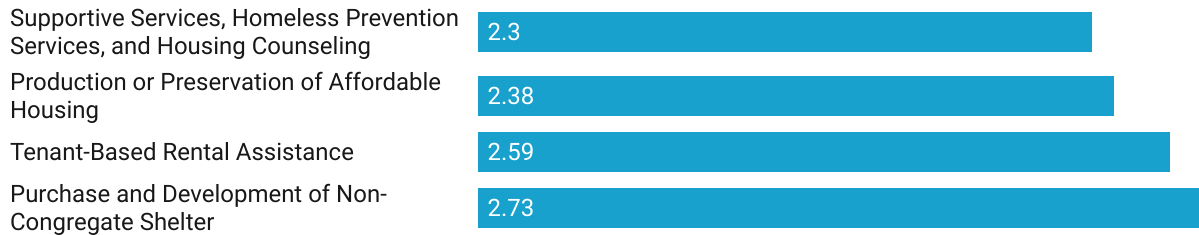
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FIGURE 5—HOME-ARP POPULATIONS IN SURVEY RESPONSES

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

Similar to the consultation ranking of HOME-ARP eligible programs, public survey respondents were asked to rank the four categories, with descriptions of each spending category included in the question. Like the stakeholder rankings, the average ranks for each category had a range of less than .5, indicating support for each program. However, the public ranked supportive services as their highest priority, followed by affordable housing, TBRA, and non-congregate shelter.

Public Ranking of HOME-ARP Eligible Programs



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FIGURE 6 – PUBLIC RANKING OF HOME-ARP ELIGIBLE PROGRAMS

When the HOME-ARP program ranking is filtered to just show the rankings of the 47 individuals who responded to “Please check the box for any of the HOME-ARP Qualifying populations that describe you or your household members,” the subsequent ranking is shown below. Focusing on this population of possible HOME-ARP beneficiaries, the highest priority activity was rental assistance, followed by supportive services, affordable housing, and non-congregate shelter.

Qualified Population Ranking of HOME-ARP Eligible Programs



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FIGURE 7 – QUALIFIED POPULATION RANKING OF HOME-ARP ELIGIBLE PROGRAMS

Survey respondents were provided the following question to elaborate on their thoughts about the four priority areas:

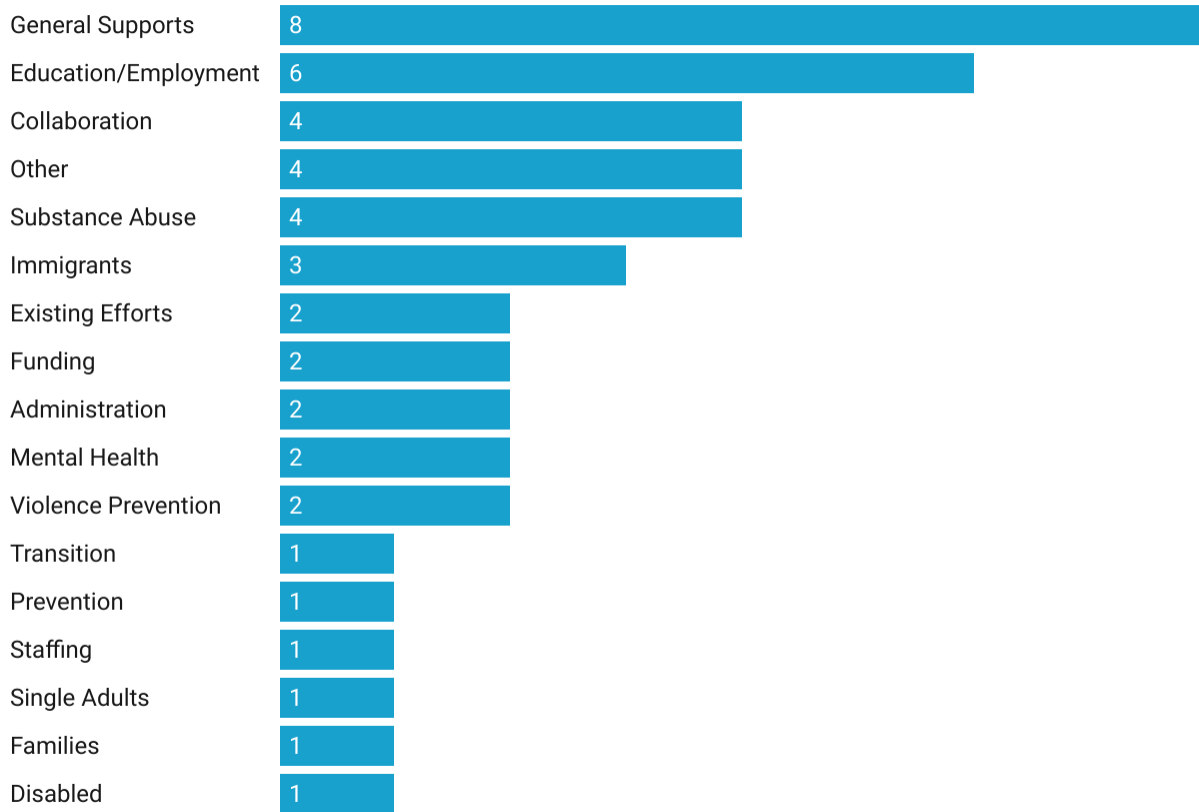
Do you have specific ideas for funding projects and programs related to any of the priority areas? If so, please enter them below in the text box associated with the relevant priority area.

The following section will discuss the responses for each priority area, with the responses sorted by major themes and representative quotes illustrating the responses received.

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Supportive Services, Homeless Prevention Services, and Housing Counseling

Supportive Services Suggestions, by Theme



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FIGURE 8 – SUPPORTIVE SERVICES SUGGESTIONS FROM SURVEY, BY THEME

The most common suggestions for supportive services involved general counseling and support -

- “Need more homeless rehabilitation to help them stay stable”
- “Increased case management and access to supportive services.”

This was followed by suggestions for assistance in educating clients or assisting them in securing employment –

- “have counselors that can give information, job recruiters”
- “Definitely a need for counseling services including money mgmt..”

Another recurring theme was increasing collaboration –

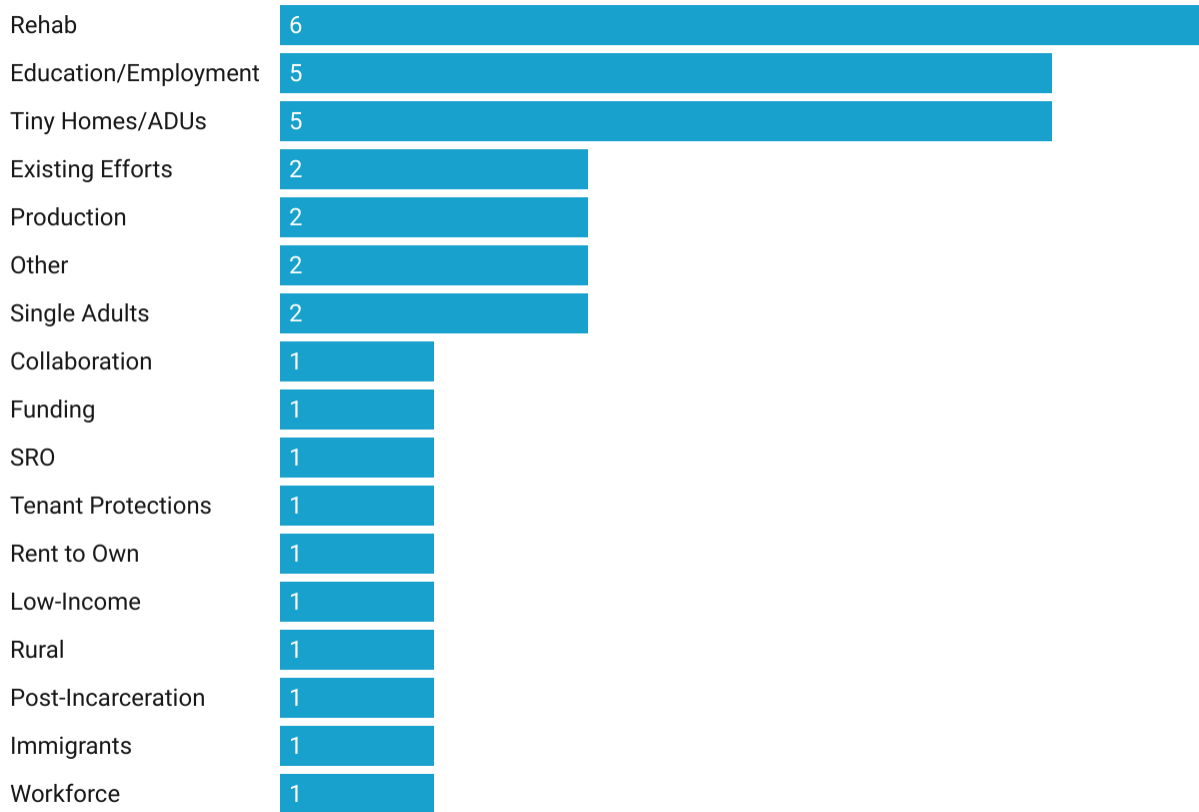
- “Additional housing navigation specialists added into any of the following: HACC, RPC, or another entity that is accessible by any community member”
- “This could be a joint effort with other social services so people are receiving streamlined services”

Finally, many respondents emphasized the need for services for specific populations, including those with substance abuse or mental health struggles, immigrants, single adults, families, and the disabled.

DRAFT

Production or Preservation of Affordable Housing

Affordable Housing Suggestions, by Theme



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FIGURE 9 – AFFORDABLE HOUSING SUGGESTIONS FROM SURVEY, BY THEME

The most common suggestion for affordable housing projects was renovating or rehabilitating existing housing in the community –

- “It could be a good model to purchase and rehab not only buildings but also trailers”
- “Convert hotels/motels into efficiencies”
- “Converting old fraternity/sorority houses or pre-existing hotels to room rental places for the community.”

Respondents also emphasized the integration of education and employment into affordable housing provision –

- “Programs for community members needing guidance and help with first time home ownership”
- “Volunteer labor or pay able homeless for labor”

- “many of those persons that are part of the vulnerable populations such as immigrants and other at-risk minorities can be employed in rehabbing and at the same time learning from professionals carpentry and other skills in rehabbing a dwelling where they may then live with their family”

Several respondents mentioned the possibility of small-scale housing (including ADUs and tiny homes) to provide shelter –

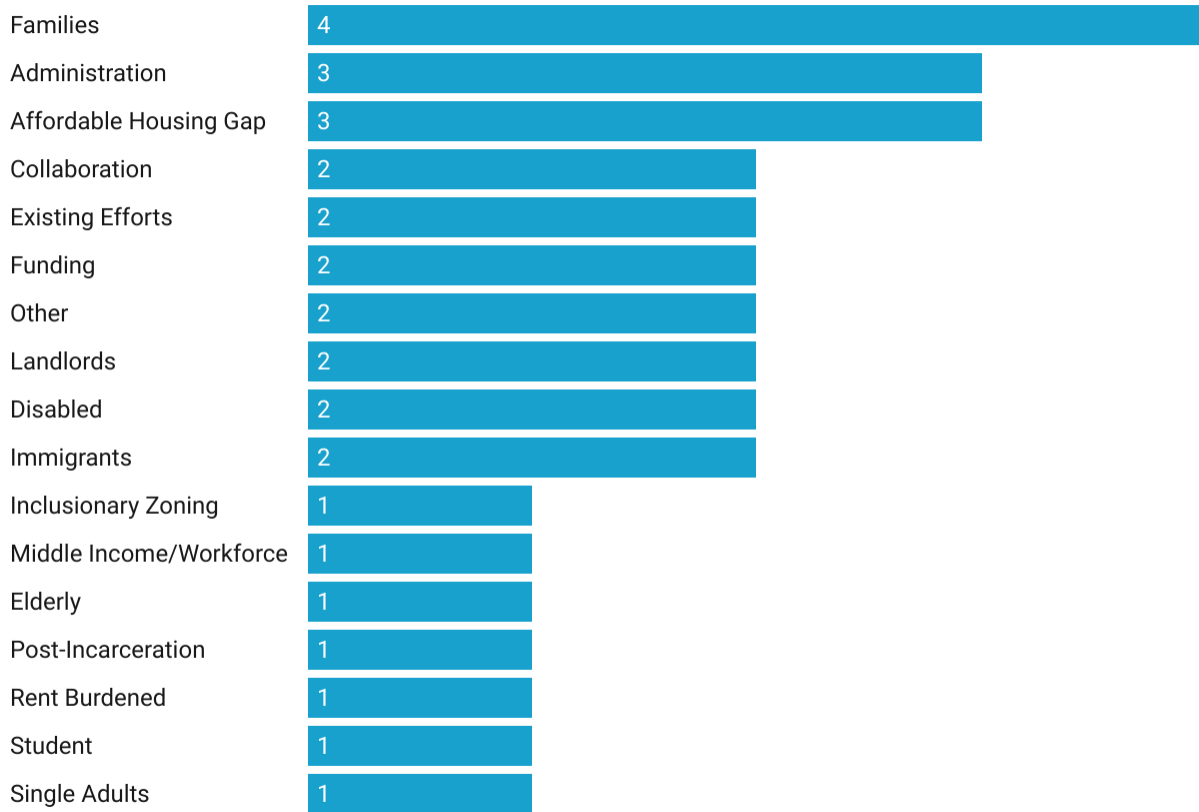
- “Mini houses would provide many single homeless individuals with a place to call home”
- “Several cities across the country have constructed small houses for people who are homeless and made them available rent-free”
- “Support the ADU measure in Champaign”

Respondents again mentioned several population groups that service should be prioritized for, including single adults, low-income and rural households, individuals leaving incarceration, immigrants, and the workforce.

DRAFT

Tenant-Based Rental Assistance

TBRA Suggestions, by Theme



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FIGURE 10 – TBRA FROM SURVEY, BY THEME

The most common suggestion for Tenant-Based Rental Assistance was to give priority to families –

- “prioritize families with children and then the disabled, 12 month subsidies”
- “3-6 months of assistance for parents that have no paid maternal leave”

Respondents also provided feedback on how assistance should be administered –

- “Ongoing programs based on an application and limitations on number of times assisted per year so as to allow multiple households to benefit”
- “Graduated assistance program that tapers assistance”
- “Establish rent cap percentages/thresholds”

TBRA’s role in addressing the local affordable housing gap was also expressed –

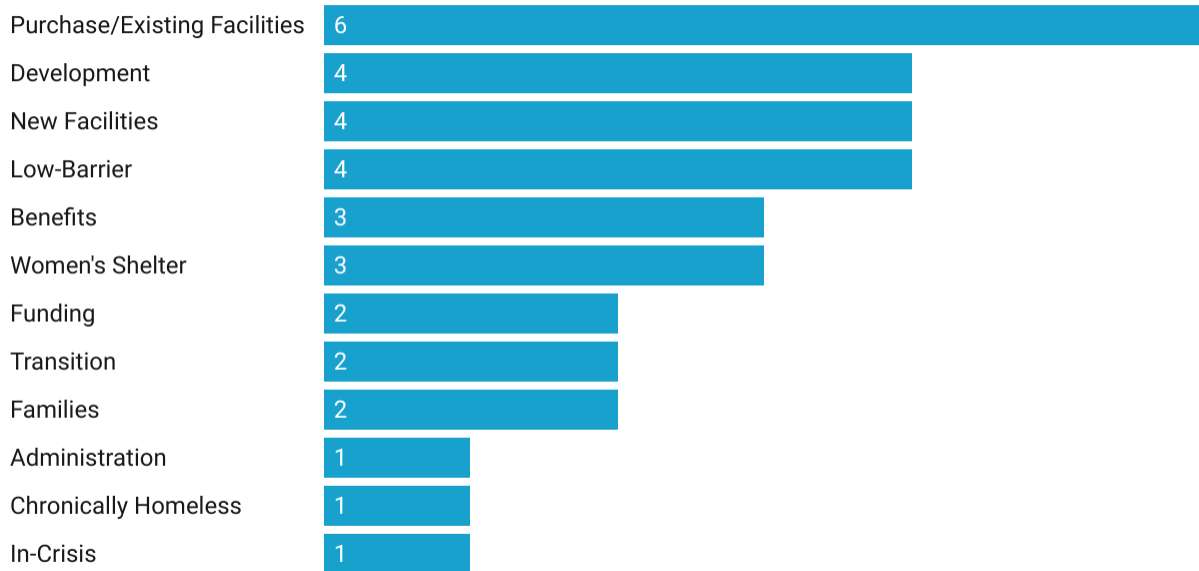
- “Tenant based rental assistance is needed due to the high cost of move in”
- “Rent is too high in this area and it's hard for people to find affordable rentals”

Major populations to focus TBRA funding toward included the disabled, immigrants, the workforce, the elderly, those exiting incarceration, students, and single adults.

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Purchase and Development of Non-Congregate Shelter

Non-Congregate Shelter Suggestions, by Theme



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FIGURE 11 – NON-CONGREGATE SHELTER SUGGESTIONS FROM SURVEY, BY THEME

The most common suggestion for non-congregate shelter was to purchase existing facilities for its use –

- “There are many historic fraternity/sorority homes no longer in use that would make excellent candidates”
- “Vacant/available motels in north Urbana that could be purchased and rehabbed”
- “Convert old nursing homes, hotels etc into temporary housing for families”

Other respondents encouraged the development and construction of these facilities –

- “Develop a trailer park for permanent or semi-permanent housing”
- “Tiny house village”

Others simply expressed the need for additional shelter facilities –

- “More and Better shelters”
- “The cities or the county should own 12-24 units of good-quality rooms and apartments for individuals and families who are facing a crisis”

A particular shelter need was additional low-barrier facilities –

- “Make sure in winter that even those with active addiction are housed overnight”
- “A low barrier shelter”

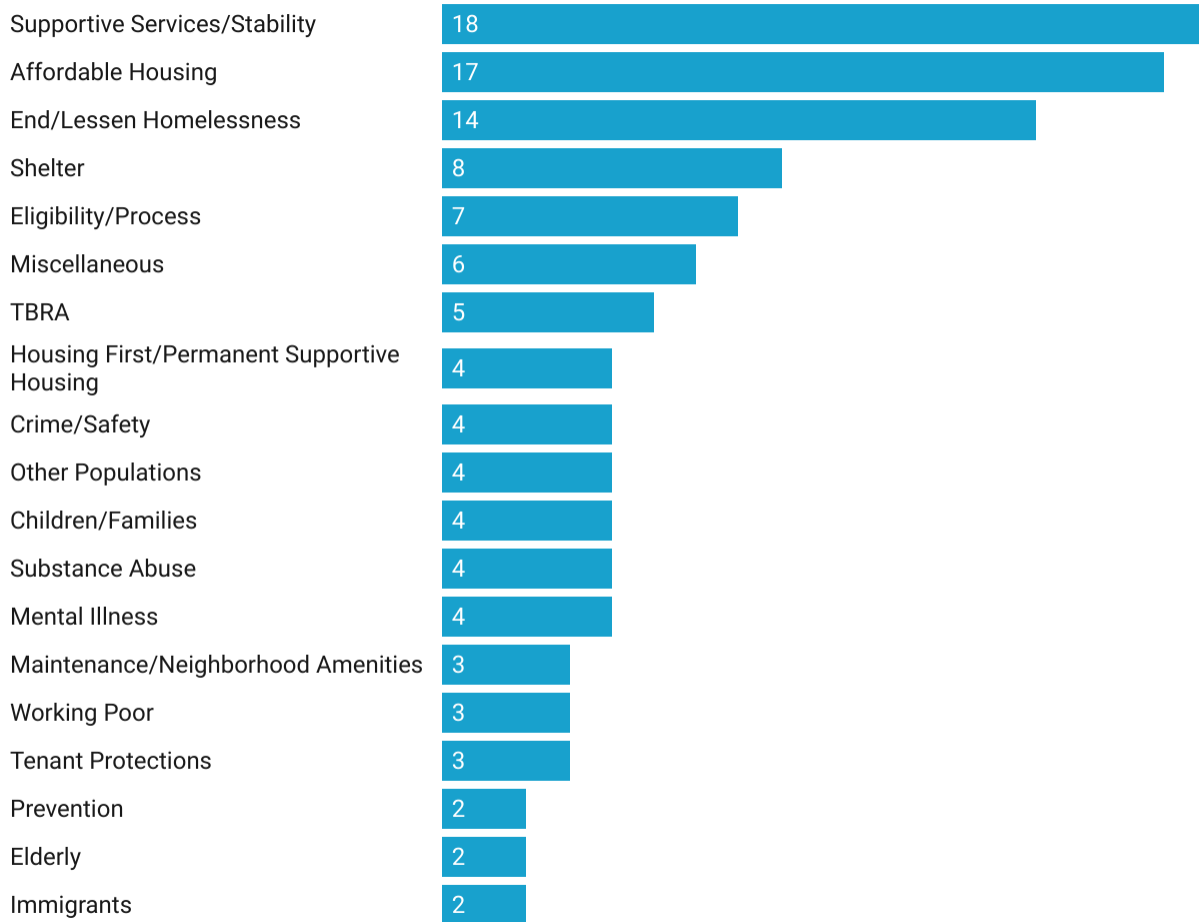
Particular populations that should be served by a low-barrier shelter included women and families, as well as both the chronically homeless and those in a temporary crisis.

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Respondents were provided the following question on goals for HOME-ARP spending.

What specific goal(s) or outcome(s) would you like to see achieved with this money?

Themes in Public Goals for HOME-ARP Funds



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FIGURE 12 – GOALS FOR HOME-ARP FUNDS FROM SURVEY, BY THEME

When discussing goals for the HOME-ARP funds, the most commonly addressed theme was long-term stability and the role that supportive services play in this –

- “Focus on support services and assistance to families to keep them in stable housing”
- “People not just getting financial assistance, but acquiring knowledge and behavior changes to make their life more stable”

The next most common was addressing local housing affordability issues –

- “More options for low income people that need housing.”

- “Increased access to safe housing for children and families.”

The third most common were explicit calls to end or lessen homelessness in Champaign County

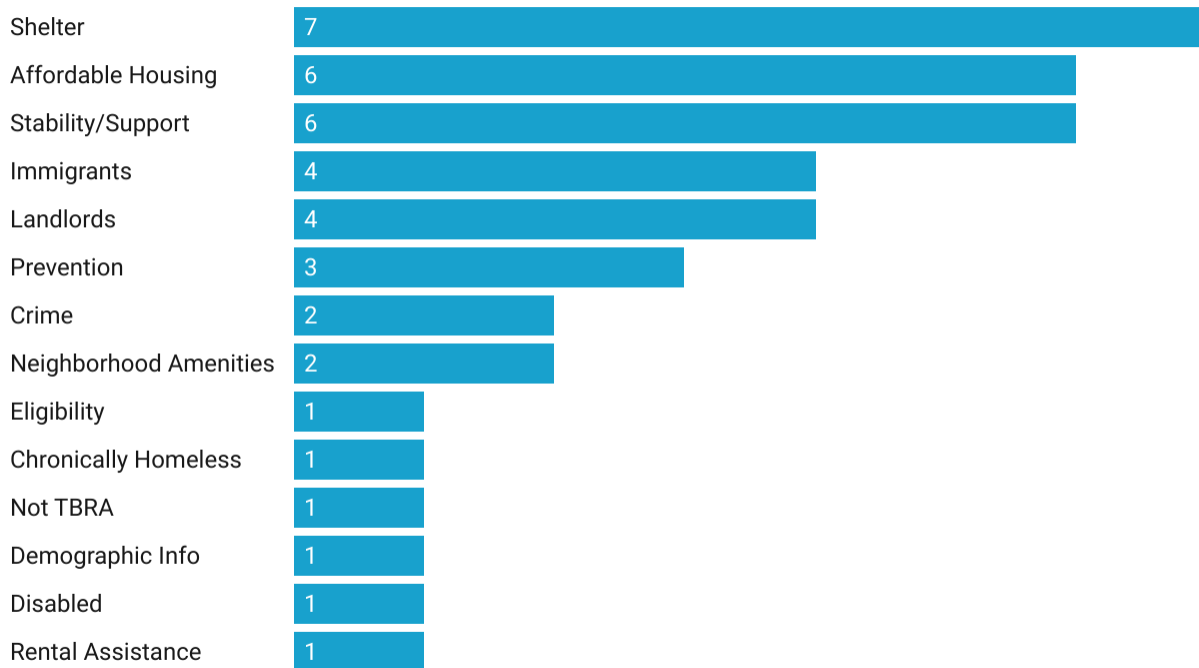
- “I would like to not see anyone sleeping outside. There needs to be enough shelter spaces to accommodate individuals, families and people with mental health and/or substance abuse issues. Once people are housed they need access to supportive services.”

The graph above shows the remaining themes including providing more short-term shelter options, expanding eligibility for services or streamlining processing, and addressing the needs of specific populations (those with mental health or substance abuse struggles, children and families, the working poor, the elderly, immigrants).

Finally, respondents were able to provide any additional comments that were not addressed in the previous questions:

Please provide any additional feedback on these funds and how they should be prioritized or approached by the Urbana HOME Consortium.

Themes in Additional Survey Comments



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FIGURE 13 – ADDITIONAL COMMENTS FROM SURVEY, BY THEME

When provided the opportunity to offer additional comments, the most common theme was the need for expanded shelter capacity –

- “I’ve seen in the last 2 -3 weeks that more emergency shelters are needed. The only one available is currently full leaving many on the streets in inclement weather; some [with] minor health problems that are made worse by sleeping outdoors.”
- “CU needs permanent accessible shelter for those most vulnerable, and funds to support staff year round for the same.”

Respondents also expressed the need to address the lack of local affordable housing –

- “More income-based housing should be added... Duplex houses for single families with kids and better shelters for the homeless”
- “Affordable housing and supportive services should be prioritized. Affordable SAFE housing is not always available. Shelters are helpful in the short term, but it is better to keep a person in a home instead of putting them on the street”

Others mentioned providing the support for clients to achieve long-term stability –

- “Programming should focus on addressing underlying issues contributing to housing problems, rather than applying "band-aid"”
- “Keep people from becoming homelessness, get people off the streets, keep people off the streets”

Population groups of interest included collaborating with private landlords, as well as providing services to immigrants, the chronically homeless, and the disabled, as well as a general focus on serving the demographic groups most in need.

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

All comments that were able to be sorted were accepted and factored into the data featured above. The four comments below were responses to the Additional Feedback question and were placed in a “Miscellaneous” category because they either expressed general support or opposition to the entire HOME-ARP project or because the commenter’s intent was unclear.

- “All four are valuable!”
- “These are all great uses.”
- “Send them back to federal government. Obviously this late in the game you don’t need the money. Give it Back to the taxpayers”
- “Slow and easy”

Needs Assessment and Gaps Analysis

*In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. 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.*

DRAFT

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	45	17	81	5	0								
Transitional Housing	21	11	35	35	0								
Permanent Supportive Housing	27	12	42	42	31								
Other Permanent Housing	0	0	4	4	2								
Sheltered Homeless						57	80	3	17				
Unsheltered Homeless						0	2	0	0				
Current Gap										-36	#	-82	#

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

UNITS ARE EXCLUSIVE AND POPULATION IS NON-EXCLUSIVE (I.E. VETERAN BEDS ARE NOT PART OF OTHER BED COUNTS, BUT VETERAN INDIVIDUALS ARE COUNTED WITHIN OTHER POPULATION COUNTS.

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	34,609		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1983		
Rental Units Affordable to HH at 50% AMI (Other Populations)	10,784		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		9,583	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,624	
Current Gaps			7600 ELI At-Risk Units 0 (-9160) Other Units

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

While these tables provide a useful introduction to the status of qualified populations and facilities serving them, they overlook features like a mismatch between the demographics a facility can serve and the actual individuals seeking service, differences in facility supply and service demand over time, and the value of redundancy in service provision (for example, if an individual is forbidden from a particular facility or has had a negative experience discouraging them from seeking help there). These will be discussed later in the unmet service need and gaps sections.

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

Homeless as defined in 24 CFR 91.5

One hundred thirty-seven individuals were counted in the 2022 Point in Time count, of whom, 111 were in emergency shelters, 24 were in transitional housing, and two were unsheltered.

Within this homeless population, 76 individuals (55.5%) were Black or African American, followed by 54 (39.4%) white, six (4.4%) of multiple races, and 1 (0.7%) American Indian or Alaska Native. Eleven of these individuals (8.0%) identified as Hispanic/Latino. 84 (61.3%) of the homeless individuals counted were male, and 53 (38.7%) were female.

Sixteen chronically homeless individuals (11.7%) were part of this count, all of whom were living in emergency shelter.

Thirty-four (24.8%) of the individuals counted were children under the age of 18, 24 (17.5%) were between the ages of 18 and 24, and 79 (57.7%) were over the age of 24. Of the youth population (here meaning 24 or younger, 15 were unaccompanied. All of these unaccompanied youth were legal adults (18 or older) and were either in emergency or transitional shelter. One of these unaccompanied youths was chronically homeless.

Fifty-seven individuals (41.6%) were in households with both adults and children, including all 34 children in the count, nine 18-24-year-olds, and 14 other adult parents. Six youth individuals in the 18 to 24 range had children of their own, with their children representing 7 of the under-18 cohort. These youth parents included five females and one male. The remaining 80 adults were in adult-only households. One of these households was a pair, while the other 78 individuals were in one-person households.

Three of the homeless individuals were veterans. All three were males living in emergency shelter. One veteran was chronically homeless.

Twenty counted individuals (14.6%) had a serious mental illness (18 living in emergency shelter, and two in transitional shelter). Fourteen individuals (10.2%) had a substance abuse disorder (all living in emergency shelter). Five individuals, or 3.6%, (all in emergency shelter) were adults with HIV/AIDS. Seventeen individuals (12.4%) were adult survivors of domestic violence; ten living in transitional shelter and seven in emergency shelter.

At-Risk of Homelessness as defined in 24 CFR 91.5

Using the shorthand for At-Risk from the table above (0%-30% AMI Renter households with 1 or more severe housing problems), HUD's Consolidated Plan and Continuum of Care Planning Tool states that there are 9,583 At-Risk households in the Urbana HOME Consortium's jurisdictional boundaries (based on the 2011-2015 Comprehensive Housing Affordability Strategy, or CHAS). In order to provide more detailed information on the demographic components of this population (and more recent data), the remainder of this section will not use the CHAS, but will instead use American Community Survey (ACS) microdata for all of Champaign County. This will allow for examining demographics within the At-Risk and Other Populations groups in a way that is not possible with the summary tables from the planning tool.

The Urbana HOME Consortium's jurisdiction represents the entirety of Champaign County, minus the village of Rantoul. This means that the HOME Consortium serves 93.8% of the county's population, according to 2016-2020 ACS data. When looking specifically at the At-Risk population, Rantoul's 2011-2015 CHAS data indicates that it had 570 At-Risk households, or 5.9% of the At-Risk households in Champaign County. This further supports the fact that while the county-wide data won't perfectly describe the Urbana HOME Consortium's service area, the vast majority of the people described are in HOME Consortium jurisdiction, so this data provides a useful estimate for the demographics of at-risk and housing unstable populations that the consortium serves.

According to 2016-2020 ACS microdata sources from IPUMS USA, Champaign County had 12,294 households at risk of homelessness (defined here as renter households below 30% of Area Median Income and having one or more of the following severe housing problems: lacking kitchen or complete plumbing, severe overcrowding, severe cost burden).

This At-Risk population is 44.4% white, 25.4% black, and 23.5% Asian or Pacific Islander, with all other groups making up less than 5% each. Hispanic/Latino individuals of any race make up 7.4% of this population. The average age of an individual living in an At-Risk household is 25.2, while the average age in the county is 35.3. 1.6% of individuals in this group do not speak English or don't speak it well. 81.3% of At-Risk individuals are American citizens (compared to 91.7% of county residents). After English—spoken at home in 64% of households—the most commonly spoken languages are Chinese (12.5%), Spanish (5.8%), and Hindi (5.1%).

The average household income for this group is \$5,989, compared to the average county income of \$75,131. 92.1% of individuals 25 or older have a high school diploma or equivalent. Of the adult population, 61.5% are not in the labor force, 32.2% are employed,

and 6.2% are unemployed. 1% of individuals in this category are veterans. 8.7% of individuals have some type of disability.

The average household size for this population is 1.7 people. The average gross rent (including utilities) for a household is \$925 per month. 1.7% of households lack a full kitchen, while 0.5% lack proper plumbing. 7.5% of households are severely overcrowded (more than 1.5 persons per room), and 99% of households in this category are severely cost-burdened (paying more than half of their income toward housing costs).

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

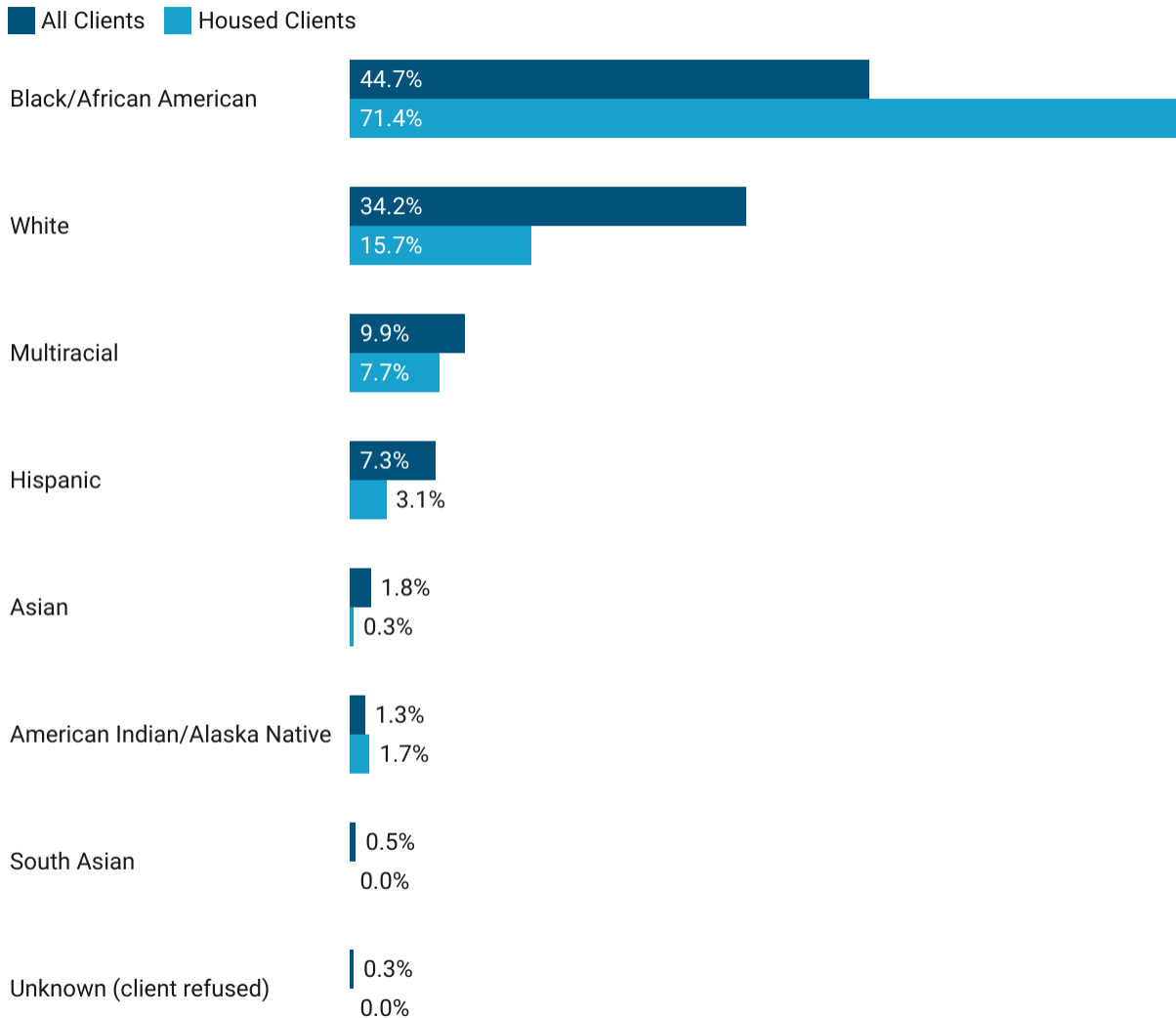
County-level domestic crime data from the Illinois Uniform Crime Reports indicate that in 2019 (the most recent year available), Champaign County was ranked fourth in the state for the rate of domestic violence (1525.6 annual incidents per 100,000 people). When looking at previous years' data, Champaign County was sixth for the 5-year average rate (1452.68 per 100,000), and fourth for the 10-year average rate (1532.17 per 100,000). These rankings indicate that the Urbana HOME Consortium jurisdiction (which represents 93.8% of Champaign County's population) is extremely likely to see substantially higher rates of domestic violence than Illinois at large.

Client data from Courage Connection, the primary domestic violence service provider in the area, provides further information on those fleeing domestic violence situations. All of the following data is taken from the Fiscal Year 2021 and includes data for all client services, as well as for residential programs (emergency shelter and transitional housing) specifically.

During this time, Courage Connection served 619 total clients; 472 adults and 147 children. 127 adults and 101 children were served through emergency shelter, and 28 adults and 31 children were served through transitional housing.

Eighty-four percent of total clients served were female, 15% were male, 0.5% were transgender, and 0.2% were genderqueer (for housing clients, the proportions were 79% female, 20% male, and 0.7% transgender). 45% of all clients were Black/African American, followed by 34% white, 10% multiracial, 7% Hispanic, and less than 2% for all other categories. Of clients receiving housing, 71% were Black/African American, 16% were white, 8% were multiracial, 3% were Hispanic, and the remaining categories were less than 2% of the client base.

Racial and Ethnic Makeup of Clients (percent)

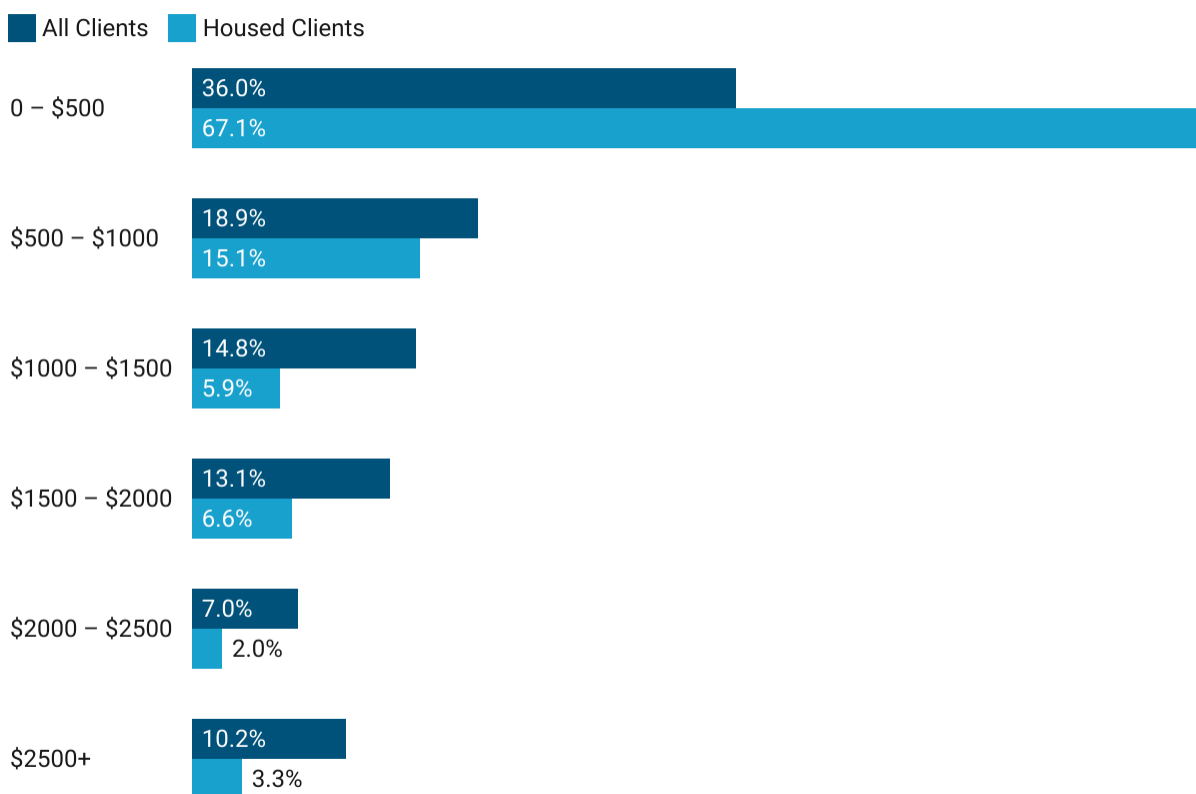


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FIGURE 14 – RACIAL AND ETHNIC MAKEUP OF COURAGE CONNECTION CLIENTS, FY2021

61% of households served included adults with children, while 39% were adult-only (housing clients had similar proportions, 65% with children and 35% adult-only). 6% of all clients and 1% of housing clients did not speak English as their primary language. Monthly income data can be seen in the graph below, with a third of all client households and two-thirds of housed client households making less than \$500 a month, and 55% of total and 82% of housed clients making less than \$1000.

Monthly Income of Client Households (percent)



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FIGURE 15 – MONTHLY INCOME OF COURAGE CONNECTION CLIENTS, FY2021

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

Based on a similar methodology to the one discussed in the At-Risk population section (altered only to focus on 30-50% of AMI, rather than <30%), the Urbana HOME Consortium had 1,624 Other Populations households (from here on referred to as Housing Unstable) according to 2011-2015 CHAS. The village of Rantoul had 100 Housing Unstable households in this data vintage, indicating that nearly 94% of Champaign County’s Housing Unstable households were in the Urbana HOME Consortium service area.

According to 2016-2020 ACS microdata sources from IPUMS USA, Champaign County had 2,000 Housing Unstable households (defined here as renter households between 30% and 50% of Area Median Income and having one or more of the following severe housing problems: lacking kitchen or complete plumbing, severe overcrowding, severe cost burden).

This population is 47.2% black, 28.3% white, 15.9% Asian or Pacific Islander, with all other groups making up less than 5% each. Hispanic/Latino individuals of any race make up 8.3%

of this population. The average age of an individual living in an At-Risk household is 27.0, while the average age in the county is 35.3. 7.3% of individuals in this group do not speak English well. 83.9% of Other Population individuals are American citizens (compared to 91.7% of county residents). After English—spoken at home in 63.7% of households—the most commonly spoken languages are Spanish (12.9%), Chinese (6.7%), and Sub-Saharan African languages (5.3%).

The average household income for this group is \$23,715, compared to the average county income of \$75,131. 96.2% of individuals 25 or older have a high school diploma or equivalent. Of the adult population, 56.0% are employed, 36.9% are not in the labor force, and 7.1% are unemployed. 1.4% of individuals in this category are veterans. 8.9% of individuals have some type of disability.

The average gross rent (including utilities) for a household in this category is \$1,152 per month. The average household size is 1.8 people. 3.0% of households lack a full kitchen, while none lack proper plumbing. 21.5% of households are severely overcrowded (more than 1.5 persons per room), and 83.8% of households in this category are severely cost-burdened (paying more than half of their income toward housing costs).

Champaign County has a consistently higher rental vacancy rate than the state or county at large, with an estimate of 10.8% in the 2016-2020 ACS survey and 8.0% in the 2011-2015 ACS survey, compared to 5.9% and 6.4% in Illinois and 5.8% and 6.4% nationwide.

According to data compiled by the Eviction Lab at Princeton University, in 2016 (the most recent year for which funding was available) Champaign County had an eviction filing rate of 2.53% (below the Illinois rate of 3.41%) and an eviction rate of 1.44% (below the US rate of 1.58%)

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:

HUD's [database of LIHTC](#) properties lists 1,645 low-income units created in Champaign County through LIHTC, with 1,589 units in the last 30 years and 563 units in the last 15 years. In 2021, the Housing Authority of Champaign County administered 2,232 vouchers, including 259 special purpose vouchers.

The 2022 Housing Inventory Count conducted by the Champaign County Continuum of Service Providers to the Homeless lists 292 year-round beds, including 130 emergency shelter beds, 56 transitional housing beds, 100 permanent supportive housing beds, and six rapid rehousing beds.

The City of Champaign Township (serving the City of Champaign), Cunningham Township (serving the City of Urbana), and Champaign County Regional Planning Commission all administer temporary assistance programs for individuals with immediate hardship in paying housing costs.

In addition to population-specific housing and shelter programs, many of which are included in the HIC counts, supportive services provided by consulted organizations included general case management, legal representation, mental health counseling, career counseling, housing transition assistance, and childcare for populations including institutionalized youth, those with HIV/AIDS, those with developmental/intellectual disabilities, veterans, victims of domestic violence, children, the formerly incarcerated, and LGBTQ individuals.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Affordable Housing

Consultees described the difficulty for clients in securing affordable and quality housing, noting, among other issues, the rising cost of living, competition of low-income renter households with student renters, high demand for existing income-restricted units, and poor quality of units affordable to low-income households (whether due to building maintenance, size, or location).

These difficulties in accessing affordable housing can lead to short-term crises that result in homelessness or make it difficult for those exiting homelessness to maintain stability.

Over the period that the low-barrier men's and women's shelters were open this winter (December 27, 2021, to April 15, 2022), 2,196 bed nights were provided to men, and 437 to women. Over that time, 1 woman and 23 men were denied a low-barrier bed due to the facility being at its maximum capacity that night. On average, 20 men and four women were served per night.

Tenant-Based Rental Assistance

From the consultees, the most commonly expressed unmet TBRA need was a shortage of landlords willing to participate in rental assistance programs. While increased voucher availability would assist low-income renters, increased vouchers during the pandemic faced significant issues with take-up. Finding ways to incentivize participation and effectively discourage source of income discrimination is a significant need.

Supportive Services

In general, integrating supportive services more comprehensively into the shelter inventory was identified as a substantial need. In particular, the need for increased mental health and substance addiction services for homeless individuals was echoed throughout the consultations. In addition, consultees expressed the need for ongoing caseworker engagement after clients leave emergency shelter, to ensure that they can maintain stability in their long-term housing.

Non-Congregate Shelter

As noted in the Consultation section, many service providers noted the lack of a low-barrier, 24/7 year-round emergency shelter for both men and women. Current emergency shelter operations at C-U at Home include many daytime hours when clients are sent out from the facility. The year-round services at this facility also require residents to be sober, while the low-barrier shelter in other facilities is not provided in warm-weather seasons. In addition, providers noted that one organization currently providing the bulk of emergency shelter services can lead to individuals who have been banned or had negative experiences simply not receiving service. Additional emergency shelter facilities would help alleviate this problem. As of spring of 2022, City of Champaign Township has developed a plan to offer low-barrier, shelter, starting fall of 2022, which will address much of this need. In addition to this increase in services, non-congregate shelter facilities, in particular, would allow for the safety and flexibility of private rooms, allowing for a variety of genders, household types (families, in addition to individuals), and current conditions to be served, while minimizing disruption or safety concerns for other residents that come with the congregate shelter format.

At-Risk of Homelessness as defined in 24 CFR 91.5

Affordable Housing

At 30% of the Area Median Income, affordable gross rent per month would be \$627. The average rent in Champaign County is \$936. There are 17,858 households in the county making 30% of AMI or less, while only 7,209 units are being rented at an affordable rent for this group. Among units with a gross rent of \$627 or below, nearly a third of these (32%) are more than 50 years old, suggesting the likelihood of maintenance and other issues due to age.

As described above, the rising cost of living, competition of low-income renter households with student renters, high demand for existing income-restricted units, and poor quality of units affordable to low-income households (whether due to building maintenance, size, or location) make it difficult for low-income households to attain and secure affordable housing and can contribute directly to issues like cost burden and overcrowding that put households at risk.

Tenant-Based Rental Assistance

As expressed above, the most discussed problem with rental assistance (applicable to all QPs) was the shortage of landlords willing to participate in rental assistance programs, while inadequate rental assistance availability was also a commonly-discussed problem.

Supportive Services

Greater awareness of rights and services—including tenant rights and guidance in applying for financial assistance—can help prevent low-income households from reaching homelessness. However, organizations often lack the staffing in resources for this proactive outreach and guidance.

Non-Congregate Shelter

Consultees mentioned a delay in the process of securing financial assistance for households in a crisis. Non-congregate and low-barrier shelter can provide an additional option to provide immediate assistance, especially for households larger than individuals.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Affordable Housing

As described in the previous section, the rising cost of living, competition of low-income renter households with student renters, high demand for existing income-restricted units, and poor quality of units affordable to low-income households (whether due to building maintenance, size, or location) make it difficult for low-income households to attain and secure affordable housing. These constraints can limit the options available to households fleeing domestic violence.

Tenant-Based Rental Assistance

As expressed above, the most discussed problem with rental assistance (applicable to all QPs) was the shortage of landlords willing to participate in rental assistance programs, while inadequate rental assistance availability was also a commonly-discussed problem.

Supportive Services

Similar to the needs of homeless individuals, those fleeing domestic violence often benefit from long-term casework including assistance in securing new housing, income, and mental health counseling. Interventions and assistance for all family members, including children, can have long-term impacts and prevent cycles of violence.

Non-Congregate Shelter

As noted in the homeless section, non-congregate shelter would allow for more flexibility in emergency shelter clientele. This can allow for parents and children fleeing domestic violence to access emergency shelter together, rather than being split between services and facilities. Similarly, this format could avoid the need to segregate emergency shelter by gender.

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

Affordable Housing

At 50% of the Area Median Income, affordable gross rent per month would be \$1045. The average rent in Champaign County is \$936. There are 25,586 households in the county making 50% of AMI or less and 27,227 units being rented at an affordable rent for this group. Among units with a gross rent of \$1045 or below, nearly a third of these (33%) are more than 50 years old, suggesting the likelihood of maintenance and other issues due to age.

The Housing Authority of Champaign County's combined waitlist for vouchers (both tenant-based and project-based) includes 5,431 applicants, as of June 2022. These applicant households represent 10,453 individual household members. Twenty-six percent of applicants are disabled or handicapped. Twelve percent of waitlist applicants are age 65 or older, while 15% are 25 or younger. Fifty-three percent of applicants were single-individual households. Forty-two percent of applicants had one or more dependent. Ninety percent of these dependent households only featured one non-dependent adult (representing 38% of all households). Seventy-eight percent of waitlist applicants are female and 22% are male.

As described above, the rising cost of living, competition of low-income renter households with student renters, high demand for existing income-restricted units, and poor quality of units affordable to low-income households (whether due to building maintenance, size, or location) make it difficult for low-income households to attain and secure affordable housing and can contribute directly to issues like cost burden and overcrowding that put households at risk.

Tenant-Based Rental Assistance

As expressed above, the most discussed problem with rental assistance (applicable to all QPs) was the shortage of landlords willing to participate in rental assistance programs, while inadequate rental assistance availability was also a commonly-discussed problem.

Supportive Services

Greater awareness of rights and services—including tenant rights and guidance in applying for financial assistance—can help low-income households from reaching homelessness. However, organizations often lack the staffing and resources for this proactive outreach and guidance.

In addition, the vulnerable population of those with developmental or intellectual disabilities often require long-term case management to maintain stability and independence, but staffing for this assistance is frequently difficult, as described with other supportive services as well.

Non-Congregate Shelter

The current gendered congregate emergency shelter set-up provides a problem for non-binary individuals that could be alleviated by private facilities.

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

Based on the gap analysis tables provided above, the most significant gap is in affordable housing for At-Risk households, for whom there is a 7,600-unit gap. The CHAS data used for this table indicates that there are only enough affordable units for 20.7% of this population. As previously mentioned, the other data from the needs assessment table does not show significant gaps, but looking at homeless populations and beds as a whole can overlook shortages in shelter that exist at a certain point in time or for certain population groups, leading to an overestimating of shelter capacity.

As discussed in the Consultation section, the following populations were mentioned specifically when discussing gaps in current service provision.

- Sex Offenders (mentioned three times)
- Immigrants (mentioned twice)
- High Medical Need Homeless (mentioned twice)
- Disabled Head of Household (mentioned twice)
- Women and Children (mentioned twice)
- Rural/Outlying Population
- At-Risk of Homelessness
- Work Requirement Excluded
- VASH Exiting
- LGBT
- Chronically Homeless
- Formerly Incarcerated

Offering greater assistance in navigating the service provision and application process was also identified by service providers as a major gap. Hiring and retaining the staffing to provide all the direct services that are needed, as well as pursuing funding and ensuring compliance, was also a gap many organizations felt acutely.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ 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 populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

N/A

Identify priority needs for qualifying populations:

Homeless

Providing shelter facilities that are low-barrier, 24/7, and open to a variety of household structures and identities is the greatest need, to ensure that no one is required to spend a night on the street and that households can remain together. In addition, providing supportive services to build and maintain stability, from emergency shelter to permanent housing, is a priority for homeless individuals.

At-Risk of Homelessness

For those at-risk of homelessness, supportive services are the highest priority, to address the vulnerabilities that the household has and prevent them from sliding into homelessness. In addition, affordable housing is important to address affordability issues that place the household at risk, as is an emergency shelter that provides safe housing if their condition does change from at-risk to homeless.

Victims of Domestic Violence

Emergency shelter facilities that provide safe shelter to a whole household fleeing domestic violence (whether an individual or an adult with multiple children), as well as ongoing counseling and supportive services are priority needs for those fleeing domestic violence.

Other Populations

Providing increased affordable housing opportunities for low-income households is the priority need for this group, in addition to services to help them locate these opportunities.

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

To identify gaps and needs, this plan analyzed quantitative data from the state and federal government (eg. Comprehensive Housing Affordability Strategy, American Community Survey), along with data gathered from local service providers and institutions (Point in Time Count, Housing Inventory Count, annual organizational reporting). While this data presented a helpful picture, it was also supplemented by qualitative interviews and surveys from local experts and service providers, as well as the general public. These data sources provided an on-the-ground view of local needs and helped to fill in gaps in the quantitative data. Taken together, these various data sources provided a holistic view into the local qualified populations and their particular needs.

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HOME-ARP Activities

Template:

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

The City of Urbana, the lead agency of the Urbana HOME Consortium, will administer a request for proposal (RFP) process once the HOME-ARP Allocation Plan is approved by HUD. This RFP process will be administered using platforms already in use by the city and will allow applicants to state their requested funding amount, indicate which HOME-ARP activity (or list of activities) the funds will be used for, and state how their proposal will meet the needs articulated in this plan.

Describe whether the PJ will administer eligible activities directly:

The Urbana HOME Consortium will not administer any eligible activities directly. Individual agencies composing the consortium (the City of Champaign, the City of Urbana, Champaign County Regional Planning Commission) will be eligible to respond to the request for proposals, but staff from these organizations will not be involved in the selection process for any proposals for which they are involved or in competition.

If any portion of the PJ'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 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:

On March 3rd, 2022, the City of Urbana entered into an agreement with Champaign County Regional Planning Commission (CCRPC) for CCRPC to create the HOME-ARP Allocation Plan, for an amount not to exceed \$50,000. While the funding for this agreement will come from the HOME-ARP Administration funds, the scope of this contract is not for full HOME-ARP program administration, but simply the creation of this Allocation Plan document.

In accordance with Section V.C.2. of the Notice (page 4), 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.

Template:

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,000,000		
Acquisition and Development of Non-Congregate Shelters	\$ 400,000		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 1,000,000		
Non-Profit Operating	\$ 148,359	5 %	5%
Non-Profit Capacity Building	\$ 148,539	5 %	5%
Administration and Planning	\$ 273,875	9 %	15%
Total HOME ARP Allocation	\$ 2,970,773		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The Urbana HOME Consortium will allocate its HOME-ARP funds to three of the eligible activity areas—\$1 million each to Supportive Services and Affordable Rental Housing, and \$400,00 toward Non-Congregate Shelter. The remaining funds will go toward the administrating and planning of the HOME-ARP funds, as well as providing the infrastructure for recipient organizations to administer services, including through capacity building, staffing, and other expenses for effectively delivering the funded services. This funding allocation will allow the Consortium to address underlying issues in the local context (including the affordable housing supply, and the underlying struggles that qualified populations are coping with and contribute to instability). Investments in case management and other supportive services will allow the funding to serve the distinct needs of the many vulnerable populations in our community (as described in the consultation process), as will non-congregate shelter, as it provides the flexibility of safe shelter for a variety of household compositions and identities that is difficult in congregate shelter.

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:

The extensive network of local service providers—coupled with the staffing, capacity, and other funding limitations that these providers face—encouraged the investment in supportive services,

providing ways to build upon existing infrastructure and offer a greater depth and breadth of services to community members in need of this support to regain stability. Similarly, the large gap in housing affordable for qualified populations, coupled with issues in existing private housing (including affordability, quality, and willingness to rent to qualified populations) led to significant investment in creating affordable housing units that would serve these populations.

Throughout the HOME-ARP allocation planning process, other efforts by local governments included City of Champaign Township undertaking responsibility for administering a low-barrier emergency shelter in the community, with funding assistance from the City of Champaign, starting in November of 2022. This development addresses some of the urgent low-barrier shelter needs mentioned in the consultation process. However, it does not minimize the unique benefits that non-congregate shelter would provide when compared to congregate shelter. For that reason, the Consortium is allocating funds toward the development of non-congregate shelter. These funds, along with other HOME-ARP funds, provide a foundational investment that can be supplemented with other complementary funding, including annual HOME allocations, partnerships with local governments, and future grant opportunities.

Previously-mentioned struggles to place tenant-based rental assistance recipients, including a need to send back pandemic-era TBRA funds due to placement difficulties, discouraged the Urbana HOME Consortium from allocating funds to this activity. Instead, the consortium elected to focus on the supply side of the local housing shortage (through investments in affordable housing and non-congregate shelter), as well as providing non-housing assistance to address other underlying issues for qualified populations. In addition, supportive funds can be used for many of the programming ideas respondents provided for TBRA (including moving assistance and rental assistance for up to two years), as well as funding landlord outreach and other initiatives that could improve the efficacy of existing TBRA programs.

HOME-ARP Production Housing Goals

Template

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

Using the \$1 million it has allocated toward Affordable Rental Housing, the Urbana HOME Consortium will produce 4 new affordable housing units at \$250,000 each. This is in line with [HUD guidance](#) on maximum HOME per-unit costs, where a 2-bedroom elevator unit can cost up to \$250,530. In addition, Bristol Place, a recent affordable housing development in the community, was a 90-unit single-family and townhome development with a total budget of \$23 million, dividing out to approximately \$256,000 per unit.

If this HOME-ARP funding is spent on renovating existing housing, then the Consortium estimates that it could renovate 15 housing units (using inflation-adjusted estimates from [this source](#)).

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

As described in the consultation process, the affordable housing produced with HOME-ARP funding will address the lack of area housing that is simultaneously affordable, high quality, accessible, and available to low-income households or those seeking public assistance. Building brand new units funded through HOME-ARP would ensure that all of these attributes are met, while renovations would more significantly increase the number of quality affordable housing units.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A preference permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A method of prioritization is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a 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).*
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and*

civil rights laws and requirements when establishing preferences or methods of prioritization.

*While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.***

*For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population **if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).*

Template:

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: Households belonging to the Homeless and At-Risk of Homelessness Qualified Populations will receive priority in HOME-ARP-funded programs.

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 PJ's needs assessment and gap analysis:

Providing a preference for Homeless and At-Risk of Homelessness households will allow for effective and timely provision of services to these groups, addressing the immediate needs of homeless households and providing the necessary interventions to prevent at-risk households from reaching the point of homelessness. In cooperation with existing homelessness services and other capacity-building efforts occurring locally, prioritization of services for homeless households will ensure that facilities exist to house the specific households in need (including low-barrier facilities, those for families, or others who are not able to stay in congregate shelter), connect the individuals with these services, and provide further supports to achieve and sustain stability. Similarly, due to the estimated 9,583 at-risk households in the county, and the 7,600-unit gap in affordable housing for these households, prompt intervention is key to help connect these households with the assistance that they need to regain stability.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

- 1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;*
- 2. the CE does not include all HOME-ARP qualifying populations; or,*
- 3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE*

*If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).*

Template:

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

To ensure that all qualified populations are eligible and that HOME-ARP-funded programming is in compliance with HOME-ARP guidance, each funded program will use its own specific application process. These applications will follow a first-come, first-served process for qualified

applicants, with the exception of the two preference populations (Homeless and At-Risk of Homelessness) being moved to the top of the list.

If the PJ 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. (Optional):

N/A

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

N/A

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

N/A

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Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- *PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.*
- *A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.*
- *Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.*
- *For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.*
- *PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.*

Template

Describe whether the PJ 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 Urbana HOME Consortium will not utilize any limitations for its HOME-ARP-funded projects.

If a PJ 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 PJ's needs assessment and gap analysis:

N/A

If a limitation was identified, describe how the PJ 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 PJ's HOME-ARP projects or activities):

N/A

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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***

Refinancing cannot be the primary purpose of the HOME investment. Refinancing is only appropriate when HOME funds are loaned to rehabilitate the property for which refinancing is being requested and then only when necessary to permit or ensure continued affordability. To demonstrate that rehabilitation is the primary activity for which HOME funds have been expended in connection with the property, at least \$5,000 per unit average in HOME funds must have been provided for rehabilitation of the property.

- ***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.***

The project sponsor requesting HOME funds for debt refinancing must demonstrate, and the Consortium must confirm, that disinvestment in the property has not occurred, long-term needs of the project can be met through the refinancing, and servicing the targeted population over an extended affordability period is feasible.

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

Refinancing may be approved either to maintain current affordable units or to create additional affordable units.

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

Properties for which refinancing is approved are subject to an affordability period of at least 15 years starting on the date the refinancing is closed.

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

HOME funds cannot be used to refinance multiple-family loans made or insured by any other federal program, including but not limited to, the Community Development Block Grant Program.

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

Properties for which refinancing is approved may be located anywhere within the corporate limits of the Consortium members.

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