



DECEMBER 2022

# HOME-ARP ALLOCATION PLAN -DRAFT-



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# ACKNOWLEDGEMENTS

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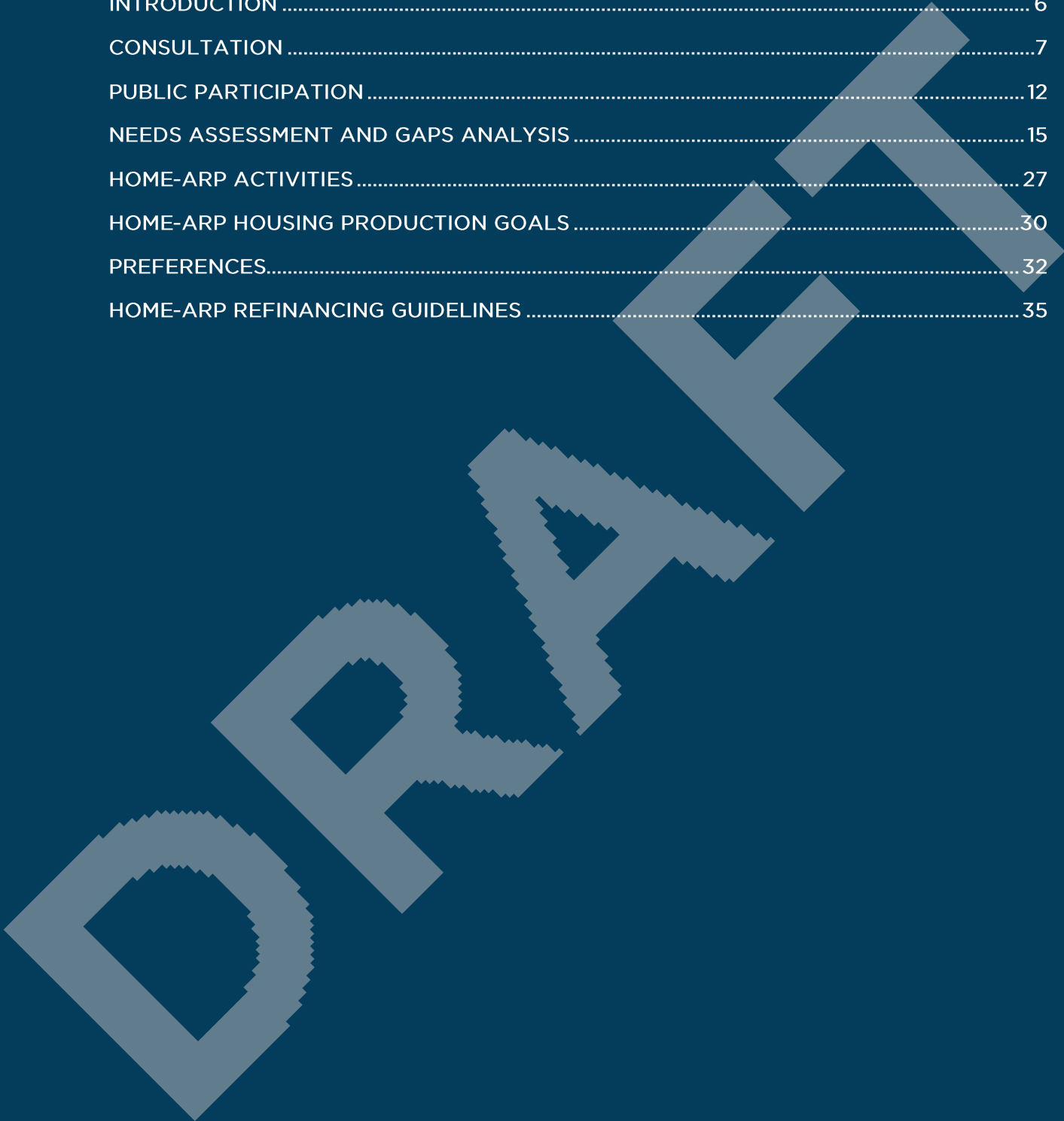
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# INTRODUCTION

The American Rescue Plan (ARP) was signed into law on March 11, 2021 and provides federal funding to relieve the continued impact of the COVID-19 pandemic on the economy, public health, state and local governments, individuals, and businesses. Within the ARP, Congress appropriated \$5 billion specifically to address the need for homelessness assistance and supportive services. Intended to be administered through HUD's existing HOME Investment Partnerships Act (HOME) Program, this allocation of ARP funds, known as HOME-ARP, must be used to perform four eligible activities that primarily benefit individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. The four eligible HOME-ARP activities include: (1) development and support of affordable housing; (2) tenant-based rental assistance (TBRA); (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units.

Orange County received an allocation of \$10,554,916 in HOME-ARP funds and has engaged in a consultation and public participation process to develop this HOME-ARP Allocation Plan. In this plan, the County outlines how it intends to distribute HOME-ARP funds locally, including how the funds will be used to address the needs of qualifying populations. In accordance with federal regulations and the guidance contained in Community Planning and Development Notice CPD-21-10, the plan will be submitted to HUD as a substantial amendment to the County's Fiscal Year 2021-2022 Annual Action Plan. HOME-ARP funds must be expended by September 30, 2030.

# CONSULTATION

Before developing this HOME-ARP Allocation Plan, the County consulted with a variety of agencies and service providers whose clientele include the HOME-ARP qualifying populations to identify unmet needs and gaps in housing or service delivery systems. Input from these providers was also used to determine the HOME-ARP eligible activities currently taking place within the County's jurisdiction and potential collaborations for administering the HOME-ARP Program.

At a minimum, the County is required by HUD guidance to consult with the Homeless Services Network of Central Florida, Inc. (as the local Continuum of Care) and other agencies specializing in services supporting HOME-ARP qualifying populations. The County consulted with the following agencies:

- homeless and domestic violence service providers,
- veterans' groups,
- the Orlando Housing Authority,
- Winter Park Housing Authority,
- the County's own Housing and Community Development Department (in its capacity as the County's public housing authority),
- 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. These consultations are summarized in the table that follows.

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

Orange County began its consultation process in November 2022 by identifying organizations and points of contact representing each of the required areas of consultation. Each of these contacts was sent an invitation to participate in a virtual focus group, an online questionnaire, or phone interview. Nearly all stakeholders contacted opted to join a focus group, however, in some cases, other staff from participating organizations also took part in a phone interview or completed a questionnaire. In each of these settings, participants were asked detailed questions specifically targeted to the types of input required for the HOME-ARP plan. A total of 26 stakeholders joined a focus group, and four questionnaires were returned. These responses formed the basis for determining the County's proposed HOME-ARP activities, uses of funds, and the composition of a first draft of the HOME-ARP plan.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Ability Housing	<ul style="list-style-type: none"> <li>• Services for People with Disabilities</li> </ul>	Focus Group	<ul style="list-style-type: none"> <li>• Quality multi-family rental housing targeted to low-income households and those at risk of homelessness is a great need.</li> <li>• Community housing for people with disabilities who have experienced homelessness has been helpful to keep this population stably housed.</li> <li>• Supportive services are needed to help residents overcome employment barriers and build financial management skills.</li> </ul>
Community Legal Services of Mid-Florida, Inc.	<ul style="list-style-type: none"> <li>• Fair Housing and Civil Rights Organization</li> </ul>	Focus Group and Phone Interview	<ul style="list-style-type: none"> <li>• The number one issue is housing affordability. In predominately minority neighborhoods, for people who are already financially vulnerable and struggling or on fixed incomes, rising housing costs and rising rents are having a disparate impact.</li> <li>• Affordable and accessible housing is also a big issue in the County. Florida has a large population of seniors with age-related disabilities.</li> </ul>
Harbor House of Central Florida, Inc.	<ul style="list-style-type: none"> <li>• Domestic Violence Service Provider</li> <li>• Homeless Service Provider</li> </ul>	Focus Group	<ul style="list-style-type: none"> <li>• Supportive services and physically safe bridge housing options for survivors of domestic violence are needs in Orange County.</li> <li>• The DV population needs to have resources that create financial support and helps people advance their career and become financially independent.</li> <li>• Supportive service for children are also needed.</li> </ul>
Homeless Services Network of Central Florida, Inc.	<ul style="list-style-type: none"> <li>• Continuum of Care</li> <li>• Veterans Services</li> </ul>	Focus Group	<ul style="list-style-type: none"> <li>• Veterans have a full course of options from homeless prevention, emergency shelter, rapid-rehousing, permanent housing for chronically homeless, and shallow subsidies to assist those in poverty.</li> <li>• A top need would be hotel conversions into extremely low- and low-income housing units.</li> <li>• Supportive service needs include community connections, access to disability income, and up-skilling.</li> </ul>



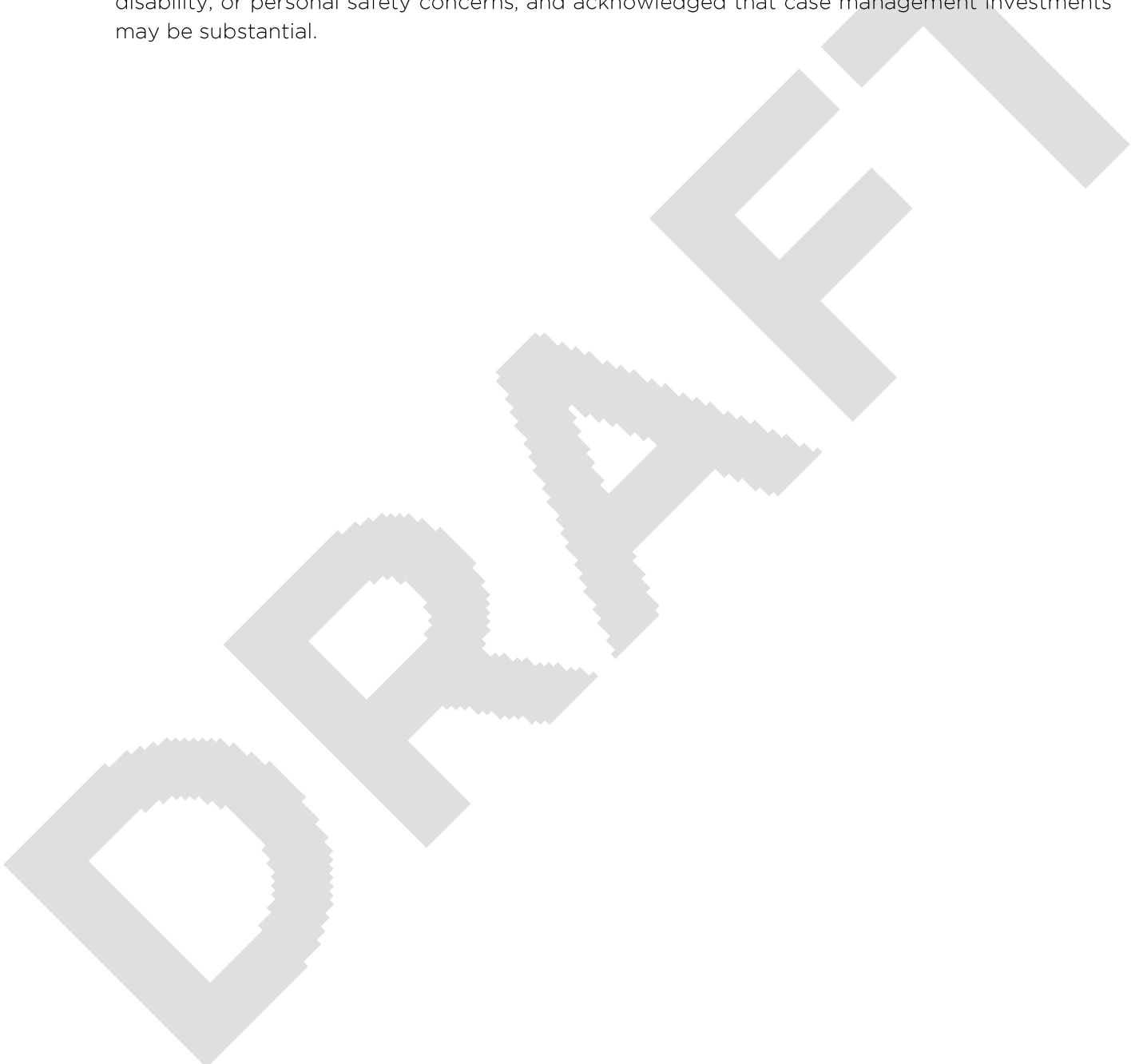
Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Orange County, Citizens Resource & Outreach Division	<ul style="list-style-type: none"> <li>• Homeless Service Provider</li> <li>• Veterans Services</li> </ul>	Focus Group	<ul style="list-style-type: none"> <li>• Learning how to find and take advantage of services and benefit programs is important.</li> <li>• Greater education on various forms of discrimination is needed so that people can more easily recognize when they are being discriminated against.</li> </ul>
Orange County, Housing and Community Development Division	<ul style="list-style-type: none"> <li>• Public Housing Authority</li> <li>• Public Agency Addressing the Needs of Qualifying Populations</li> </ul>	Focus Group	<ul style="list-style-type: none"> <li>• Expansion of the County's current voucher program may be a good use of HOME-ARP funds because the County already has the operational structure for the program in place, and the demand for vouchers is high.</li> <li>• Small-scale bridge housing options could also be helpful to provide greater options to people exiting shelters or assistance programs and for whom affordability of market rate housing will be an extreme challenge.</li> </ul>
Orange County, Mental Health and Homelessness Division	<ul style="list-style-type: none"> <li>• Public Agency Addressing the Needs of Qualifying Populations</li> <li>• Services for People with Disabilities</li> </ul>	Focus Group	<ul style="list-style-type: none"> <li>• The agency has observed a tremendous increase in homeless families with children due to rent increases.</li> <li>• Housing discrimination is a major problem among people with disabilities.</li> <li>• Vulnerable households need education and information in order to take advantage of available housing programs - many are too consumed with managing day-to-day struggles to seek opportunities.</li> </ul>
City of Orlando, Office of the Mayor (Community Trust and Equity Initiative)	<ul style="list-style-type: none"> <li>• Fair Housing and Civil Rights Organization</li> </ul>	Focus Group	<ul style="list-style-type: none"> <li>• Some residents have issues with LGBTQ discrimination and being asked too many invasive questions in the process of viewing a property or during conversation for rental.</li> </ul>

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Orlando Housing Authority	<ul style="list-style-type: none"> <li>Public Housing Authority</li> </ul>	Focus Group	<ul style="list-style-type: none"> <li>There is a need for more production of affordable rental housing.</li> <li>Make existing housing more affordable while we work on increasing the affordable housing supply.</li> <li>Incomes need to increase with rents; Orange County/Orlando is a desirable place to live yet there is a lack of jobs that pay wages to afford housing.</li> <li>There is a need for more housing for persons with disabilities, ADA accommodations, and handicap accessible units (i.e., lower cabinets, wide doors, turn radius).</li> <li>Homeowners have lost homes and belongings due to hurricanes Ian and Nicole and we do not have units to offer those impacted.</li> </ul>
The Salvation Army	<ul style="list-style-type: none"> <li>Homeless Service Provider</li> </ul>	Focus Group	<ul style="list-style-type: none"> <li>Bridge housing is needed across the region to assist all populations. When there is no inventory available for people transitioning from homelessness to job and housing security, they end up right back in the same emergency shelter programs.</li> <li>The outcomes cannot be successful if there is nowhere for them to transition to.</li> <li>Low-income affordable housing is the main need; supportive services are a significant need, as is non-congregate shelter.</li> </ul>

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

Stakeholders consulted during the HOME-ARP planning process articulated a clear need for increased affordable rental housing options targeted to low- and very low-income households. In combination with bridge housing to provide housing options to households exiting shelters or more intensive homelessness and/or domestic violence assistance programs, an expansion of the County’s housing inventory within this segment is a high priority need. While a variety of existing funding sources and programs are targeted to veterans experiencing homelessness, no other subpopulation has as comprehensive a set of housing and service options available to them. Additional tenant-based vouchers can help fill this need to a degree by subsidizing units in the market-rate inventory and making them affordable to low-income households. The County’s existing voucher programs indicate that staff has the knowledge and infrastructure needed to manage additional vouchers created with HOME-ARP funding.

In addition to the needs for expanded housing inventory and subsidies, stakeholders consulted frequently also described supportive service needs. Ranging from assistance for survivors of domestic violence in attaining financial independence, to programs that help increase employment skills and connect residents with information and education about the available services offered, to some complement of supportive services will be necessary to ensure the success of other HOME-ARP funded housing programs. Stakeholders described the intensive needs and vulnerability of HOME-ARP qualifying populations, often heightened due to age, disability, or personal safety concerns, and acknowledged that case management investments may be substantial.



# PUBLIC PARTICIPATION

Participating Jurisdictions (PJ) 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 no less than 15 calendar days. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold at least one public hearing during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public: a) the amount of HOME-ARP the PJ will receive, and b) the range of activities the PJ may undertake.

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

**Date of public notice:**

December 11, 2022

**Public comment period:**

Start date – December 12, 2022

End date – December 30, 2022

**Public hearing:**

December 14, 2022

**Describe the public participation process:**

*\*\*The HOME-ARP public participation process will consist of a public comment period and public hearing prior to the Board of County Commissioners considering adoption of the plan and prior to the plan’s submission to HUD. This portion of the plan will be updated with a summary of comments once the public participation process has concluded.\*\**

The County conducted a survey from May to July 2022 for members of the public to register their opinions and input on a variety of housing and community development topics, including homelessness and the use of HOME-ARP funding. Regarding homelessness in general, the highest needs identified by the survey respondents were homeless prevention, permanent housing, and transitional/supportive housing programs. Outreach to homeless persons and access to homeless shelters received the lowest *relative* prioritization among the homelessness needs, however, each of these was marked a high rather than low priority by a factor of more than 6 to 1. On a separate survey question, respondents were provided a list of the eligible uses of HOME-ARP funding and asked to rank them in priority order. The weighted averages (higher weighted averages equate to a higher relative priority) are depicted in the following chart.

This draft HOME-ARP Allocation Plan will be made available for public review and comment for a 19-day period beginning December 12 until December 30, 2022 via the Orange County HCD web page: <http://www.ocfl.net/NeighborsHousing/CommunityDevelopment.aspx>. The draft plan will also be made available for review during normal business hours at the offices of the Orange County Housing and Community Development Division (525 E. South Street, Orlando, FL 32801), and at the Orlando Public Library main branch (Community Relations Department, 3<sup>rd</sup> Floor, 101 E. Central Boulevard, Orlando, Florida 32801).

Additionally, a public hearing is required by the County's Citizen Participation Plan and U.S. Department of Housing and Urban Development (HUD) Regulations to receive public input prior to the plan being submitted for approval by the U.S. Department of Housing and Urban Development (HUD). The public hearing will be held on Wednesday, December 14, 2022 at 6:00 in the Largo Training Room located on the 1st Floor of the Orange County Internal Operations Centre I (450 E. South St, Orlando, Florida 32801). Representatives from the Orange County Housing and Community Development Division and the Community Development Advisory Board will conduct the Public Hearing to receive comments on the draft plan.

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

In preparing this HOME-ARP Allocation Plan, the County conducted public outreach to gather input from residents, the Continuum of Care, housing authorities, non-profit agencies, local service providers, County staff, other government agencies, and others. To involve members of the public in the Plan, the County conducted a community survey (available in English and Spanish, online and in hard copy). Hard copies of the survey were distributed by County staff at in-person neighborhood meetings and were made available at the Orange County Library in Downtown Orlando. The link to the web-based version of the survey was advertised through press releases and social media posts. The County's Communications Division assisted with the distribution and posting of these materials, sending the press release to over 250 contacts which included local TV and radio stations, community newspapers, Hispanic media, and ethnic newspapers and publications. The survey was available from May to July, 2022 and portions relevant to the HOME-ARP Allocation Plan received 70 responses.

In addition to the survey, the County will encourage participation by the public through advertising the 19-day public review and comment period running from December 12 to December 30, 2022 as well as the public hearing scheduled for December 14, 2022. Advertisement for the comment period and hearing will be published via a public notice in the *La Prensa* (Spanish) and *Orlando Sentinel* (English) on December 8 and December 11, 2022, respectively.

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

Before developing this HOME-ARP Allocation Plan, the County consulted widely with a variety of agencies and service providers whose clientele include the HOME-ARP qualifying populations. Consultations were achieved primarily through focus groups. The comments and recommendations received through these processes are summarized in the preceding "Consultation" section of this plan.

This section will be updated with a summary of comments received once the public participation process has concluded.

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

This section will be updated once the public participation process has concluded.

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# NEEDS ASSESSMENT AND GAPS ANALYSIS

This needs assessment and gaps analysis evaluates the size and demographic composition of all four of the HOME-ARP qualifying populations within Orange County and assesses the unmet needs of those populations. This analysis includes both gaps in the current supply of housing and shelter units as well as gaps within the services offered by the local network of homeless assistance organizations. A variety of data sources inform this analysis, including the County's recent 2022-2026 Consolidated Plan, the CoC's Point in Time (PIT) and housing inventory counts, and consultations with service providers.

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	74	--	61	--	0								
Transitional Housing	50	--	84	--	42								
Permanent Supportive Housing	0	--	160	--	0								
Other Permanent Housing	--	--	--	--	--								
Sheltered Homeless						650	657	--	--				
Unsheltered Homeless						0	224	--	--				
Current Gap										1,102 emergency, transitional, and permanent housing beds			

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

**Note:** Data is for Orange County with Orlando locations subtracted out to better reflect the grantee's HOME jurisdiction. Data from the 2022 Point-in-Time Count for Orange County was not broken down by other permanent housing, veterans, or victims of domestic violence.

### 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	129,589		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,311		
Rental Units Affordable to HH at 50% AMI (Other Populations)	8,017		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		17,160	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		14,414	
<b>Current Gap</b>			<b>31,574</b>

**Data Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS) Tables 2 & 8

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

#### Residents Experiencing Homelessness (as defined in 24 CFR 91.5)

The 2022 PIT count for the Orlando/Orange, Osceola, Seminole Counties CoC noted a total of 2,151 people experiencing homelessness, including 1,725 sheltered (80.2%) and 426 unsheltered (19.8%) people. Of the sheltered individuals, 1,233 were in emergency shelter (71.5%) and the remaining 492 were in transitional housing (28.5%). Of the 505 individuals counted under the age of 25, 12 were unsheltered (2.4%).

Within Orange County, the PIT count noted 1,531 people, or 1,075 households, experiencing homelessness. Of those, 650 people were in households with both adults and children (203 households, all of whom were sheltered in emergency or transitional housing). Of the 881 people in households with only adults (872 households), 224 were unsheltered, and 657 were sheltered in emergency shelter or transitional housing.

#### Residents At Risk of Homelessness (as defined in 24 CFR 91.5)

Overall, the most common housing problem in Orange County is cost burdens regardless of tenure type. Over two-thirds (69%) of all households with incomes under 80% HAMFI in the



county experience cost burdens. Severe cost burdens affect 19,415 owners and 32,086 renters in total comprising approximately 52% of all cost burdened households in Orange County. For the lowest income households (those with incomes under 30% HAMFI), severe cost burdens are most common, impacting nearly two-thirds (65%) of all households at that income level.

While the primary housing issue facing low- and moderate-income residents are related to affordability, there are other housing needs in the county. Approximately 3% of all households experience overcrowding and 2% of all households have no income. Less than 1% of all households reside in substandard housing or lack complete plumbing and kitchen facilities. Although these percentages are significantly smaller in comparison to households with cost burdens, the total number of households experiencing problems other than cost burdens amounts to 15,122 or about 5% of all households in the Orange County.

### Survivors of Domestic Violence

In 2020, 106,515 crimes of domestic violence were reported to Florida law enforcement agencies resulting in 63,217 arrests. Applying these figures to the Orange County population (outside of the city of Orlando), about 5,550 people in Orange County reported domestic violence in 2020.

The Centers for Disease Control estimates that about 6.2% of women and 5.1% of men in Florida have experienced any contact sexual violence, physical violence, or stalking by an intimate partner in the past 12 months, according to its National Intimate Partner and Sexual Violence Survey State Report released in 2017. Applying these figures to the Orange County population (outside of the city of Orlando), about 69,585 women and 57,329 men in Orange County have experienced any intimate partner violence in the past 12 months.

### Other Populations At Risk of Housing Instability:

#### Elderly and Frail Elderly

According to 2016-2020 American Community Survey estimates, about 12.4% of Orange County's population (outside of the city of Orlando) is elderly (aged 65 and over) and about 4.9% of the population is considered frail elderly (aged 75 and over). About 35.4% of individuals aged 65 and over have one or more disabilities (from ACS tables S0101 and S1810).

#### People with Disabilities

In Orange County, an estimated 152,126 people have a disability, representing 11.2% of the population, according to 2016-2020 American Community Survey estimates. Looking at data specifically for Orange County (outside of the city of Orlando), the disability rate is somewhat higher, 11.7%. People aged 18-64 years make up the largest share of the disabled population, representing over half (52.9%) of the population with disabilities and 6.1% of the total population in Orange County. By contrast, seniors (65+) make up 37.4% of the disabled population and 4.3% of the total population. Most common are ambulatory and cognitive difficulties, which impact 5.5% and 4.7% of the population, respectively. Hearing, vision, independent living, and self-care difficulties are less common, impacting about 2-4% of the population.

#### People with HIV/AIDS and their Families

According to AIDSvu, an interactive mapping tool from Emory University's Rollins School of Public Health, an estimated 757 out of every 100,000 people in Orange County were living with

HIV as of 2019. Further, 40 out of every 100,000 people living in the County were newly diagnosed with HIV in 2019.

### Persons with Substance Use Issues

The Central Florida region that includes Orange and Osceola counties had an estimated 4.2% rate of alcohol use disorder in the past year for individuals age 12 and older, according to 2016-2018 data from the U.S. Substance Abuse & Mental Health Data Archive (SAMHDA). In the past year, 2.0% of the region's population is estimated to have used cocaine and 0.3% to have used heroin, per the 2016-2018 data.

### **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:**

Orange County, excluding the City of Orlando, offers 171 public housing units located in the City of Winter Park and 205 public housing units offered by the Orlando Housing Authority. The Orange County Housing and Community Development Division also offers 1,263 Section 8 housing choice vouchers in the County. When the City of Orlando is included in these counts, Orange County offers a total of more than 4,000 housing choice vouchers. The Orlando Housing Authority offers 2,481 of these vouchers, which may be located both within the City of Orlando or in other locations in Orange County.

Orange County also offers short term COVID-19 related Emergency Rental Assistance, having recently opened a second phase of the successful program (ERA2) in October 2022. Rental assistance under this program is intended for residents who already have housing and are behind on rent. It also excludes residents of the City of Orlando as the city received separate emergency COVID-19 relief funding. While this assistance is vital to lower income residents who are struggling due to the pandemic, it is ineffective in helping unhoused or transitioning residents to acquire affordable housing.

The HUD LIHTC database indicates that there are 127 LIHTC developments in Orange County containing a total of 25,594 units. Of these units, 22,614 are dedicated low-income units. The vast majority of these developments exist within the City of Orlando; there are only 12 developments with a total of 2,194 units that exist within Orange County but outside of Orlando city limits. As of 2018, CHAS data showed that there were 32,430 rental households in Orange County with incomes below 30% HAMFI, and another 32,145 rental households with incomes below 50% HAMFI. This indicates that rental households needing affordable or subsidized housing far outnumber the number of units available through such programs.

Orange County Government invests significant general revenue dollars into programs and housing units, greatly enhancing the resources available to assist HOME-ARP qualifying populations. .

- The County used \$70,000 in general revenue funds for nine (9) units of bridge housing located on the Coalition for the Homeless of Central Florida, Inc. campus.
- Orange County also provided \$547,740 in funding to Grand Avenue Economic Community Development Corp. for 40 units of permanent supportive at the Maxwell

Terrace complex, \$865,000 in funding to Aspire Health Partners, Inc. for 30 units of transitional housing, and \$2.08M in funding to Homeless Services Network of Central Florida, Inc. to annually offer permanent supportive housing for 274 households.

- In addition to funding bridge housing, transitional housing, and permanent supportive housing units, the County allocates \$1.55M in general revenue funds annually for rapid re-housing of 127 homeless families (implemented by Homeless Services Network of Central Florida, Inc.), and \$872,000 for the Diversion Program implemented by the Coalition for the Homeless of Central Florida, Inc.
- The County also contributes \$150,000 to cover annual operational expenses at the Samaritan Resource Center, a daily drop-in center for homeless individuals located in East Orange County.
- The County awards SHIP dollars to the Coalition for the Homeless of Central Florida, Inc. for a rapid re-housing program, which is currently in its third year.

While most private and nonprofit sector facilities that serve homeless persons are located in the City of Orlando, they include the wider CoC jurisdiction as their service area and are able to serve residents of unincorporated Orange County, there are also several agencies that serve persons who are homeless in Orange County outside of the Orlando city limits. They include:

- Aspire Health Partners provides 84 transitional housing beds.
- Catholic Charities of Central Florida provides 34 rapid rehousing beds for families with children.
- Coalition for the Homeless of Central Florida provides 77 rapid rehousing beds for individual adults and families with children.
- Family Promise of Greater Orlando- Orange County provides 34 emergency shelter beds.
- Grand Avenue Economic Community Development Corp. provides 75 permanent supportive housing beds for chronically homeless adults.
- Harbor House of Central Florida provides 120 emergency shelter beds for individual adults and families with children who are victims of domestic violence.
- Homeless Services Network of Central Florida provides one emergency shelter bed through its isolation and recovery center.
- LifeStream Behavioral Health Center provides 50 transitional housing beds for families with children.
- Orange County Government provides 63 emergency shelter beds for individual adults through its Shelter Plus Care program.
- Samaritan Resource Center provides eight rapid rehousing beds for individual adults.
- Wayne Densch Center provides 22 permanent supportive housing beds for individual adults at risk of homelessness who are severely mentally ill, have an alcohol or drug addiction, or are dually diagnosed.

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

### Residents Experiencing Homelessness (as defined in 24 CFR 91.5)

Data from the PIT count indicates a high level of need for housing and services for people experiencing homelessness in the region. Community input received during the development of this Plan also supports the need for resources for people experiencing homelessness in Orange County. Focus group participants noted several priority homeless needs in Orange County, including:

- Rental housing targeted for deep affordability (to low- and very low-income households)
- Bridge housing and transitional housing options
- Community housing for people with disabilities
- Safe and supportive housing for survivors of domestic violence
- Job training and connections to jobs
- Addressing barriers to employment, including transportation and childcare
- Financial literacy programs
- Additional rental housing vouchers
- Mental health services
- Healthcare services
- Addressing root causes of homelessness
- Substance abuse programs
- Single-room occupancy housing

### Residents At Risk of Homelessness (as defined in 24 CFR 91.5)

Residents at-risk of homelessness typically live at or below the federal poverty level. High housing costs make it difficult for these populations to afford housing. Low incomes force many residents to live in congregate care, have roommates, or live with family. HUD's fair market rent documentation for FY 2022 estimates fair market rent for a two-bedroom unit in Orange County at \$1,422 per month, and for a three-bedroom unit at \$1,827 per month.

There is a need to increase the availability of affordable housing for very low-income, at-risk populations. This could include options such as smaller housing units; multifamily missing middle housing, including duplexes, triplexes, quadraplexes, and other small multifamily units; accessory dwelling units; cohousing with shared services; and other housing types that support increased levels of affordability.

Outreach to at-risk populations to ensure they are aware of available services is another need. Clarity in marketing and in public buildings about what services are available is important in supporting awareness of available services among vulnerable populations. Outreach also

includes the development of relationships and trust so that people feel comfortable seeking out needed services.

### Survivors of Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Survivors of domestic violence (including those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking) frequently face unique challenges related to housing and services. Stakeholders consulted as part of the development of this plan suggested that the need for physical safety in housing is more pronounced than with other qualifying populations. Additionally, supportive services to help survivors establish a base of financial support (through education, financial management, and/or career support) are important needs. Counseling and supportive services, particularly for children impacted by domestic violence, is another need.

### 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

Housing may be inaccessible to populations with special needs or requiring special services for a variety of reasons. Persons with disabilities may find that their housing options are not ADA compliant or are outside the service range for public transportation. People living with HIV/AIDS, immigrants and refugees, people with criminal histories, and other populations with special needs are often discriminated against in housing application processes. People living with HIV/AIDS have a particular need for low-barrier housing that is free from requirements surrounding drug testing, sobriety, criminal background, and medical appointments. For these reasons, there is a need to ensure that accessible, low-barrier housing is available and to take actions to reduce discrimination, such as providing fair housing services.

The elderly, people with disabilities, and others who may not have access to vehicles, often need housing that is accessible to transportation, recreation, and employment. These populations need housing options that are integrated into the community to provide access to needed services and to reduce social isolation. Like other populations with special needs, people living with HIV/AIDS also need housing that provides easy access to health services, resources, and employment.

Housing that is safe and clean is another need for people with special needs. Units that are not clean or have other unhealthy conditions can worsen health issues for people who are already vulnerable.

Combating stigmas is an important concern for people with special needs. For adults with criminal histories and people living with HIV/AIDS, discrimination may make accessing adequate housing difficult. Further, a lack of understanding regarding the transmission of HIV may cause people to lose housing or employment, thus increasing risk of homelessness.

Additional housing and service needs for these populations include:

### Transportation

Access to transportation is an important concern for people with special needs, yet gaps within the public transportation network result in uneven access to transit service across Orange County neighborhoods, particularly impacting low-income populations, persons with disabilities, and elderly populations. People with disabilities, the elderly, and others who may not have access to vehicles need housing close to transportation services to access employment, health services, and recreation opportunities. Persons with HIV/AIDS need housing nearby transportation services to access health services and other resources. If transit is not within walking distance, special needs populations require accessible, reliable transportation services to provide access to everyday needs. Stakeholders noted a need for improved transit reliability and better facilities at transit stops (i.e., benches or bus shelters). Some participants also identified transportation assistance as a key need for seniors in Orange County.

### Specialized Housing and Services

Specialized housing addresses needs of specific populations. People with physical, intellectual, or developmental disabilities; people living with HIV/AIDS; and people with alcohol or drug addiction have specific housing needs that may be addressed through housing with wraparound services, such as case management, life skills programming, and health services. The Housing First model emphasizes that supportive services should not be required for people to access housing. Case management was a key need identified by stakeholders related to reducing or preventing homelessness for many subpopulations.

### Workforce Development and Employment Services

Special needs populations may also need workforce development and employment services. These programs may include employment navigation, job training, education, transportation services, and case management focused on employment, among others.

### Physical and Mental Healthcare Access

Access to healthcare is a need for special needs populations, as they are more likely to experience barriers such as economic disadvantage; medical issues and disability; language and literacy; age; and cultural, geographic, or social isolation. To increase access to healthcare, it is important for local governments and stakeholders to take steps to define, locate, and reach at-risk populations.

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

The centralized, professionally managed Homeless Management Information System (HMIS), data-driven Coordinated Entry System, and the Housing First approach implemented by the Central Florida region's Continuum of Care and assisted by Orange County ESG funding have resulted in an extremely effective and well-coordinated effort to end homelessness. With the Homeless Services Network of Central Florida serving as the Continuum of Care's lead agency, Central Florida has attracted significant federal, state, and local funding to support its regional plan to end homelessness. By shifting focus from an earlier "housing-readiness" model to a data-

driven, best-practice “housing first” model, the CoC offers interventions that provide housing as the first step in ending homelessness, supported by wrap-around services to help vulnerable residents retain housing.

While this institutional delivery system is generally strong, there are also gaps and opportunities for improvement. In 2017, the Homeless Services Network of Central Florida conducted a review of the gaps, opportunities, and challenges facing the Central Florida Continuum of Care.<sup>1</sup> After considering each of the various stages a homeless person or household passes through between becoming homeless and returning to stable housing, the Continuum distilled its three highest priority expansion needs in order to better meet gaps in services. The three highest priority needs, as described in the HSN document, are listed below:<sup>2</sup>

- **Permanent Supportive Housing for Non-Chronic Families:** Current resources are limited to providing Permanent Supportive Housing to households that have been homeless for at least a year. Given the vulnerability that children experience during homeless episodes, the CoC has prioritized identifying resources that will provide permanent subsidy and wrap around services to families unable to stabilize with the time limited supports provided through the region’s rapid rehousing projects.
- **Diversion:** Diversion projects have been successful in assisting families who need very limited financial and/or services supports to regain access to stable permanent housing. Diversion projects that target these families are able to cost-effectively redirect newly homeless households back into permanent housing while limiting their involvement in the homeless services system.
- **Extended Engagement:** Individuals who have mental health and/or cognitive impairments may be severely limited in their ability to engage any system of care or support. Most, if not all, of these individuals are eligible for current resources that would provide housing subsidy and wrap around services, while others would qualify for higher levels of care including Adult Living Facilities. Intentional effort at creative forms of outreach is required to effectively engage these highly vulnerable neighbors.

**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:**

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

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<sup>1</sup> Homeless Services Network of Central Florida. *Continuum of Care (CoC) Plan: Gaps, Opportunities and Challenges*, 2017.

<sup>2</sup> Homeless Services Network of Central Florida. *Continuum of Care (CoC) Plan: Gaps, Opportunities and Challenges*, 2017.

1. **Cost burden:** A household has a cost burden if its monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
2. **Overcrowding:** A household is overcrowded if there is more than 1 person per room, not including kitchens and bathrooms.
3. **Lack of complete kitchen facilities:** A household lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, refrigerator, or a sink with piped water.
4. **Lack of complete plumbing facilities:** A household lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

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

A total of 107,793 households, approximately one-third of all households in Orange County, experience one of the listed housing problems. For both renters and homeowners in Orange County, cost burden is the most common housing problem faced, affecting 69% of all households with incomes under 80% AMI. Data for households experiencing severe housing problems show nearly one-fifth of all households (60,661 households) experience one or more severe housing problems listed. The County's lowest income households (those under 30% AMI) experience these severe housing problems most acutely, with 65% being severely cost burdened, that is, spending more than half their incomes on housing costs.

While the primary housing issue facing low- and moderate-income residents are related to affordability, there are other housing needs in the County. Approximately 3% of all households experience overcrowding and 2% of all households have no income. Less than 1% of all households reside in substandard housing or lack complete plumbing and kitchen facilities. Although these percentages are significantly smaller in comparison to households with cost burdens, the total number of households experiencing problems other than cost burdens amounts to 15,122 or about 5% of all households in the Orange County.

Residents with special needs often live at or below the federal poverty level. High housing costs make it difficult for these populations to afford housing. Low incomes force many residents to live in congregate care, have roommates, or live with family. HUD's fair market rent documentation for FY 2022 estimates fair market rent for a two-bedroom unit in Orange County at \$1,422 per month, and for a three-bedroom unit at \$1,827 per month.

There is a need to increase the availability of affordable housing for populations with special needs. This could include options such as smaller housing units; multifamily missing middle housing, including duplexes, triplexes, quadraplexes, and other small multifamily units; accessory dwelling units; cohousing with shared services; and other housing types that support increased levels of affordability.

Housing may be inaccessible to populations with special needs for a variety of reasons. Persons with disabilities may find that their housing options are not ADA compliant or are outside the service range for public transportation. People living with HIV/AIDS, immigrants and refugees,



people with criminal histories, and other populations with special needs are often discriminated against in housing application processes. People living with HIV/AIDS have a particular need for low-barrier housing that is free from requirements surrounding drug testing, sobriety, criminal background, and medical appointments. For these reasons, there is a need to ensure that accessible, low-barrier housing is available and to take actions to reduce discrimination, such as providing fair housing services.

The elderly, people with disabilities, and others who may not have access to vehicles, often need housing that is accessible to transportation, recreation, and employment. These populations need housing options that are integrated into the community to provide access to needed services and to reduce social isolation. Like other populations with special needs, people living with HIV/AIDS also need housing that provides easy access to health services, resources, and employment.

Housing that is safe and clean is another need for people with special needs. Units that are not clean or have other unhealthy conditions can worsen health issues for people who are already vulnerable.

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

Priority needs for qualifying populations include:

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

### **Explain how the 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 shelter and housing inventory were determined using the Homeless Needs Inventory and Housing Need Inventory tables, information in the County's 2022-2026 Consolidated Plan, and consultation with housing and service providers.

Data from the 2022 Point-in-Time and Housing Inventory counts indicates that there were 1,531 people experiencing homelessness in Orange County and just 429 emergency, transitional, and permanent housing beds available, indicating a gap of 1,102 emergency shelter, transitional housing, and permanent supportive housing beds.

The Housing Needs Inventory indicates that 31,574 renter households with incomes of 50% AMI and below have severe housing problems, which may include lacking kitchen or complete plumbing, severe overcrowding, or severe cost burden.

The gaps in the service delivery system were determined through focus groups with housing and service providers, stakeholder interviews, and public meetings conducted during the HOME-

ARP and 2022-2026 Consolidated Plan community engagement processes. Needs were also determined through the Homeless Services Network of Central Florida's review of the gaps, opportunities, and challenges facing the Central Florida Continuum of Care.

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# HOME-ARP ACTIVITIES

**Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:**

For uses of HOME-ARP funding that will rely on subrecipients or contractors for implementation (as is the case for affordable housing development and delivery of supportive services), Orange County will select partners using its established Request for Applications (RFA) and Request for Proposals (RFP) processes. Where possible, these RFA and RFP processes will be conducted in conjunction with the standing Annual Action Plan cycles where an RFA and/or RFP can be issued to solicit applications for HOME-ARP funding opportunities as well as other CDBG and HOME proposals at the same time.

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

The County will administer its HOME-ARP funds directly, maintaining responsibility for project selection, and compliance with all HOME-ARP guidelines.

**If any portion of the PJ’s HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ’s entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ’s HOME-ARP program:**

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

Use of HOME-ARP Funding

Funding Category	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 1,000,000		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 5,000,000		
Development of Affordable Rental Housing	\$ 3,000,000		
Non-Profit Operating	\$ 0	0%	5%
Non-Profit Capacity Building	\$ 0	0%	5%
Administration and Planning	\$ 1,554,916	15%	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 10,554,916</b>		

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

Having engaged members of the public; conducted consultations with the local Continuum of Care and other professional stakeholders knowledgeable of the County's needs related to HOME-ARP qualifying populations; and also analyzed data on housing and shelter gaps affecting these populations; the County proposes to allocate its HOME-ARP funding to the following activities:

1. **Tenant Based Rental Assistance (TBRA)** – The County's allocation of funds to TBRA will provide voucher assistance to 60-70 households annually over the course of the grant period (i.e., through 2030). The Division of Housing and Community Development operates its own Public Housing Agency (FL-093) within Orange County. This unique organizational structure provides an advantage for the rapid implementation of a TBRA Program. Housing vouchers offer a stable and feasible long-term strategy for persons experiencing homelessness or at high risk of being homeless.
2. **Affordable Rental Housing** – Through local Housing Trust Fund dollars, state SHIP funding, and other sources, the County has access to significant sources of leverage that will allow it to efficiently create 25-30 new permanent affordable rental units with a HOME-ARP investment of approximately \$80,000 per unit. Existing RFP and RFA systems will provide a means for the County to solicit development partners and execute on these opportunities once they are identified. The County's HOME-ARP allocation remains available into 2030, so pursuit of this strategy may wait for stabilization in the housing market and in construction costs.
3. **Supportive Services** – The County has identified the need for supportive services through its focus group meetings with community partners and stakeholders. Approximately 500 households will be served annually through HOME-ARP funded one-on-one housing counseling and placements, budget counseling and financial education, and potentially, career counseling. The County will use its Annual Action Plan RFA process for soliciting applications for such services.

In addition to these three programmatic uses of HOME-ARP, the County will retain approximately 15% of its grant (\$1,554,916) to fund the costs and planning and administration of the HOME-ARP activities. The primary administrative expense is expected to be for the hiring of additional case managers to assist with the increase in TBRA vouchers offered.

## 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 County plans to use the largest share of its HOME-ARP funding to expand the number of Tenant Based Rental Assistance (TBRA) vouchers. The general unaffordability of housing for low-income households, and the instability faced by households living with severe cost burdens can be significantly alleviated through the use of vouchers. Households receiving voucher assistance will be better able to access housing of their choice without spending more than they

can afford. Despite the community's ongoing need for transitional housing or non-congregate shelter units, the County's unique position as a voucher administering agency positions it to make optimal use of additional TBRA vouchers using its existing administrative infrastructure and capacity. Additionally, development of non-congregate shelter under the HOME-ARP program is complicated by the fact that the operational and personnel costs associated with the management of non-congregate shelter units must be funded by other sources and funding for those types of expenses is scarce. The availability of additional housing vouchers, in addition to supportive services that can lead to economic self-sufficiency, is a more feasible approach to solving the housing needs of vulnerable populations in a timely manner.

Further addressing the high priority need for more affordable housing units in the County, the allocation of \$3,000,000 for development of new permanent affordable rental units will add to the County's inventory of quality affordable rental options. For the 31,574 Orange County households with incomes under 50% AMI who live with severe housing problems, these new rental units will help address their housing quality and affordability issues.

Finally, it is important to note the degree to which consultation with local stakeholders suggested a need for supportive services in addition to the creation of new housing units and vouchers. Not only will the County use a substantial portion of its administrative funds from the HOME-ARP grant to hire new case managers to assist voucher holders with the complex and interconnected support needs they frequently have, but the allocation of another \$1,000,000 from the available funding for services such as housing counseling, budget counseling, financial education, and career counseling responds to a clear and well-documented need arising from local conversations with service providers.

# HOME-ARP HOUSING PRODUCTION GOALS

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

Through its HOME-ARP investments, Orange County expects to create 25-30 new permanent affordable rental units, with an approximate per-unit HOME-ARP subsidy of \$80,000 apiece. Additional funding may be leveraged from the County's Housing Trust Fund and/or SHIP funding from the state in order to realize development of these housing units. In addition to these new units to be developed, the County will support another 60-70 households annually with tenant-based voucher assistance. Over the approximately 8-year grant period, these vouchers are estimated to support the affordability of 500 rental housing units for the households of HOME-ARP qualifying populations.

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

According to the most recent Comprehensive Housing Affordability Strategy (CHAS) data, there are 31,574 very low-income renter households (below 50% AMI) that experience a severe housing problem; for many of them, that problem is a severe cost burden wherein they are spending more than half their income on housing costs. Analysis of the data by tenure reveals that renters are more likely to be affected (32,086 renters below 50% AMI are severely cost burdened), but that severe cost burden affects a substantial number of homeowners as well (19,415 owners affected). Many of these severely cost burdened homeowners may be seniors who own their homes but whose incomes have declined in retirement.

Additional housing issues that may contribute to a residents' risk of becoming homeless or otherwise experiencing housing instability are being extremely low-income (earning 30% or less of AMI) and/or living in substandard or overcrowded housing conditions.

By adding 25-30 new permanent affordable rental units and simultaneously providing voucher assistance to 60-70 additional households each year, the County's HOME-ARP funds begin closing the estimated gap of 31,574 rental units affordable at 50% AMI. Providing housing of this type prevents at-risk families in unstable housing situations from becoming homeless, and thus preserves available emergency shelter and transitional housing options for the homeless households who most need them.

Data from the 2022 Point-in-Time Count combined with the CoC's most recent Housing Inventory Count indicates a gap of 1,102 emergency, transitional, and permanent housing beds needed to fully serve the Orange County population in need of such housing. Given limitations on the County's ability to add new non-congregate shelter units due to real estate availability and the scarcity of outside funding for staffing and operations, an alternative strategy is to provide expanded access to longer-term and permanent affordable housing options. Through

60-70 additional HOME-ARP funded vouchers and 25-30 new affordable rental units, the County will be increasing the capacity to stably house residents who are able to exit shelter programs but for whom there are no available, affordable housing options. Many stakeholders described their organizations' difficulties with this transition and how it can leave residents occupying needed shelter beds only because more independent housing options are not available. Thus the County's strategy of focusing on generalized affordable housing inventory should have a trickle-down effect and allow the existing inventory of emergency housing options to serve more of the residents most in need of basic emergency shelter.

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# 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:**

Based on consultation with community partners and stakeholders, public feedback/outreach received by Housing and Community Development Division, and review of other regional plans and strategies, Orange County proposes to provide a preference to each of the following subpopulations:

- Elderly and/or persons with disabilities who are homeless or at risk of being homeless
- Victims of human trafficking and domestic violence
- Cost burdened Large Families with 5+ members in the household

It should be noted that all of the qualifying populations described in HUD's HOME-ARP guidance will be eligible to be served in one or more of the County's HOME-ARP funded activities; these preferences do not limit eligibility but only indicate how applicants will be prioritized for access to housing, vouchers, and supportive services. Applications from any person meeting any of the qualifying population definitions will be reviewed for eligibility. Eligible applicants meeting one or more of the preference conditions listed above will receive priority placement on any waiting lists established for HOME-ARP funded rental housing or vouchers.

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

## **If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:**

The County established the above preferences to ensure that the unique funding and characteristics of the HOME-ARP program are implemented to maximum effect within the community. In making those determinations, the County consulted with stakeholders and considered public input. That information paired with data on rates of disability, unique housing challenges faced by elderly residents and large families, and the specific housing types and features needed to safely house survivors of human trafficking and domestic violence, has informed the list of preferences. Each of these populations experiences particularly acute and/or dangerous housing issues when unable to access stable housing.



For example, elderly and/or disabled residents who experience homelessness are uniquely vulnerable to serious health impacts. Therefore, keeping these exceptionally vulnerable populations securely housed or helping them successfully transition out of emergency housing protects the individual residents' health and access to care and treatment resources while also preserving case management and supportive service resources for other populations often requiring less intensive housing interventions.

Survivors of domestic violence and people who have experienced human trafficking are given a preference because of the importance of getting these populations into secure housing where they are safe from abusers and not compelled to return to unsafe housing situations. This population requires specialized supportive services, often focusing on financial independence and employment access. A strong network of existing providers is able to provide for these supports but have indicated a primary need is for safe community housing for these residents to live after exiting short-term programs.

A great deal of qualitative input suggests the difficulty in finding affordable housing in Orange County. That need is compounded for large families consisting of 5+ members of the household. The numbers of 4-bedroom rentals are exceedingly low and, when available, are rarely affordable to low-income households. Providing a preference to large families will give them a better opportunity to find and afford appropriate housing.

**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:**

To be determined.

**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:**

To be determined.

**If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE:**

To be determined.

**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:**

To be determined.

**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:**

Not applicable. Orange County will not limit eligibility for any of its HOME-ARP funded rental housing to a particular qualifying population or specific subpopulation.

**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. Orange County will not limit eligibility for any of its HOME-ARP funded rental housing to a particular qualifying population or specific subpopulation.

**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. Orange County will not limit eligibility for any of its HOME-ARP funded rental housing to a particular qualifying population or specific subpopulation.

# HOME-ARP REFINANCING GUIDELINES

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HUD guidance in CPD Notice 21-10 allows for the conditional use of HOME-ARP funding to refinance existing debt secured by multifamily rental housing when that housing will be rehabilitated with HOME-ARP funds. Jurisdictions intending to use funds in this way are required to include in their HOME-ARP Allocation Plans guidelines describing the conditions under which a refinance of existing debt will be considered. In addition to adhering to 24 CFR 92.206(b), a jurisdiction's refinancing guidelines must:

- Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity.
- Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.
- State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
- Specify the required compliance period, whether it is the minimum 15 years or longer.
- State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

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