DRAFT



**City of West Palm Beach**

**HOME-ARP Substantial Amendment**

**Resolution 26-23**



HOME-ARP Substantial Amendment to FY 2021-22 Annual Action Plan



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**City of West Palm Beach**

**HOME-ARP Allocation Plan**

# **Introduction**

The City of West Palm Beach is an entitlement recipient of federal funds from the U.S. Department of Housing and Urban Development (HUD). The American Rescue Plan Act of 2021 (ARP) appropriated supplemental HOME Investment Partnerships Program (HOME) funds to address the impact of the COVID-19 pandemic on individuals experiencing homelessness and other vulnerable populations through the provision of housing, services, and shelter. HOME-ARP funds can be used for rental assistance, provision of supportive services, development or rehabilitation of affordable rental housing, and acquisition and development of non-congregate shelter units to serve four (4) qualifying populations:

1. Homeless individuals and families
2. Persons at risk of Homelessness
3. Individuals fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking
4. Other populations who do not qualify under any of the populations above but meet one of the following criteria:
	1. Other families requiring support services or housing assistance to prevent homelessness
	2. Those at greater risk for housing instability

The City of West Palm Beach was awarded $1,734,257 under the HOME-ARP program. In accordance with 24 CFR Part 91, the City of West Palm Beach is submitting a substantial amendment proposing to allocate the HOME-ARP grant funds in the FY 2021-2022 Annual Action Plan to eligible activities.

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| **Substantial Amendment** |
| **Substantial Amendment to Action Plan** | **Program Years Affected** |
| **HOME-ARP Award** | **2021** |

HOME-ARP funding in the amount of **$1,734,257** will be allocated to the activities stated below in accordance with the proposed budget:

**Development of Affordable Rental Housing**   **$1,474,119**

The City will utilize these funds to acquire, construct, or rehabilitate affordable rental housing to increase the current rental housing stock available to low- and moderate-income individuals.

**Administration and Planning (15%) $260,138**

The City will utilize these funds for reasonable administrative and planning costs to provide program management, coordination, oversight, and monitoring of the HOME-ARP program.

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| **Public Comment Period** |

Federal regulations require that the City provide the public with reasonable notice of, and an opportunity to comment on any substantial amendments in accordance with 24 CFR 91.105. HOME-ARP requires that the comment period must be open for no less than 15 days. In accordance with the City’s Citizen Participation Plan, the usual 30-day public comment period for substantial amendments may be shortened to follow applicable HUD waivers. The comment period on the HOME-ARP Allocation Plan will commence on February 19, 2023 and end on March 6, 2023**.**

The public is encouraged to comment via mail or email to:

Kimberly Spence, HCD Programs Manager

City of West Palm Beach

Department of Housing and Community Development

401 Clematis Street, 3rd Floor, West Palm Beach, FL 33401

KSSpence@wpb.org

The City of West Palm Beach will consider any comments or views of residents, agencies, or other interested parties received in writing, in preparation of the final amendment. A summary of these comments will be included in the final documents.

|  |
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| **HOME-ARP Allocation Plan** |

The HOME-ARP Allocation Plan is the road map for spending and implementation of the HOME-ARP program. The Allocation Plan must be submitted to HUD by March 31, 2023 for the City to receive the grant funds.

# **Consultation**

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

The City of West Palm Beach Housing and Community Development Department (HCD) hosted a virtual HOME-ARP Informational Session via Zoom on May 19, 2022. The purpose of the webinar was to bring together community stakeholders to discuss the HOME-ARP program, to gather information about the needs and challenges of members of the qualifying populations, to identify gaps in existing resources for the qualifying populations, and to identify opportunities for collaboration.

During the webinar, HCD staff provided an overview of the HOME-ARP program, defined the qualifying populations and eligible activities, discussed the city’s allocation amount, reviewed the requirements of the HOME-ARP Allocation Plan, and solicited input from attendees on key topics including the priority needs of the qualifying populations, unmet needs that are not addressed with current funding, and characteristics and barriers to affordable housing in the community. To increase participation, the webinar was recorded and posted to the HCD webpage at [http://wpb.org/housing](https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwpb.org%2Fhousing&data=05%7C01%7CKSSpence%40wpb.org%7C17a8d830557e49a3bcb008da39cbbfd1%7Ca2709f4de440488c85f0c504b3e46af2%7C0%7C0%7C637885844527192325%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=DXSh8%2F7I9vpFHpyzux7KD8hfPCwVZRi%2BXivm9IArLmQ%3D&reserved=0).

The City utilized various outreach methods to inform community members of the opportunity to provide input on the use of the HOME-ARP funds including direct email outreach to a stakeholder list comprised of the Continuum of Care, Palm Beach County, housing providers, housing counseling agencies, fair housing organizations, neighborhood organizations, agencies and organizations that serve persons experiencing homelessness, persons with disabilities, and other vulnerable populations. Other outreach methods included postings to the City’s website and social media outlets as well as a notice in the Mayor’s weekly newsletter, the Insider Newsletter. As a follow up to the webinar, the City utilized a survey tool to collect additional input to inform how the HOME-ARP funds would be distributed for eligible activities.

Approximately 30 individuals attended the webinar and nine completed surveys were received. Any agencies or organizations that the City was required to consult with that did not participate in the meeting, the City attempted to or contacted directly.

***List the organizations consulted:***

| Agency/Org Consulted | Type of Agency/Org | Qualifying Population Served | Method of Consultation | Feedback  |
| --- | --- | --- | --- | --- |
| Homeless and Housing Alliance of Palm Beach County | Continuum of Care | HomelessAt-Risk of Homelessness | Public Meeting | Expressed interest in partnering with West Palm Beach. |
| Vita Nova Inc. | Homeless Service Provider | HomelessAt-Risk of Homelessness | Public Meeting | No feedback received. |
| Palm Beach County Housing Authority | PHA | At-Risk of HomelessnessOther Populations | Public Meeting | No feedback received. |
| The Lord’s Place | Homeless Service ProviderSocial Services Provider/Employment/Victims of Domestic Violence | HomelessAt-Risk of HomelessnessOther Populations | Public MeetingInternet Outreach: Web-based survey | The agency identified a gap in the system as housing that is truly affordable for those whose primary or sole source of income is Social Security benefits, particularly those who are age 55 and older who are homeless but have not been homeless for a year or more or otherwise don't qualify as "chronically homeless." Older adults are the fastest growing portion of the homeless population and more housing options are needed for them to be placed quickly as they are particularly vulnerable when experiencing homelessness. Older adults experiencing homelessness have health vulnerabilities that make it untenable for them to live on the streets for extended periods of time, they require shelter and sufficient support to address acute and chronic health conditions. Another gap is that many individuals exiting longer term stays in institutions who do not have a place to live upon exit cannot qualify for many forms of homeless assistance, even though there is a shortage of supportive housing options in our community for this population. The priority needs for the qualifying populations include access to long term housing that is safe and affordable, as well as livable incomes, access to healthcare and health insurance, and access to improved means of transportation. Current funding does not address the extent of the anticipated need for affordable and Assisted Living options for extremely low-income older adults who have experienced homelessness. There is also a need for more affordable Assisted Living options for older adults who are low income including those who are currently residing in supportive housing but would benefit from a higher level of care. Those who are exiting institutions and returning to West Palm Beach benefit from the supportive services, structure, and accountability that supportive housing provides.  |
| Gulfstream Goodwill Industries | Homeless Service ProvidersPersons with Disabilities | HomelessAt-Risk of Homelessness | Public Meeting | No feedback received. |
| West Palm Beach Housing Authority | PHA | At-Risk of HomelessnessOther PopulationsDomestic Violence/Sexual AssaultVeterans | Public MeetingInternet Outreach: Web-based survey | Housing resources should be used to develop or rehabilitate rental housing to increase the affordable housing stock and for the provision of supportive services. There is a limited stock of affordable housing. Priority needs includes security deposit assistance as individuals are unable to lease because landlords require first, last and security deposit. |
| Community Partners of South Florida | Housing ProviderSocial Services Provider | HomelessAt-Risk of HomelessnessOther Populations | Public Meeting | No feedback received. |
| Northend RISE | Housing ProviderSocial Services Provider | HomelessAt-Risk of HomelessnessOther Populations | Public MeetingInternet Outreach: Web-based survey | The agency identified the need for additional rental units and more financial assistance and a preference for seniors.  |
| Florida Housing Coalition | Statewide Non-Profit/TA Provider | HomelessAt-Risk of HomelessnessOther PopulationsDomestic Violence/Sexual Assault | Public Meeting | No feedback received. |
| Neighborhood Renaissance | Housing Provider | HomelessAt-Risk of HomelessnessOther PopulationsDomestic Violence/Sexual Assault | Public MeetingInternet Outreach: Web-based survey | The agency identified the lack of affordable inventory across the board as a gap in the shelter and housing system for the qualifying populations and the priority need as permanent affordable rentals. Neighborhood Renaissance owns rental housing and has zero vacancies and does not have the capacity to keep a waiting list. The agency advocated for the Allocation Plan to include the preservation and rehab of existing properties because tenants are at-risk for homelessness. Additionally, construction costs have risen exponentially in the last two years and there are existing projects in the pipeline that now are at the beginning stages and require gap financing due to the construction increases.  |
| Palm Beach County Department of Human Services | Public Agency – addressing the needs of all QPs | HomelessAt-Risk of HomelessnessOther PopulationsDomestic Violence/Sexual Assault | Public Meeting | Expressed interest in partnering with West Palm Beach and jointly working on the Needs and Gap analysis. |
| Housing Leadership Council of Palm Beach County | Nonprofit/ Housing coalition | HomelessAt-Risk of HomelessnessOther PopulationsDomestic Violence/Sexual Assault | Public Meeting | No feedback received. |
| The Arc of Palm Beach County | Social Services Provider/Persons with Disabilities | HomelessAt-Risk of HomelessnessOther Populations | Public Meeting | No feedback received. |
| Ruth and Norman Rales Jewish Family Services, Inc.  | Social Services Provider/Victims | At-Risk of HomelessnessDomestic Violence/Sexual Assault | Internet Outreach: Web-based survey | Gaps identified include the lack of affordable or attainable housing options for older adults, adults with special needs, or families facing homelessness. Persons of low- to moderate-income and those who have an income too high to qualify for Section 8 should be considered for a preference.  |
| Urban League of Palm Beach County | Social Services ProviderHUD Housing Counseling Agency | HomelessAt-Risk of HomelessnessOther PopulationsVeterans | Internet Outreach: Web-based survey | Available funds should be made available to provide Home Counseling (First Time Home Buyers, Foreclosure prevention & Intervention), Financial Literacy Classes for young adults, families, and senior citizens. Funds should also be used to develop and help non-profits create single family homes for sale and or rental with a focus on those at 50% AMI or below. |
| Fair Housing Center of the Greater Palm Beaches  | Fair HousingLegal Services | At-Risk of HomelessnessOther Populations | Internet Outreach: Web-based survey | HOME-ARP funds should be used for rental assistance for renters currently experiencing high rental increases and non-profit operating and capacity building. With the current crisis of skyrocketing rental increases in WPB there needs to be a plan for more emergency housing for those who are currently or about become homeless. Preference should be considered for families with children and persons with disabilities. Priority needs and unmet needs include equal access to fair and affordable housing and fair housing education and outreach. |
| Legal Aid Society of Palm Beach County | Fair HousingLegal Services | HomelessAt-Risk of HomelessnessOther PopulationsDomestic Violence/Sexual AssaultVeterans | Internet Outreach: Web-based survey | There is a great need for rental assistance now that the COVID era programs are mostly gone. There is a lack of affordable housing for low and very low-income residents. More navigators are needed to help find affordable housing beyond apartment complexes and mobile home parks. Priority needs include rental assistance and help finding rental units that clients can afford (especially clients receiving disability benefits). Preference should be considered for seniors with fixed income who are no longer able to work.  |
| Palm Beach County Victim Services | Public Agency – addressing the need of a qualifying population | Domestic Violence/Sexual Assault | Direct Outreach: Email | No response received. |
| YWCA of Palm Beach County | Social Services Provider | HomelessDomestic Violence/Sexual Assault | Direct Outreach: Email | Provided data for the Needs Assessment and Gap analysis. |
| Not identified | Social Services Provider | HomelessAt-Risk of HomelessnessOther Populations | Internet Outreach: Web-based survey | Gaps in the shelter and housing system include deposit and application fees for those with a housing voucher and temporary shelter until the next unit is available. A priority need is fair housing assistance for homeowners who will become homeless without help to save those homes. Individuals who are considered to be the working poor should be considered for a preference. Unmet needs include legal assistance for foreclosure prevention for current homeowners. |

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

The feedback from the agencies/organizations consulted prior to the development of the HOME-ARP Allocation Plan overwhelmingly identified the need for more affordable rental housing in the City of West Palm Beach.

The most common gaps in housing and supportive services was housing for seniors or persons with disabilities that rely on a fixed income from Social Security benefits or Social Security Disability Insurance (SSDI). Families at -risk of homelessness were also identified as a qualifying population with a high level of need due to the limited supply of affordable housing. Participants in the City’s informational session/public meeting and survey respondents identified the following housing and services as priority needs: access to permanent and affordable housing, supportive housing, living wages, access to healthcare and health insurance, improved transportation options, security deposit assistance, rental assistance, and housing navigators to assist residents with finding available rental units.

Some of the barriers to accessing affordable housing include high move-in costs and increasing rent prices. The West Palm Beach Housing Authority (WPBHA), identified the main challenges voucher holders encounter in locating units as poor credit history and landlords requesting rents that are higher than the HUD-approved small area FMR, even at the PHA’s higher rent standard (120% of FMR). These factors contribute to severely constricted housing options for voucher holders. The WPBHA is currently operating at an 87.5% voucher utilization rate and has a Section 8 Housing Choice Voucher waiting list of 3,000 applicants.

Based on the feedback received during the consultation, the City is allocating 85% of the HOME-ARP funds to the development of affordable rental housing. The remaining 15% of the grant funds will be used for administration and planning costs.

# **Public Participation**

***Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:***

* ***Date(s) of public notice: 2/19/2023***
* ***Public comment period:*** *start date -* ***2/19/2023*** *end date -* ***3/6/2023***
* ***Date(s) of public hearing: 3/6/2023***

***Describe the public participation process:***

The City of West Palm Beach followed its process for citizen comment on substantial amendments as described in the City’s Citizen Participation Plan. The proposed HOME-ARP Allocation Plan was made available for public review and comment between Sunday, February 19, 2023 and Monday, March 6, 2023. The City published a combined notice of public hearing and public comment period in the Palm Beach Post (newspaper of general circulation) on February 19, 2023 informing the public of the availability of the plan for review and comment. In accordance with the Citizen Participation Plan, the usual thirty (30) day public comment period was shortened based on applicable HUD waivers for the HOME-ARP Allocation Plan which required a minimum 15-day comment period.

The draft Allocation Plan was made available for viewing on the City’s website at <https://www.wpb.org/government/housing-community-development/reports> and at the City of West Palm Beach Department of Housing and Community Development, 401 Clematis Street, West Palm Beach, FL 33401. All interested parties were invited to submit written comments to be considered before going to the City Commission for approval. Written comments could be mailed or submitted via email. The City held a City Commission public hearing on March 6, 2023 for approval of the substantial amendment to the FY 2021-2022 Annual Action Plan and authorization to submit the Allocation Plan to HUD.

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

To broaden public participation, the public hearing was held in the evening to encourage maximum attendance and participation. Additionally, the public hearing was held in-person and virtually. The meeting was also televised on WPB-TV, the City’s office television station. The City worked with service providers to advertise the availability of the draft plan for review and comment. A recording of the HOME-ARP Information Session, a webinar the City held on May 19, 2022, was posted to the City’s website to make more information available on the purpose of the program, eligible activities, and the City’s HOME-ARP allocation amount.

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

To be completed at the end of the public comment period.

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

To be completed at the end of the public comment period.

# **Needs Assessment and Gaps Analysis**

**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 | 127 | 25 | 79 | 0 | 0 |  |  |  |  |  |  |  |  |
| Transitional Housing | 0 | 0 | 53 | 0 | 0 |  |  |  |  |  |  |  |  |
| Permanent Supportive Housing | 0 | 0 | 72 | 56 | 0 |  |  |  |  |  |  |  |  |
| Other Permanent Housing | 0 | 0 | 0 | 0 | 0 |  |  |  |  |  |  |  |  |
| Sheltered Homeless |  |  |  |  |  | 106 | 75 | 0 | 42 |  |  |  |  |
| Unsheltered Homeless |  |  |  |  |  | 1 | 227 | 16 | 0 |  |  |  |  |
| ***Current Gap*** |  |  |  |  |  |  |  |  |  | - | - | 98 | - |

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

**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 | 21,235 |  |  |
| Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness) | 1,030 |  |  |
| Rental Units Affordable to HH at 50% AMI (Other Populations) | 620 |  |  |
| 0%-30% AMI Renter HH w/ 1 or more severe housing problems(At-Risk of Homelessness) |  | 3,080 |  |
| 30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations) |  | 2,210 |  |
| ***Current Gaps*** |  |  | 3,640 |

**Data Source:** 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

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

HOME-ARP funds are required to primarily benefit individuals and families from four qualifying populations. This section of the Allocation Plan evaluates the size and demographic composition of all four of the qualifying populations and assesses the unmet needs of each of those populations.

1. ***Individuals and families experiencing homelessness***

Individuals and families experiencing homelessness is defined by 24 CFR 91.5 as persons lacking a fixed, regular, and adequate nighttime residence. The definition also includes persons who will imminently lose their primary nighttime residence, and families with children or unaccompanied youth who may meet the definition of homeless under other federal statutes as identified in 24 CFR 91.5.

To estimate the number of persons experiencing homeless in West Palm Beach, the City consulted with the Homeless and Housing Alliance of Palm Beach County (HHA), the lead agency for the Continuum of Care (CoC). The City also consulted with the YWCA of Palm Beach County, operator of Harmony House, a 74-bed, year-round, 24-hour shelter for women and their children who are victims of domestic abuse.

According to data from the CoC and the YWCA, for FY 2020-2021, a total of 1,183 individuals were sheltered in three emergency shelters that serve City residents – Gulfstream Goodwill Industries’ Lewis Center, Adopt-A-Family of the Palm Beaches Program REACH, and YWCA of Palm Beach County’s Harmony House. Note that these three shelters are not limited to City residents and serve individuals throughout the County. The sheltered homeless population count included 23 veterans, 454 victims of domestic violence (including 187 children), and 169 youth (18-24) households. The table below provides a breakdown of sheltered clients by race and ethnicity.

| **Race/Ethnicity** | **Number** | **%** |
| --- | --- | --- |
| White | 335 | 28.3% |
| Black of African American | 800 | 67.6% |
| Asian | 10 | 0.8% |
| American Indian or American Native | 4 | 0.3% |
| Native Hawaiian or Other Pacific Islander | 5 | 0.4% |
| Multi-Racial | 27 | 2.3% |
| Data not collected | 2 | 0.2% |
| **Total** | **1,183** | **100%** |
| Hispanic | 171 | 14.5% |
| Not Hispanic | 985 | 83.3% |
| Other/Data not collected | 27 | 2.2% |
| Total | **1,183** | **100%** |

**Data Sources:** 1. Palm Beach County Community Services Dept. - Clients served in Emergency Shelter at The Senator Philip D. Lewis Center and Program REACH (10/1/2020-9/30-2021); 2. YWCA of Palm Beach County - Clients served in Emergency Shelter at Harmony House (7/1/2020-6/30/2021).

Annually, the CoC coordinates the point-in-time (PIT) count to determine the number of sheltered and unsheltered people experiencing homelessness on a single night in January, within a 24-hour period. The 2022 PIT count identified 230 unsheltered individuals or 218 households experiencing homelessness within the West Palm Beach city limits. This count included 82 homeless individuals or 77 households that demonstrate chronic patterns of homelessness. That is, people that have experienced homelessness for at least a year – or repeatedly – while struggling with a disabling condition. Most of the City’s unsheltered homeless persons are male (75%) and between the ages of 18- 24 (93%). Other demographic information collected indicate that unsheltered homeless persons are primarily Black/African American individuals (59%) followed by white individuals (36%). Over 92% of unsheltered homeless persons are of non-Hispanic origin. As shown in the Homeless Needs Inventory and Gap Analysis Table, based on data from HUD’s 2021 Housing Inventory Count and the 2022 PIT Count, there is an unmet need in the current housing and shelter inventory of approximately 98 adult beds and a gap in family beds in non-shelter housing.

1. ***Individuals and families at-risk of homelessness***

At risk of homelessness is defined at 24 CFR 91.5 as a household with an annual income under 30% of area median income (AMI), without sufficient resources or support networks such as family or friends to prevent them from becoming homeless, and experiencing conditions such as housing instability, living in a hotel or motel not paid for by any programs, or sharing a home with someone due to economic hardship, among other conditions.

The City’s Consolidated Plan defines individuals and families at -risk of homelessness as households experiencing cost burden caused by the gap between housing costs and income. The Consolidated Plan further defines persons at imminent risk of homelessness as those with high rent burden, especially when rent is above 50% of monthly income.

Based on these definitions, for purposes of describing the size of the population at risk-of homelessness, the City considers renter households with income below 30% AMI and with one or more severe housing problems as eligible to receive assistance under HOME-ARP. The four severe housing problems are incomplete kitchen facilities, incomplete plumbing facilities, overcrowding, and cost burden greater than 50%.

According to data from the Comprehensive Housing Affordability Strategy (CHAS) for the 2015-2019 period, the most recent CHAS data available, there were 4,585 renter households with an annual income below 30% AMI. The data show that approximately two-thirds or 3,080 of these renter households, had at least one of the four severe housing problems and met the definition of at-risk of homelessness. In West Palm Beach, there were 1,030 rental units affordable to households at 30% AMI, resulting in a gap of 2,050 rental units for households at 30% AMI.

Of the four severe housing problems, the greatest housing problem impacting renter households at 30% AMI is severe cost burden: 2,490 (54%) of the 4,585 households pay rent and utilities that is more than 50% of their gross income. This is followed by 510 households living in overcrowded conditions (more than one person per room) and 85 households living in substandard housing.

Black or African American renter households at or below 30% AMI are at a greater risk of becoming homeless compared to other racial and ethnic groups as shown in the table below.

|  |  |  |
| --- | --- | --- |
| **Race/Ethnicity** | **Household has 1 or more of the 4 severe housing problems and income is less than or equal to 30% AMI** | **%** |
| White | 875 | 28.4% |
| Black or African American | 1,380 | 44.8% |
| Asian | 55 | 1.8% |
| American Indian or Alaska Native | 0 | 0.0% |
| Pacific Islander | 0 | 0.0% |
| Hispanic, any race | 720 | 23.4% |
| **Total** | **3,080** | **100%** |

**Data Source:** 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

1. ***Individuals and families fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking***

Based on the 2022 PIT count, there were 42 individuals fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking.

The City also consulted with the YWCA of Palm Beach County for data for this qualifying population. During fiscal year 2020-2021, the Harmony House domestic violence shelter provided shelter for 170 female adults and 187 children for a total of 357 women and children. 84 victims suffered both domestic violence and sexual violence. For the same period, Harmony House was unable to provide shelter for 45 callers.

1. ***Other populations for whom supportive services or assistance would prevent homelessness or serve those with the greatest risk of housing instability***

There is a two-part definition of individuals and families that are classified as Other populations:

1. Households who were formerly homeless but are currently housed due to temporary or emergency assistance, and who may need additional housing assistance or supportive services to avoid a return to homelessness.
2. Households at greatest risk for instability defined by HUD as (i) households with an annual household income at or below 30% of the AMI and is experiencing severe cost burden or (ii) a household with an annual income that is less than or equal to 50% of the AMI and that is also at risk of homeless as defined at 24 CFR 91.5.

To avoid a duplicative count of eligible households for this qualifying population, the City is excluding extremely low-income (≤ 30% AMI) and severely rent burdened households as part of the Other population group since this segment of the population was included under the “individuals and families at-risk of homelessness” qualifying population.

To quantify the size of this qualifying population, the City is considering households with income between 30-50% AMI with one or more severe housing problems as eligible to apply for assistance under this qualifying population. According to the CHAS, there were 3,865 renter households with an annual income between 30-50% AMI. The data show 2,210 of these renter households, has at least one of the four severe housing problems and may be experiencing housing instability or require housing assistance. In West Palm Beach, there were 620 rental units affordable to households at 30-50% AMI, resulting in a gap of 1,590 rental units for households at 30-50% AMI.

|  |  |  |
| --- | --- | --- |
| **Race/Ethnicity** | **Household has 1 or more of the 4 severe housing problems and income is less than or equal to 30-50% AMI** | **%** |
| White | 840 | 38.6% |
| Black or African American | 680 | 31.3% |
| Asian | 15 | 0.7% |
| American Indian or Alaska Native | 0 | 0.0% |
| Pacific Islander | 0 | 0.0% |
| Hispanic, any race | 640 | 29.4% |
| **Total** | **2,210** | **100%** |

**Data Source:** 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing***

The Department of Housing and Community Development, particularly the Community Resources/Vickers House Division, provides funding, direct services, and programs for persons experiencing homelessness including permanent housing, supportive housing, rapid rehousing, food assistance, relocation assistance, assessments, referral services, and job placement assistance.

The City works closely with the Homeless and Housing Alliance (HHA) of Palm Beach County (the Continuum of Care lead agency) whose main function is to deliver a comprehensive and coordinated continuum of services for homeless individuals, families with children, veterans, and unaccompanied youth. This system’s fundamental components include homeless prevention, outreach and assessment, emergency shelter, supportive services, permanent housing, and supportive housing.

The City also facilitates a monthly meeting where homeless agencies and City staff share information, explore resources for clients in need, and discuss ways to streamline the point of entry for potential clients. This has helped to target the use of the limited resources that are offered to people who are experiencing homelessness. It has also assisted in prioritizing assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner.

The City leverages its resources with nonprofit and private sector organizations. Annually, the following resources are made available for various homeless assistance programs and activities that are supported or delivered by the City:

* Engagement Team & Peer Outreach Program funded with approximately $145,000 in CDBG public services funding and $150,000 from the WPB Downtown Development Authority;
* Homeward Bound bus pass and relocation services funded with approximately $10,000 in local funding;
* Tenant-based rental assistance (TBRA) and supportive housing funded with an allocation of approximately $3.2M annually in Housing Opportunities for Persons with AIDS; and
* Rental Deposit Assistance/Housing Stabilization Program funded with $50,000 in State Housing Initiative Partnership funding from the state of Florida; and
* Serving Our Seniors Program funded with $5,000 annually to provide temporary financial assistance to seniors over age 62 in the event of an emergency or financial hardship with utility assistance.

The Senator Philip D. Lewis Center, a 66-bed emergency facility, serves as the main point of access for homeless services in Palm Beach County including access to emergency shelter, rapid rehousing, and permanent supportive housing services.  Homeless individuals and families are referred to the Lewis Center from both the Community Resources/Vickers House staff and the West Palm Beach Police Department. Vickers House staff also assists the Lewis Center with conducting initial screenings over the telephone. The City of West Palm Beach will continue to support efforts to provide additional shelter and transitional housing beds as funding permits.

In addition to the Lewis Center and the HHA, other City partners include faith-based organizations, substance abuse treatment centers, the Homeless Coalition of Palm Beach County; the Palm Beach County Division of Human Services, the Health Care District of Palm Beach County, Continuum of Care and Ryan White Service Providers, The Lord’s Place, Catholic Charities, West Palm Beach VA Medical Center, Gulfstream Goodwill, St. Ann Place, Vita Nova, South County Mental Health; Family Promise; and Center of Hope.

Current shelter and housing inventory

* The Senator Philip D. Lewis Center serves as Palm Beach County’s homeless resource center and acts as the central point of access for individuals and families seeking to end their homelessness. Clients of the Lewis Center are connected to supportive services and housing. There are 60 adult-only beds: 20 beds in the women’s dorm and 40 beds for men.
* Program REACH is the largest emergency shelter for families with children experiencing homelessness in Palm Beach County. The program has 19 apartments and a total of 74 family beds.
* Harmony House is a 72-bed emergency shelter for victims of domestic abuse and their children providing 24-hour hotline, 24-hour shelter, children’s services, food and other basic needs, referrals, and case management.
* Vita Nova focuses on eliminating homelessness for youth ages 18 to 25 years old by providing housing services to youth who identify as LGBTQ+ through the RHY Transitional living program (10 beds). Vita Nova Village provides housing for young adults at-risk of homelessness and has capacity for up to 28 individuals.
* The Salvation Army Center of Hope transitional housing program serves Veterans in a 2-year program that offers housing and supportive services including comprehensive substance abuse treatment, case management, mental health screening, adult basic educations, and reintegration services. The GPD facility is a 15-bed facility.
* The Dr. Alice Moore Apartments is a 36-unit supportive housing project. All units are set-aside for residents making less than 60% AMI with 26 units reserved for adults living with severe mental illness.
* Home at Tamarind, developed by Gulfstream Goodwill, provides six units of affordable housing for individuals with a documented developmental disability who are homeless or at risk of homelessness.
* The Village Phase I is a collaboration between Community Partners of South Florida and the Southeast Behavioral Health Network to provide a 20-unit supportive housing complex for individuals who are at-risk of homelessness.

Note that while these emergency shelters, transitional housing facilities, and permanent supportive housing developments are located in the City of West Palm Beach, they do not serve City residents exclusively.

Affordable Housing Inventory

According to data from the Florida Housing Data Clearinghouse (Shimberg Center), there are approximately 3,400 affordable rental units in the City. CHAS data indicates that 1,650 rental units are affordable to households at or below 50% AMI while there is a need for 5,290 rental units for residents at this income level, resulting in a gap of 3,640 units. Recognizing the need for additional affordable rental units, the City currently has under construction or in pre-development, over 300 rental units expected to be added to the inventory within the next two years.

Rental Assistance Programs

There are several rental assistance programs available in Palm Beach County that residents of the City may access. Many of these programs came online during the last two years due to the economic hardship caused by the COVID-19 pandemic. These programs include the Emergency Rental Assistance (ERA) program, Emergency Solutions Grant – CARES Act (ESG-CV), and the Emergency Housing Voucher Program. The ERA and ESG-CV programs are administered by the Palm Beach County Department of Community Services and has prevented homelessness for over 30,000 households in the past two years. During fiscal year 2021 (October 1, 2020 - September 30, 2021), 298 households were assisted with ESG-CV funding in Palm Beach County.

In addition to these COVID relief funds, a primary source of rental assistance is the Housing Choice Voucher (HCV) program that is administered by the West Palm Beach Housing Authority (WPBHA) and Palm Beach County Housing Authority (PBCHA).

As of January 2023, there were 3,115 families utilizing HCVs managed by the WPBHA. The WPBHA in partnership with the CoC administers the Emergency Housing Voucher Program available through the American Rescue Plan Act (ARPA). Emergency Housing Vouchers (EHVs) are targeted to individuals and families who are homeless, at-risk of homelessness, fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability. According to information available on the EHV Data Dashboard, the WPBHA administers 107 emergency housing vouchers. As of February 2023, 72 households have been served by the EHV program and another 28 households are searching for a unit.

***Describe the unmet housing and service needs of qualifying populations:***

***Homeless as defined in 24 CFR 91.5***

The immediate need of individuals who are experiencing homelessness is access to affordable rental housing. According to the 2022 PIT count, 230 homeless individuals were unsheltered in the City, including 82 individuals who were chronically homeless. Chronically homeless persons need access to permanent supportive housing where they can benefit from long term housing stability and supportive services. Permanent supportive housing reduces the demand on hospitals, jails, and other crisis intervention services that may be needed to address health conditions, mental illness, and/or substance abuse disorders that are not being properly managed by individuals that are living on the street or in a shelter.

In addition to affordable rental housing and permanent supportive housing, persons who are homeless also require supportive services including financial assistance to cover move-in costs, rent assistance, reliable transportation options, childcare, job training programs, and healthcare.

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

The needs of individuals and families at-risk of homelessness include immediate needs and long-term needs to maintain self-sufficiency. In the short-term, persons at-risk of homelessness need to maintain the housing that they currently occupy. For renters at 30% AMI, this could mean rent subsidies and utility assistance. COVID relief funding including the Emergency Rental Assistance (ERA) program, Emergency Solutions Grant – CARES Act (ESG-CV), and Emergency Housing Vouchers (EHV) has enabled people already experiencing homelessness and persons behind on rent to eliminate past housing debt and maintain housing. However, these funding sources are time-limited and agencies and organizations that were consulted for preparation of this Allocation Plan have expressed a need for rental subsidies to continue assistance for those who are still vulnerable to losing housing.

According to the 2022 Rental Market Study prepared by the Shimberg Center for Housing Studies, Palm Beach County has a deficit of 24,340 affordable and available rental units for households at 0-30% AMI, with only 16 affordable and available units per 100 renter households at the 30% AMI income level. Palm Beach County is also one of the counties with the most units at risk of being lost from the affordable housing inventory due to expiring subsidies. As mentioned above, the CHAS data for the City of West Palm Beach also showed a gap in the number of rental units affordable to households at 30% AMI of 2,050 units. One way to address this deficit is through the development of affordable rental housing.

While the City utilizes federal, state, and local resources to produce affordable housing units in partnership with for-profit and non-profit developers, it requires a significant amount of subsidy and leveraging of resources to develop units that are affordable to households at 30% AMI. A main source of rental housing for this qualifying population (individuals and families at risk of homelessness) is public housing units and housing vouchers. Data from the WPBHA indicated that of 3,115 voucher holders, 2,487 or 80% were extremely low-income households. Waiting list data from the WPBHA demonstrates the unmet need for this qualifying population. As of January 2023, there were 141 households on the waiting list for the Emergency Housing Voucher program and 3,000 households on the waiting list for Housing Choice Vouchers. Over 72% and 67% of applicants on these two waiting lists were extremely low-income, respectively.

Generally, extremely low-income households spend most of their income on housing costs and do not have sufficient funds to cover other basic expenses such as food, medication, or transportation. Therefore, emergency financial assistance, transportation, and affordable health insurance are other unmet needs that this qualifying population often have. Long-term needs include employment training, educational programs, and access to jobs paying a living wage. For those families with children that are not yet school-aged, affordable childcare and early childhood programs are needed.

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

According to the Florida Department of Law Enforcement Uniform Crime Report for 2020, the West Palm Beach Police Department reported 552 domestic violence related offenses. However, the number of families or individuals in need of housing who have experienced domestic violence is difficult to determine as many incidents go unreported to law enforcement agencies, assistance groups, or emergency shelters. The 2022 PIT Count found that, of the sheltered homeless individuals, 42 were experiencing or fleeing a domestic violence situation.

The needs for victims of domestic violence center around finding adequate shelter and access to supportive services to return to financial and emotional stability. The Department of Children and Families (DCF) 2021-2022 Annual Report identified the main services sought by victims of domestic violence as emergency shelter and critical services including legal services related to child custody issues, divorce, and parenting rights; temporary economic assistance to escape a violent partner; economic empowerment services to help survivors gain financial independence; counseling and case management; employment training program; and referral services.

For victims exiting shelter, there is a need for transitional housing. Market rate units are not affordable for low-income families and there is often a waiting list for subsidized units. The Florida Coalition Against Domestic Violence in its 2019-2020 Capital Needs Assessment, stated that survivors take longer to secure housing due to the shortage of safe, affordable, and permanent housing, forcing them to stay in shelter longer than intended, live in substandard conditions, or return to their batterers.

***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***

This qualifying population has a need for affordable rental housing as well as homeless prevention assistance. In addition to the challenges presented by being extremely low to very-low income, living on a fixed income, physical health issues, mental health problems, substance abuse issues, involvement with the criminal system, and limited social assistance programs can all increase the risk of homelessness. Therefore, persons at risk of greater housing instability also have a need for employment, transportation, financial assistance to meet basic needs, utility assistance, and childcare.

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

The most recent data from the 2021 Housing Inventory Count (HIC) report and the 2022 PIT count show that the only housing available to homeless families with children is limited to emergency shelter beds or units. There are very few, if any, transitional housing, or permanent supportive housing for families in West Palm Beach. The data also showed that there is a gap in shelter and housing beds for adult households without children.

Regarding the non-homeless housing inventory, there is a significant gap in the number of affordable rental units available to renter households below 30% AMI and renter households at 30-50% AMI. Based on CHAS data, there is a need for an additional 3,640 rental units: 2,050 units at 30% AMI and 1,590 units at 30-50% AMI.

Gaps also exist in the availability of services. Based on the feedback from the agencies that were consulted for this Allocation Plan, there is a need for the following supportive services: housing search/navigation services; legal services; transportation; financial assistance to help with rental application fees, first and last monthly rent, and security deposits; rent assistance; credit repair; housing counseling; and substance abuse treatment services and mental health services for persons exiting institutions or mental health facilities.

***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:***

The City is not including any other conditions or additional housing characteristics linked with instability and increased risk of homelessness to describe “households at the greatest risk of instability”. The City will utilize the definition of “Other Populations” in the HOME-ARP Notice.

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

Data from the needs assessment and the consultation process identified the development of affordable rental housing and permanent supportive housing as the priority needs for all four qualifying populations. Palm Beach County residents have been fortunate to benefit from the influx of COVID-19 funding for homeless prevention and rapid rehousing. HOME-ARP funding presents an opportunity to create new permanent affordable housing for persons experiencing homeless and those at risk of homelessness.

***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:***

The level of need and gaps in the housing and shelter inventory was determined through shelter and housing data from the Housing Inventory Count and data from the 2022 Point-In-Time Count. Non-homeless needs were determined by data from the Comprehensive Housing Affordability Strategy (CHAS). Feedback gathered through the consultation process through an informational session attended by service providers and stakeholders, an online survey, and direct outreach to key agencies and organizations, reinforced the quantitative data and provided insight into the need for supportive services.

# **HOME-ARP Activities**

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

The City has an open submission process for accepting project proposals to fund the new construction or acquisition and rehabilitation of rental developments. All developers will be required to apply for funding through a formal application. Eligible applicants may include non-profit and for-profit developers, and public housing authorities.

The City may also exercise other options when soliciting applications for HOME-ARP funding. These options include soliciting applications through a Request for Proposals or Notice of Funding Availability process or utilizing a non-competitive process to select a developer based on the following selection criteria.

Selection criteria to determine the developer may include, but not be limited to:

* Capacity and capability to carry-out the project;
* Experience in completing similar projects;
* Leveraging or ability to pair HOME-ARP funding with other resources, such as housing vouchers, services, or project funding;
* Neighborhood compatibility;
* Ability to provide or partner with another agency/organization to provide wrap-around supportive services; and
* Demonstration of site control.

***Describe whether the PJ will administer eligible activities directly:***

The City of West Palm Beach, the participating jurisdiction (PJ), will not administer eligible activities directly. Housing development activities and/or services will be implemented by developers, service providers, contractors, or subrecipients. The City is responsible for program administration, general oversight, and monitoring of HOME-ARP funds.

***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:***

The City did not provide any HOME-ARP administrative funds to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP Allocation Plan.

***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.***

**Use of HOME-ARP Funding**

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Funding Amount** | **Percent of the Grant** | **Statutory Limit** |
| Supportive Services  | $ 0 |  |  |
| Acquisition and Development of Non-Congregate Shelters  | $ 0 |  |  |
| Tenant Based Rental Assistance (TBRA)  | $ 0 |  |  |
| Development of Affordable Rental Housing  | $ 1,474,119 |  |  |
| Non-Profit Operating  | $ 0 | 0 % | 5% |
| Non-Profit Capacity Building  | $ 0 | 0 % | 5% |
| Administration and Planning | $ 260,138 | 15 % | 15% |
| **Total HOME ARP Allocation**  | $ 1,734,257 |  |  |

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

HOME-ARP funds will be distributed for the development of affordable rental housing, including permanent supportive housing. The lack of affordable housing was the highest priority need identified in the needs assessment and gap analysis, based on the Homeless and Housing Needs Inventory and Gaps Analysis Table, as well as feedback from non-profit providers, housing providers, and the public agencies consulted.

Affordable rental housing projects may include new construction or acquisition and rehabilitation and must comply with all the requirements for HOME-ARP rental housing included in the HOME-ARP Notice. The HOME-ARP funds will be used as gap funding and will be leveraged with other funding sources to create a financially feasible and viable project.

***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 needs assessment and gap analysis identified a lack of transitional and permanent supportive housing beds for homeless individuals and families. This, coupled with the shortage of affordable and available rental units at or below 50% AMI, along with feedback received from numerous service providers and stakeholders, provided justification for utilizing the HOME-ARP funds for the development of affordable rental housing.

# **HOME-ARP Production Housing Goals**

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

The City of West Palm Beach estimates that it will produce or support the development of approximately 5-10 affordable rental housing units for qualifying populations.

***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:***

The City based its HOME-ARP housing production goal on the amount of HOME-ARP funds allocated for rental housing and the average per unit development cost for rental housing. The City will address the priority needs by funding the acquisition, rehabilitation, or construction of affordable rental housing. The HOME-ARP funding will leverage other resources to increase the affordable rental housing available and accessible to qualifying populations.

# **Preferences**

***Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:***

The City intends to select a project(s) that will give all four qualifying populations access to the HOME-ARP activity. The City will not exclude any eligible individuals from applying for HOME-ARP assistance. However, the City will target the assistance by adopting the following preferences for HOME-ARP activities:

City-adopted preference: (i) Families experiencing homelessness

 (ii) Individuals and Families at risk of homelessness

Establishing this preference means that priority will be given in the selection and admission of applicants to HOME-ARP projects before another eligible qualifying population applicant that does not qualify for preference.

***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:***

The needs assessment identified an unmet need for transitional and permanent supportive housing for families as well as a gap in the number of rental units affordable to households at or below 50% AMI. By establishing a preference for families experiencing homelessness and for those at risk of homelessness, persons with the greatest priority need will have improved access to available rental units. Applicants will be maintained in chronological order based on the established preferences described in this plan.

**Referral Methods**

***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):***

The City intends to use project or activity specific waiting lists as the referral method for HOME-ARP project and activities.

***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):***

The City does not intend to use the coordinated entry process established by the CoC.

***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):***

Not applicable.

***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):***

Not applicable.

**Limitations in a HOME-ARP rental housing or NCS project**

***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 City is not establishing a limitation in its HOME-ARP projects or activities to any particular qualifying population. The City’s HOME-ARP program will not exclude any eligible qualifying applicant from applying for or receiving assistance.

***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:***

Not applicable.

***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*)*:***

Not applicable.

# **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)](https://www.ecfr.gov/cgi-bin/text-idx?SID=273620a3dcadf1c5e247ef949a4fd87c&mc=true&node=se24.1.92_1206&rgn=div8). The guidelines must describe the conditions under with 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***

Not applicable, the City will not use HOME-ARP funds to refinance existing debt.

* ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.

# **Attachment A – Public Notice Ad – Palm Beach Post**

|  |  |
| --- | --- |
|   | A picture containing text, receipt  Description automatically generated |

# **Attachment B – Housing and Community Development Webpage**

<https://www.wpb.org/government/housing-community-development/reports>

# **Attachment C – Public Comments Received**

**TBD**

# **Attachment D – City Commission Approval**

**TBD**

# **Attachment E – SF-424 and Assurances**

# **Attachment F – Certifications**