

# HOME - ARP ALLOCATION PLAN

County of Henrico, Virginia  
Department of Community  
Revitalization

Draft for Public Review  
and Comment

February 4, 2023





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# Acknowledgements

The HOME-ARP Allocation Plan was prepared by the County of Henrico Department of Community Revitalization, Division of Community Development.

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# Preface

The "HOME -ARP Allocation Plan" is submitted electronically to the United States Department of Housing and Urban Development (HUD) through the e-Con Planning Suite within the Integrated Disbursement and Information System (IDIS). This document is an exported and reformatted version of that submission. Questions about this document may be directed to the Henrico County Department of Community Revitalization in the following manner:

- In person during normal office hours at 4905 Dickens Road, Suite 200. The ability to visit the office in-person may be limited if public safety or health conditions warrant.
- By e-mail at [revtialization@henrico.us](mailto:revtialization@henrico.us)
- By telephone at 804-501-4757

County of Henrico  
Department of Community Revitalization  
February 2023

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## Introduction

The American Rescue Plan Act of 2021 created a special allocation of \$5 billion to support state and local programs for populations experiencing homelessness or identified as at-risk of homelessness. This special allocation is administered by the U.S. Department of Housing and Urban Development (HUD) through the HOME Investment Partnerships Program, with the primary goal being to assist four “qualifying populations” through four types of eligible activities. Qualifying populations include those experiencing homelessness, those at-risk of homelessness, domestic violence survivors, and “other” populations not traditionally included in those definitions such as veterans and young adults.

Eligible activities that can be funded with HOME-ARP 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 (NCS). Recipients of HOME-ARP funds, known as Participating Jurisdictions (PJs), may use up to 10% of the award for Nonprofit Operating and Capacity Building Assistance and 15% of the award for Administration and Planning.

The County of Henrico, Virginia, received an allocation of \$3,216,865 in HOME-ARP funds to pursue projects that fall within the four eligible activities listed above. To receive this allocation, Henrico County, as a Participating Jurisdiction (PJ), must submit a HOME-ARP Allocation plan to HUD as a substantial amendment to the Program Year 2021-22 Annual Action Plan for approval by March 31, 2023. The Allocation Plan must describe the intended distribution of HOME-ARP funds, including how these funds will be used to address the needs of the HOME-ARP qualifying populations (QPs). The Allocation Plan must include the following:

- A summary of the consultation process and results of upfront consultation with community stakeholders and those working with the qualifying populations;
- A summary of comments received through the public participation process and a summary of any comments or recommendations not accepted and the reasons why;
- A description of HOME-ARP qualifying populations within the jurisdiction;
- A needs assessment and an analysis of gaps in housing and shelter inventory, homeless assistance and services, and the homelessness prevention service delivery system;
- A summary of the planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations;
- An estimated number of housing units for qualifying populations the PJ will produce or preserve with its HOME-ARP allocation; and
- A description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population.

With an understanding that homelessness and housing instability **are** regional issues that require jurisdictional cooperation and communication, the Counties of Henrico and Chesterfield and the City of Richmond contracted with the Corporation for Supportive Housing to undertake

the required consultation process, needs assessment and gaps analysis, and provide recommendations for the use of HOME-ARP funds with a regional framework in mind. All three localities will submit separate Allocation Plans to HUD for approval.

This document was created to meet the requirements detailed by HUD in CPD Notice 21-10 *Requirements of the Use of Funds in the HOME-American Rescue Plan Program* (the Notice) and Notice 22-13 *Revisions to HOME-ARP Allocation Plan Requirements and Final Submission Deadline for all HOME-ARP Allocation Plans*. The HUD approved template was used as a basis for the information detailed in this document with moderate adjustments for readability.

The HOME-ARP Allocation Plan will be considered by the Henrico County Board of Supervisors on March 14, 2023, for approval for submission of the Allocation Plan to HUD. The Resolution and public meeting minutes will be attached to the document as Appendix A and B, respectively, before submission and publication of the final document.

## Public Participation

- ***Date(s) of public notice:*** February 4, 2023
- ***Public comment period:*** *start date* - February 4, 2023. *end date* - March 6, 2023
- ***Date(s) of public hearing:*** February 16, 2023

The public comment period started on February 4, 2023, with an advertisement posted in the Richmond Times Dispatch, and the Henrico Citizen and the Richmond Free Press ran the advertisement on February 9, 2023 (Appendix C). The ad was also published on Henrico County's Facebook and Twitter pages on February 3, 2023. This comment period will run until March 6, 2023, and the advertisement included instructions on how to comment on the draft Allocation Plan through calls, emails, physical mail, online form submissions, and speaking to members of the Department of Community Revitalization.

The advertisement provided details about the date, location, and time of the public hearing and how to request disability accommodations or language accommodations. This public hearing will be held on February 16, 2023, at the Fairfield Library (1401 N Laburnum Ave, Richmond, VA 23223) from 6:00 PM to 8:00 PM. Accommodations have been made in the event of inclement weather to move to a virtual based platform. A presentation will be made by staff from the Henrico County Department of Community Revitalization along with the minutes of that public hearing will be attached as Appendix D to the plan upon submission to HUD and publication of the final document.

### Efforts to Broaden Public Participation

The draft HOME-ARP Allocation Plan was published on the Henrico County Department of Community Revitalization Webpage, and a copy of the Allocation Plan will be made available at the office of the Department of Community Revitalization. Notice of the public hearing and public comment period was published in three newspapers and links to the draft HOME-ARP Allocation Plan and online comment submission form were posted on the County's Facebook and Twitter.

Accommodations for persons with disabilities and those with limited English proficiency are also available for both the draft HOME-ARP Allocation Plan and the public hearing upon request.

*Accommodations for the public hearing should be made to the Department of Community Revitalization within three (3) business days of the public hearing (by February 12, 2023). Requests can be made by calling (804) 501-7640 or emailing [revitalization@henrico.us](mailto:revitalization@henrico.us).*

### Summary of Comments and Recommendations Received

This section will be completed once the public comment period ends.



## Summary of Comments and Recommendations Not Accepted

This section will be completed once the public comment period ends.

## Consultation

The County of Henrico, in partnership with Chesterfield County and the City of Richmond, contracted with the Corporation for Supportive Housing (CSH) to undertake the required stakeholder consultation process. In accordance with Section V.A of the Notice (page 13), at a minimum, a PJ must consult with:

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

The process involved CSH consulting with the required organizations through listening-sessions, stakeholder interviews, and a survey. CSH hosted four listening-sessions and eight key informant interviews. At each session and interview, CSH staff provided an overview of HOME-ARP funds, the qualified populations the funds are required to serve and the eligible activities under the HOME-ARP regulation.

The stakeholder listening-sessions targeted homeless services providers, community partners, and persons with lived experience. The key informant interviews included agencies that work directly with one or more of the qualified populations (QPs) and were conducted to glean more in-depth insights into the needs of the community and the strategies best suited to meet those needs.

The following stakeholder listening sessions were completed by CSH:

1. Homelessness Providers (Virtual meeting on December 1, 2022)
2. Community Partners (Virtual meeting on December 1, 2022)
3. Persons with Lived Experience (In-person week of December 12, 2022, at the single-men's shelter)
4. Persons with Lived Experience In-person week of December 12, 2022, at the women and families shelter)

The following key stakeholder interviews were completed by CSH:

1. Greater Richmond Continuum of Care on July 1, 2022, and December 27, 2022
2. YWCA - EmpowerNet (domestic violence service provider) on July 12, 2022
3. Partnership for Housing Affordability (agency that address the needs of QPs) on July 15, 2022
4. Chesterfield Department of Social Services (agency that addresses the needs of QPs) on August 19, 2022

5. Regional Community Services Boards: Henrico CSB, Chesterfield CSB, Richmond Behavioral Health Authority (organizations that address fair housing, civil rights, and the needs of persons with disabilities) on January 4, 2023
6. State Housing Services: Virginia Department of Housing and Community Development (public agency that addresses needs of QPs), Virginia Department of Behavioral Health and Developmental Services (public agency that addresses needs of QPs), and Virginia Housing (PHA) on January 4, 2023
7. Henrico Department of Social Services (agency that addresses the needs of QPs) on January 9, 2023.
8. Richmond Redevelopment Housing Authority (PHA) on January 11, 2023

CSH developed a short survey for service providers that did not have an opportunity to participate in a session and/or for service providers that did participate in a session or interview but had additional input to provide. CSH received a total of 9 responses from 8 different agencies and one community member. The following is a summary of the survey responses:

- Eight responses identifying the need for available affordable housing/permanent supportive housing as the priority need for the region.
- Coordination between service providers, local government, and funders is an important step in increasing the effectiveness of serving the qualifying populations.
- Co-locating healthcare, support services, and housing should be a priority when looking into a model for housing development.
- Funding for capacity building and staff operations is a need to ensure that as providers take on more projects that they can maintain them with trained staff.
- There is not enough housing to utilize rental assistance such as tenant-based rental assistance or vouchers.
- “Criminal justice impacted people are disproportionately represented among the homeless population. Resources must go to the lowest segment of the housing stability continuum; it's a matter of racial justice. I know housing affects virtually all working-class people these days, but our solutions must be equitable and not sacrifice the most disadvantaged populations (e.g., homeless, incarcerated) who have the least voice in the political process [at] large.”

Henrico County staff also met with four different service providers for one-on-one discussions regarding the use of these funds including Henrico Mental Health and Development Services (11/21/2022), Henrico Department of Social Services (11/30/2022), Richmond YWCA (11/17/2022), and Virginia Supportive Housing (11/18/2022). The responses from these meetings are found within Table 1. A list of all organizations contacted for consultation, method of contact, and date of contact is included in Appendix E.

## Summary of the Consultation Findings

The primary gap these consultations identified is the critical need for deeply affordable units in the region. Providers made it clear that without affordable units available for QPs, the current system cannot prevent or break the cycle of chronic homelessness. Additionally, once deeply

affordable units are developed, intense supportive services will be needed to ensure the households served by these units are stabilized and that they build the necessary skills to ensure they can remain stable without case management or financial assistance. Specific populations pulled out of these discussions include single parents with children, persons with mental disabilities or illnesses, and persons that have barriers to getting the traditional documentation needed (e.g., SSN, birth certificate, insurance) needed to obtain housing or services.

Other major gaps that were identified in these consultations included the need for nonprofit capacity building to address staffing concerns, need for an increase in shelter beds, and a distinct call for more partnerships between localities, state partners, and nonprofit organizations to best utilize the current systems to assist the qualifying populations. Vouchers were a common topic of discussion during the consultation process, and how they could be leveraged in a way that best serves the community through the use of project-based vouchers.

The term “flexible funding” was another common theme throughout the stakeholder listening sessions, and an unmet need was expressed that there needs to be a funding source that allows for service providers to pull from the funds for multiple types of services such as childcare, GED testing, healthcare, and general housing related costs (rental arrears, utility payments, security deposits, etc.). Stakeholders discussed the difficulties of not having a general fund that could be pulled from for any number of supportive services based on a household-by-household basis. There was discontent that many funding sources put too many barriers to funding which makes it difficult to service these households that need stabilization, as most funding sources prescribe a specific amount of funding for a specific type of service instead of a larger sum of funding that has a list of services that it could be used for.

Table 1 below lists all major points made during the consultation process by organization.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Homeward/ Greater Richmond Continuum of Care	Continuum of Care	<ul style="list-style-type: none"> <li>• Listening Session (homeless service providers)</li> <li>• Survey</li> <li>• Two Key Stakeholder Interviews</li> </ul>	<ul style="list-style-type: none"> <li>• Affordable housing units for all QPs, are the biggest need and barrier that providers are running into. All providers are struggling to find affordable housing.</li> <li>• Coordinated Entry will be the best way to handle referrals, since there is already staff trained on the system, an infrastructure in place, and a process that is familiar to staff and clients.</li> <li>• Permanent supportive housing with wrap around supportive services will make the greatest impact in the current situation seen by the Greater Richmond area. Chronic homelessness cannot be adequately addressed without having a safe, affordable place to house people as they receive the services they need.</li> </ul>
Richmond Redevelopment Housing Authority	Public Housing Agency	<ul style="list-style-type: none"> <li>• Key Stakeholder Interview</li> </ul>	<ul style="list-style-type: none"> <li>• The number of vouchers that have been awarded for the region is not nearly enough to address the overwhelming need in the region.</li> <li>• Not enough inventory available to place families, so even when the nonprofits in the area are able to assist in getting funding together for a household there is not enough housing stock to place them.</li> <li>• RRHA is no longer allowed to lease vouchers within 25 miles from their office and must stay within the City of Richmond’s borders, which effectively cuts off Henrico and Chesterfield as options for them to house in-need populations.</li> <li>• The passing off of vouchers and services due to the jurisdictional boundaries caused undue stress and confusion on the households being served.</li> <li>• Criminal background checks and lack of identification (SSNs) are two large barriers to many households on the waitlists.</li> <li>• There are over 10,000 households on the one bedroom waiting list.</li> </ul>

			<ul style="list-style-type: none"> <li>• There are approximately 4,800 households on the two-bedroom waitlist.</li> <li>• There are approximately 4,100 households on the housing choice voucher waitlist.</li> <li>• Over all 22 waitlists, there are other 100,000 households waiting to be served.</li> <li>• Due to the overwhelming number of households on the waitlists, they were closed in April 2022.</li> <li>• “You can’t just have one or the other [shelter beds and permanent supportive housing] I mean we need to attack this from all fronts you know because people need help in the immediate as much as they need help with the long term.”</li> </ul>
Chesterfield Department of Social Services	Public Agency that addresses QP needs	<ul style="list-style-type: none"> <li>• Key Stakeholder Interview</li> </ul>	<ul style="list-style-type: none"> <li>• Shortage of immediate emergency shelter, which is already very limited in the region.</li> <li>• Priority need is for affordable housing, especially has inflation and the market skyrocket further causing the availability to become scarcer.</li> <li>• Senior population and families are difficult to place due to limitations with income and size/type of housing needed.</li> <li>• Affordability is more than meeting a monthly payment, it is also assisting households with arrears, previous evictions, and those with a criminal background.</li> </ul>
Henrico Department of Social Services	Public Agency that addresses QP needs	<ul style="list-style-type: none"> <li>• Key Stakeholder Interview</li> <li>• 1:1 Discussion with Henrico County staff</li> </ul>	<ul style="list-style-type: none"> <li>• Permanent housing solutions are what are primarily needed. Deeply affordable, accessible housing is the best need.</li> <li>• Supportive services are needed to wrap around the housing to make sure those exiting the system do not re-enter the system.</li> <li>• While they have the infrastructure and track record for providing one-time rental assistance, they do not currently have the capacity to implement a new TBRA project due to staffing issues.</li> </ul>
EmpowerNet	Domestic Violence Hotline	<ul style="list-style-type: none"> <li>• Key Stakeholder Interview</li> </ul>	<ul style="list-style-type: none"> <li>• Coordinated entry would be the best referral method for those looking to enter the current system to receive support.</li> <li>• Having affordable housing that those</li> </ul>

			<p>fleeing domestic violence can be placed into, quickly and without the usual barriers facing low-income renters, would give these clients a way to receive supportive services while having a safe area for themselves and their children.</p> <ul style="list-style-type: none"> <li>• Provided data regarding the domestic violence hotline and demographics for those that called during a year's time frame.</li> </ul>
Richmond YWCA	Domestic Violence Shelter	<ul style="list-style-type: none"> <li>• Listening Session (Homeless Providers)</li> <li>• 1:1 Discussion with Henrico County staff</li> </ul>	<ul style="list-style-type: none"> <li>• Having affordable housing that those fleeing domestic violence can be placed into, quickly and without the usual barriers facing low-income renters, would give these clients a way to receive supportive services while having a safe area for themselves and their children.</li> <li>• The young adult cohort is one that is often not considered, especially those aging out of the foster care system. Those individuals are often left without proper resources or stability, leading them to become homeless quickly after aging out of the system.</li> <li>• HUD Guidelines have not been keeping up with inflation for limits such as Fair Market Rent or how much vouchers are able to be used for, making located an available unit that much harder.</li> </ul>
Partnership for Housing Affordability	Agency that addresses QP needs	<ul style="list-style-type: none"> <li>• Key Stakeholder Interview</li> <li>• Listening Session (Community Partners)</li> </ul>	<ul style="list-style-type: none"> <li>• Provided data from the Housing Resource Line for the demographics of one of the QPs.</li> <li>• There is a serious need for affordable housing in the region, especially for those with &gt;30% AMI.</li> <li>• Rental controls should be considered for the area.</li> <li>• Priority should be on the development and rehabilitation of affordable housing.</li> </ul>
Henrico Community Service Board	Public Agency that addresses QP needs & agency that represents persons with disabilities	<ul style="list-style-type: none"> <li>• Key Stakeholder Interview</li> </ul>	<ul style="list-style-type: none"> <li>• Barriers to housing include previous poor housing history, credit scores, criminal background, and finding landlords that understand the population that falls into the Serious Mental Illness category.</li> <li>• Funds based on disability type are extremely limiting the potential to assist households with these disabilities as they</li> </ul>

			<p>commonly have multiple types. Funding focused primarily on housing status would be more beneficial for assisting these populations.</p> <ul style="list-style-type: none"> <li>• Property manager and landlord education about these populations would be beneficial.</li> </ul>
Chesterfield Community Service Board	Public Agency that addresses QP needs & agency that represents persons with disabilities	<ul style="list-style-type: none"> <li>• Key Stakeholder Interview</li> </ul>	<ul style="list-style-type: none"> <li>• Primary barrier to housing their populations is that the housing stock does not have enough available units.</li> <li>• Making and maintaining relationships with developers has been a goal of this CSB to potentially work towards getting more units set aside for their populations. However, developers do not always understand what affordable housing means especially when working with homeless or at-risk populations with disabilities.</li> </ul>
Richmond Behavioral Health Authority	Public Agency representing persons with disabilities & other QPs	<ul style="list-style-type: none"> <li>• Listening Session (Homeless Providers)</li> <li>• Key Stakeholder Interview</li> </ul>	<ul style="list-style-type: none"> <li>• Reiterated that finding affordable housing units, even for voucher holders, is extremely difficult. There is not enough available housing stock nor stock that has landlords and property managers willing to make accommodations to clients.</li> <li>• Staffing issues have also caused issues with maintaining resources that are trained and can work the system quickly for clients.</li> <li>• Individuals with Serious Mental Illness have barriers to housing entry that are not normally considered when locating housing and need reasonable accommodation from landlords and property managers.</li> <li>• Pregnant and parenting women that move through their programs are primarily coming out of homelessness or at risk of homelessness.</li> </ul>
Virginia Department of Housing and Community Development	Public Agency that addresses QP needs	<ul style="list-style-type: none"> <li>• Key Stakeholder Interview</li> </ul>	<ul style="list-style-type: none"> <li>• Looking to leverage the available local resources when assessing applications for state funding.</li> <li>• Priority for their HOME-ARP Allocation is as capital subsidies to support the development of affordable housing projects.</li> </ul>



Virginia Department of Behavioral Health and Development Services	Public Agency that addresses QP needs	<ul style="list-style-type: none"> <li>• Key Stakeholder Interview</li> </ul>	<ul style="list-style-type: none"> <li>• Allowing clients the choice of their housing and services is important, however unit alignment is an issue as the available affordable housing stock is so low that there is usually only one unit available at the time of service.</li> <li>• Would prefer to avoid seeing concentrations of certain populations, such as those with disabilities, and advocated that there is a need for integration in the community.</li> </ul>
Virginia Housing	Public Housing Authority	<ul style="list-style-type: none"> <li>• Key Stakeholder Interview</li> </ul>	<ul style="list-style-type: none"> <li>• Priority is to transition a portion of the vouchers to project-based to make it easier for households using those vouchers to find housing.</li> <li>• Need for resources to focus on building the capacity and operating funds for nonprofits as they're hitting a ceiling for the number of households and individuals that they serve.</li> </ul>
Virginia Supportive Housing	Homeless Service Provider	<ul style="list-style-type: none"> <li>• Listening Session (Homeless Providers and Community Partners)</li> <li>• 1:1 Discussion with Henrico County staff</li> </ul>	<ul style="list-style-type: none"> <li>• Discussed the need for more affordable housing units, specifically rental, in the area. This was identified as the largest issue faced.</li> <li>• Discussed the difficulties surrounding finding a parcel for development along with figuring out the capital costs for the development.</li> </ul>
Housing Opportunities Made Equal of Virginia, Inc.	Fair Housing Agency	<ul style="list-style-type: none"> <li>• Listening Sessions (Homeless Providers and Community Partners)</li> </ul>	<ul style="list-style-type: none"> <li>• Discussed the difficulties of discrimination against these types of populations when looking for housing and common practices by landlords that create barriers to entry.</li> </ul>
Henrico Mental Health and Development Services	Agency representing persons with disabilities	<ul style="list-style-type: none"> <li>• 1:1 Discussion with Henrico County staff</li> <li>• Survey</li> </ul>	<ul style="list-style-type: none"> <li>• While they have the infrastructure for a TBRA program, they do not currently have the capacity to implement a new TBRA project due to capacity issues.</li> <li>• Influx of vouchers for the County has been their primary priority.</li> </ul>
The Salvation Army RVA	Homeless Service Provider	<ul style="list-style-type: none"> <li>• Listening Session (Homeless Providers)</li> </ul>	<ul style="list-style-type: none"> <li>• Needs permanent supportive housing with supportive services so that they can be housed long-term.</li> </ul>
CARITAS	Homeless Shelter & Service Provider	<ul style="list-style-type: none"> <li>• Listening Session (Homeless Providers)</li> <li>• Survey</li> </ul>	<ul style="list-style-type: none"> <li>• "With the aging populations comes more medical needs. Finding assisted living environments for those w medical needs (even simple ones that make living alone hard) is almost nonexistent."</li> </ul>

			<ul style="list-style-type: none"> <li>• Supported the idea of supportive service mobile units to meet clients at important locations (DMV).</li> <li>• Staffing remains an issue for case managers and shelter staff. Funding to help provide competitive pay and training needs would assist with maintaining the ability to serve the QPs in an effective manner or take on other projects.</li> <li>• More affordable housing options and/or short-term housing options to support households as they transition to permanent supportive housing.</li> </ul>
Saint Joseph’s Villa - Flagler Housing and Homeless Service	Homeless Service Provider	<ul style="list-style-type: none"> <li>• Listening Session (Homeless Providers)</li> </ul>	<ul style="list-style-type: none"> <li>• Discussed how EHC Vouchers and that they are successful due in part due to not being as rigid as other voucher options.</li> </ul>
Housing Families First	Homeless Shelter & Service Provider	<ul style="list-style-type: none"> <li>• Listening Session (Homeless Providers)</li> </ul>	<ul style="list-style-type: none"> <li>• Housing units for families have been difficult to locate.</li> <li>• Persons with cognitive disabilities can be difficult to get resources for due to limited availability.</li> </ul>
Safe Harbor	Domestic Violence and Human Trafficking Shelter	<ul style="list-style-type: none"> <li>• Listening Session (Homeless Providers)</li> </ul>	<ul style="list-style-type: none"> <li>• Organization did not offer input during the Listening Session.</li> </ul>
VA Home for Boys and Girls	Homeless Service Provider	<ul style="list-style-type: none"> <li>• Listening Session (Homeless Providers and Community Partners)</li> </ul>	<ul style="list-style-type: none"> <li>• Organization did not offer input during the Listening Session.</li> </ul>
Daily Planet Health Services	Homeless Service Provider	<ul style="list-style-type: none"> <li>• Listening Session (Homeless Providers)</li> <li>• Survey</li> </ul>	<ul style="list-style-type: none"> <li>• Needs to be an increase in services for elderly and/or frail individuals as well as those with mental illnesses.</li> <li>• Individuals who are not eligible for public assistance get taken out of assisted living situations due to issues such as lack of birth certificate, SSN, and other documents. These are serious barriers to entry for these cases.</li> <li>• Mobile Medical and Street Medicine services have been successful as far as going to those who are unsheltered.</li> <li>• Permanent supportive housing is a priority.</li> <li>• “We cannot overlook the immediate</li> </ul>

			needs of those facing or experiencing homelessness today,” regarding focusing the funding solely on the development of permanent supportive housing.
Richmond Metropolitan Habitat for Humanity	Community Partner that deals with affordable housing	<ul style="list-style-type: none"> <li>• Listening Session (Homeless Providers)</li> </ul>	<ul style="list-style-type: none"> <li>• Organization did not offer input during the Listening Session.</li> </ul>
EMS of Virginia	Homeless Service Provider & agency representing persons with disabilities	<ul style="list-style-type: none"> <li>• Listening Session (Homeless Providers)</li> </ul>	<ul style="list-style-type: none"> <li>• “People receiving disability/SSDI have a lot of difficulty finding housing that they can afford.”</li> <li>• Need for a “one-stop shop” for clients to receive services, application assistance, and linked with housing assistance.</li> <li>• Public private partnerships are incredibly beneficial and should be sought after.</li> </ul>
OAR of Richmond	Homeless Service Provider & Incarceration Re-Entry	<ul style="list-style-type: none"> <li>• Listening Session (Community Partners)</li> <li>• Survey</li> </ul>	<ul style="list-style-type: none"> <li>• Those being released from incarceration usually do not have safe, stable housing and no secure base to build a new life.</li> <li>• Those impacted by the criminal justice system make up a decent portion of the homeless population yet commonly have barriers to entry to the homeless services system,</li> <li>• Barriers include being blocked from services such as rapid rehousing and permanent supportive housing as they commonly have trouble getting off the waitlist for emergency shelter. Many landlords also have blanket bans on persons with felony convictions.</li> </ul>
ACTS	Homeless Service Provider	<ul style="list-style-type: none"> <li>• Listening Session (Community Partners)</li> </ul>	<ul style="list-style-type: none"> <li>• Nonprofit capacity is a large issue when addressing the needs of the qualifying populations.</li> <li>• Decreasing the length of leases has become an issue when getting voucher holders into housing.</li> <li>• Development of affordable housing stock for low and extremely low-income households is needed.</li> </ul>
project:HOMES	Community Partner that deals with affordable housing	<ul style="list-style-type: none"> <li>• Listening Session (Community Partners)</li> </ul>	<ul style="list-style-type: none"> <li>• Organization did not offer input during the Listening Session.</li> </ul>

Commonwealth Catholic Charities	Homeless Shelter & Service Provider	Invited to a Listening Session (Homeless Providers) through email	Agency did not attend the Listening Session nor answer the Survey.
Liberation Veterans Services	Veterans Groups, Homeless Service Providers	Invited to a Listening Session (Community Partners) through email	Agency did not attend the Listening Session nor answer the Survey.
VCU Hospital (Project Empower)	Homeless Service Provider, agency representing persons with disabilities	Invited to a Listening Session (Homeless Providers) through email	Agency did not attend the Listening Session nor answer the Survey.
Henrico County Public Schools	Agency works with McKinney-Vento Students	Invited to a Listening Session (Homeless Providers) through email	Agency did not attend the Listening Session nor answer the Survey.
Resources for Independent Living Inc and Central Virginia Resource Corporation	Agency representing persons with disabilities	Invited to a Listening Session (Homeless Providers) through email	Agency did not attend the Listening Session nor answer the Survey.
Virginia Department of Veteran Services	Public agency that serves veterans.	Invited to a Listening Session (Homeless Providers) through email	Agency did not attend the Listening Session nor answer the Survey. Hen
Henrico Capital Region Workforce	Public Agency	Invited to a Listening Session (Community Partners) through email	Agency did not attend the Listening Session nor answer the Survey.
Chesterfield Mental Health Support Services	Public agency representing persons with disabilities	Invited to a Listening Session (Community Partners) through email	Agency did not attend the Listening Session nor answer the Survey.
Senior Connections	Non-profit	Invited to a Listening Session (Community Partners) through email	Agency did not attend the Listening Session nor answer the Survey.
The James House	Domestic Violence Shelter	Invited to a Listening Session (Homeless Providers) through email	Agency did not attend the Listening Session nor answer the Survey.

Hanover Safe Place	Domestic Violence Shelter	Invited to a Listening Session (Homeless Providers) through email	Agency did not attend the Listening Session nor answer the Survey.
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Table 1: List of the organizations consulted or attempted to consult with

# Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of the qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. This is to gain an understanding of the current make-up of the qualifying populations and the apparent gaps and strains in the current system. Homeless service providers that serve Henrico County also serve Chesterfield County and the City of Richmond, among others, thus regional breakdowns are the primary way this data is described, though Henrico specific data is included where possible. There are limitations to the data available surrounding the qualifying populations, and figures may not be exact matches due to these limitations. This analysis will break down the source of the data and the jurisdictional context for each figure and findings will be based on the best inferences possible from the multiple sources of data.

When referring to the “Region” in this section, it is referencing the service area of the Greater Richmond Continuum of Care (GRCoC). This service area includes the City of Richmond and the Counties of Charles City, Chesterfield, Goochland, Hanover, Henrico, and New Kent. Cases when the geography is not solely Henrico County or the entire Region are specified in their respective sections.

## Size and Demographic Composition of the Qualifying Populations:

### Homeless as defined in 24 CFR 91.5

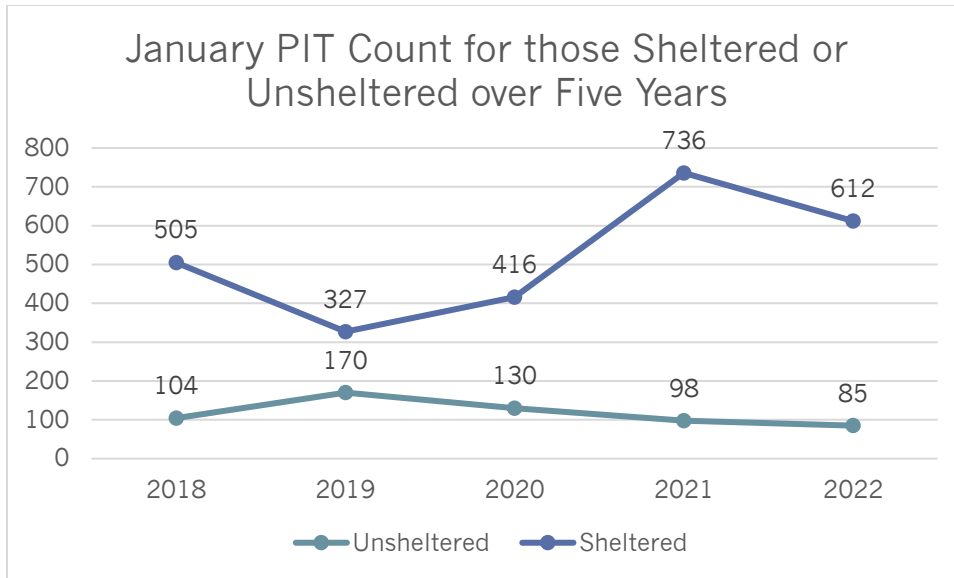
#### Regional

Twice a year, the Greater Richmond Continuum of Care (Homeward) conducts a Point in Time (PIT) count to gather a census on the number of sheltered and unsheltered persons experiencing homelessness in Henrico, Chesterfield, Hanover, and Richmond. According to the January 2022 PIT, there were a total of 697 people (513 households) experiencing homelessness with 612 (418 households) having some form of shelter (emergency, transitional, or safe haven) and 85 persons/households being unsheltered.<sup>1</sup> This is a 17% decrease from the reported number of persons experiencing homelessness in January 2021, which was reported to be at 838, however it is still a 27.6% increase from the January 2020 PIT which was reported to be at a total of 546 persons.<sup>2</sup> Out of the 513 households, there was a total of 428 adult only households and 85 households with children.

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<sup>1</sup> Homeward January 2022 PIT

<sup>2</sup> <https://www.homewardva.org/january-point-in-time-count-shows-large-increase-in-region-s-homeless-population>



**Graph 1:** January PIT Count for those sheltered or unsheltered over the span of five years.

From the PIT county from January 2022, there were 222 persons classified as chronically homeless which is defined by HUD as an individual or household that has “*experienced homelessness for longer than a year, during which time the individual may have lived in a shelter, Safe Haven, or a place not meant for human habitation.*” 41.6% for adult only households and 15.6% of households with children meet the definition of chronically homeless in the Region.

For households with children, the majority of persons are under the age of 18, identify as female, are Black, African American, or African, and are Non-Hispanic/Latin(a)(o)(x). This differs from the adult only households, which are primarily over the age of 24, identify as male, are Black, African American, or African, and are Non-Hispanic/Latin(a)(o)(x). The racial and ethnicity demographics for both types of households are similar, with both in the 60 to 70 percentile range for Black, African American, or African for race and in the upper 90s percentile range for Non-Hispanic/Latin(a)(o)(x) for ethnicity. The demographic characteristics for households with at least one adult and one child and adult only households are displayed in the tables below.

<b>January 2022 PIT Demographics for Persons in Households with at least One Adult and One Child</b>					
	Emergency Shelter	Transitional Shelter	Unsheltered	Total	Total Percentage
<b>Age</b>					
<18	139	5	0	144	55.6%
18-24	23	1	0	24	9.3%
>24	87	4	0	91	35.1%
<b>Gender</b>					
Female	145	6	0	151	58.3%
Male	101	4	0	105	40.5%
Gender that is not singularly 'Female' or 'Male'	2	0	0	2	0.8%
Questioning	0	0	0	0	0.0%
Transgender	1	0	0	1	0.4%
<b>Ethnicity</b>					
Non-Hispanic/Non-Latin(a)(o)(x)	230	10	0	240	92.7%
Hispanic/Latin(a)(o)(x)	19	0	0	19	7.3%
<b>Race</b>					
American Indian, Alaska Native, or Indigenous	1	0	0	1	0.4%
Asian or Asian American	2	0	0	2	0.8%
Black, African American, or African	179	0	0	179	69.1%
Native Hawaiian or Pacific Islander	1	0	0	1	0.4%
White	44	0	0	44	17.0%
Multiple Races	22	0	0	22	8.5%
<b>Chronically Homeless</b>					
Persons	40	0	0	40	15.4%

**Table 2:** January 2022 PIT Demographics for Persons in Households with at least One Adult and One Child



January 2022 PIT Demographics for Adult Only Households						
	Emergency Shelter	Transitional Shelter	Safe Haven	Unsheltered	Total	Total Percentage
<b>Age</b>						
18-24	13	0	0	30	43	9.8%
>24	296	16	28	55	395	90.2%
<b>Gender</b>						
Female	79	2	1	21	103	23.5%
Male	226	14	27	64	331	75.6%
Gender that is not singularly 'Female' or 'Male'	2	0	0	0	2	0.5%
Questioning	0	0	0	0	0	0.0%
Transgender	2	0	0	0	2	0.5%
<b>Ethnicity</b>						
Non-Hispanic/ Non-Latin(a)(o)(x)	301	16	27	80	424	96.8%
Hispanic/ Latin(a)(o)(x)	8	0	1	5	14	3.2%
<b>Race</b>						
American Indian, Alaska Native, or Indigenous	5	0	0	1	6	1.4%
Asian or Asian American	0	0	0	1	1	0.2%
Black, African American, or African	206	11	22	38	277	63.2%
Native Hawaiian or Pacific Islander	0	0	0	0	0	0.0%
White	83	5	6	41	135	30.8%
Multiple Races	15	0	0	4	19	4.3%
<b>Chronically Homeless</b>						
Persons	154	0	5	23	182	41.6%

**Table 3:** January 2022 PIT Demographics for Persons in Adult Only Households

To obtain a more detailed demographic breakdown of the GRCoC Region, CSH staff used data from Stella P, a data visualization tool, provided by HUD. Stella P utilizes data from the Homeless Management Information System (HMIS) and uses algorithms to deduplicate data. Because of this, there are some minor inconsistencies including different totals for different categories. This data does, however, provide a broader context related to the demographic composition of the people experiencing homelessness.

The data used to analyze the demographic composition of the population experiencing homelessness included clients entered into the HMIS system between October 1, 2020, and September 30, 2021.

According to Stella P, during this time period, 2,544 households were entered into the Richmond CoC HMIS system and received service. The 2,544 households included 2,026 adult only households and 518 households with at least one adult and one child.

The majority of the households served in the GRCoC Region were Black, African-American, or African. They represented 73.5% of the households captured in HMIS. This is over two and a half times the percentage of this demographic in the general population overall where 28% of persons identify as Black, African American, or African. Table 4 below shows the demographic characteristics of the households and persons entered into HMIS. Other demographic majorities found from this data set include persons that identify as male and non-veterans. The age cohort that has the most significant representation are those between the ages of 55 and 64. A total of 26% of the population during this time were self-identified as domestic violence survivors, and 8.2% of the population was currently fleeing domestic violence during the time of entry into HMIS.

<b>GRCoC HMIS Demographic Characteristics - October 2020 to September 2021</b>			
	Adult Only Households	Households with Children	Persons
<b>Race and Ethnicity</b>			
American Indian, Alaska Native or Indigenous	13	5	
Asian or Asian American	7	3	
Black or African American or African	1433	437	
Multiple Races	0	0	
Native Hawaiian or Pacific Islander	3	3	
White, Hispanic/Latin(a)(o)(x)	27	16	
White, Non-Hispanic/Non-Latin(a)(o)(x)	506	48	
Unknown	37	6	
<b>Gender</b>			
Female			973
Male			1548
No Single Gender			6
Questioning			0
Transgender			19
Unknown			19
<b>Age</b>			
0-5			355
6-17			386
18-24			260
25-54			1585
55-64			550
65+			164
Unknown			8
<b>Veteran Status</b>			
Veteran			266
Non-Veteran			2255
Unknown			42
<b>Domestic Violence Status</b>			
Not a DV Survivor			1819
DV Survivor and Currently Fleeing			211
DV Survivor and Not Currently Fleeing			458
Unknown			77

**Table 4:** Greater Richmond CoC HMIS Demographic Breakdown from October 2020 to September 2021

## Henrico County

The Homeless Management Information System (HMIS) is used by all service providers in the Greater Richmond Continuum of Care (GRCoC) to collect and manage demographic data for the households and persons served. While this is not a completely comprehensive view of the homelessness population and services in Henrico County or the Region, as there are service providers not in the GRCoC that do not use HMIS, it provides the most accurate information available for the homeless qualifying population. From October 1, 2020, to September 20, 2021, 557 households (860 persons) that identified Henrico County as the place of their last permanent address were entered into HMIS.

The demographic breakdown of this qualifying population represents individuals rather than household. Data labels are taken directly from HUD and HMIS. The majority of clients from the Henrico County specific data were those that identified as female, between the ages of 25-54, identified as Black, African American, or African, and Non-Hispanic/Non-Latin(a)(o)(x), were disabled, and were non-veterans. This mirrors with what the GRCoC Region and the Stella P data indicated for the Richmond Region as a whole. The domestic violence statistic and those fleeing domestic violence percentages also aligned with the Region, as Henrico County had 28.4% of the homeless population answer “yes” to experiencing some form of domestic violence, and only 12% indicated that they were fleeing domestic violence at the time of entry into HMIS.

Table 5 provides additional demographic detail for Henrico County specific data.

<b>Henrico County HMIS Demographic Data by Persons from October 2020 to September 2021</b>		
<b>Race</b>	<b>Total</b>	<b>Percentage</b>
American Indian, Alaska Native, or Indigenous	8	0.9%
Asian or Asian American	3	0.3%
Black, African American, or African	613	71.3%
Native Hawaiian or Pacific Islander	1	0.1%
Other Multi-Racial	46	5.3%
White	188	21.9%
Unknown	1	0.1%
<b>Ethnicity</b>	<b>Total</b>	<b>Percentage</b>
Hispanic/Latin(a)(o)(x)	36	4.2%
Non-Hispanic/Non-Latin(a)(o)(x)	822	95.6%
Unknown	2	0.2%
<b>Age</b>	<b>Total</b>	<b>Percentage</b>
0-5	99	11.5%
6-17	164	19.1%
18-24	92	10.7%
25-54	381	44.3%
55-64	102	11.9%
65+	22	2.6%
<b>Gender</b>	<b>Total</b>	<b>Percentage</b>
Female	460	53.5%
Male	395	45.9%
Transgender	2	0.2%
Unknown	2	0.2%
A gender other than singularly female or male	1	0.1%
<b>Disabled</b>	<b>Total</b>	<b>Percentage</b>
Yes	488	56.7%
No	368	42.8%
Unknown	4	0.5%
<b>Veteran Status</b>	<b>Total</b>	<b>Percentage</b>
Veteran	31	3.6%
Non-Veteran	818	95.1%
Unknown	11	1.3%

<b>Domestic Violence Status</b>	<b>Total</b>	<b>Percentage</b>
DV Survivor	244	28.4%
Not a DV Survivor	613	71.3%
DV Status Unknown	3	0.3%
<b>Fleeing Domestic Violence</b>	<b>Total</b>	<b>Percentage</b>
Yes	103	12.0%
No	203	23.6%
Question Not Asked	543	63.1%
Client Does Not Know	1	0.1%

**Table 5:** Racial and Ethnic Composition of Persons Experiencing Homelessness in Comparison to General Population

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

HUD receives custom tabulations of American Community Survey (ACS) data from the U.S. Census Bureau. This data, known as “CHAS” data (Comprehensive Housing Affordability Strategy) quantifies the extent of housing problems and housing needs, particularly for low- to moderate-income households. The most current CHAS data for Henrico County is from 2015-2019. Henrico County anticipates that the number of households with a cost burden has increased since 2019 due to a variety of housing cost increases, specifically rent costs.

HUD defines those at risk of homelessness as individuals and families, with an income at or below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability. According to HUD’s CHAS 2015-2019 and ACS 2020 data, there were 47,975 total renters in the County of Henrico.

Of these renters, 9,160 were extremely low income (less than 30% AMI) which qualifies them as at-risk of homelessness. Of these extremely low-income households, there were 7,465 households experiencing at least one housing problem as defined by the ACS, indicating that they are staying in inadequate housing. The ACS recognizes four causes of inadequate housing/housing problems: incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per [bed]room, and cost burden greater than 30% of households gross income. Cost burden is defined as a household paying more than 30% of their income toward housing costs, and severe cost burden is defined as a household paying more than 50% their of income toward housing costs. For renters who with an income at 30% AMI or less, a total of 72% of the households are severely cost burdened and 10% are cost burdened.

There are 8,100 renters with incomes between 30% and 50% AMI, and 87% of this income cohort is experiencing at least one housing problem. For renters with an income between 30% and 50% AMI, 39% of households are severely cost burdened and 42% are cost burdened.

<b>Cost Burdened Rental Households by Household Area Median Family Income</b>			
Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	7,425	6,880	<b>9,160</b>
Household Income >30% to <=50% HAMFI	6,880	2,485	<b>8,100</b>
Household Income >50% to <=80% HAMFI	5,650	370	<b>12,105</b>
Household Income >80% to <=100% HAMFI	715	165	<b>5,765</b>
Household Income >100% HAMFI	275	85	<b>12,840</b>
<b>Total</b>	<b>20,945</b>	<b>9,985</b>	<b>47,975</b>

**Table 6:** Cost Burdened Households by Household Area Median Family Income

<b>Housing Problems for Renters by Household Area Median Family Income</b>			
Income by Housing Problems (Renters only)	Household has at least 1 of 4 Housing Problems	Household has no Housing Problems OR cost burden not available and no other problems	Total
Household Income <= 30% HAMFI	7,465	1,695	<b>9,160</b>
Household Income >30% to <=50% HAMFI	7,025	1,075	<b>8,100</b>
Household Income >50% to <=80% HAMFI	6,035	6,070	<b>12,105</b>
Household Income >80% to <=100% HAMFI	965	4,805	<b>5,765</b>
Household Income >100% HAMFI	635	12,205	<b>12,840</b>
<b>Total</b>	<b>22,120</b>	<b>25,855</b>	<b>47,975</b>

**Table 7:** Housing Problems for Renters by Household Area Median Family Income

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

The data from the EmpowerNet Hotline focuses primarily on those experiencing or fleeing domestic violence. The EmpowerNet Hotline serves the geographic area of the City of Richmond and the Counties of Chesterfield, Hanover, and Henrico. The data was collected between July 2021 and June 2022.

During this time, there were 1,442 calls to the hotline from Chesterfield, Henrico, and the City of Richmond. A total of 409 of the callers identified their location as Henrico County. Table 8 includes the demographic breakdown of all 1,442 callers as this data is not broken down by jurisdiction. The data set has a higher number of “Not Applicable/No Answer” responses because callers often are in crisis and are unable to give detailed demographic data at the time

of their call. This data is difficult to obtain due to the population involved, however what has been provided still gives a snapshot of the characteristics of this qualifying population.

<b>EmpowerNet Hotline Caller Demographics from July 2021 to June 2022</b>		
<b>Race and Ethnicity</b>	<b>Total</b>	<b>Percentage</b>
American Indian, Alaska Native, or Indigenous	16	1.1%
Asian or Asian American	25	1.7%
Black, African American, or African	741	51.4%
Native Hawaiian or Pacific Islander	6	0.4%
Other Multi-Racial	147	10.2%
White	428	29.7%
Hispanic/Latin(a)(o)(x)	125	8.7%
<b>Approximate Age</b>	<b>Total</b>	<b>Percentage</b>
<18	14	1.0%
18-24	214	14.8%
25-39	809	56.1%
40-59	369	25.6%
>59	36	2.5%
<b>Gender</b>	<b>Total</b>	<b>Percentage</b>
Female	460	31.9%
Male	395	27.4%
Transgender	2	0.1%
Unknown	2	0.1%
A gender other than singularly female or male	1	0.1%
<b>Disabled</b>	<b>Total</b>	<b>Percentage</b>
Yes	133	9.2%
No	241	16.7%
Not Applicable/No Answer	1068	74.1%
<b>Veteran Status</b>	<b>Total</b>	<b>Percentage</b>
Veteran	6	0.4%
Non-Veteran	205	14.2%
Not Applicable/No Answer	1231	85.4%
<b>Does the person identify as homeless?</b>	<b>Total</b>	<b>Percentage</b>
Yes	110	7.6%
No	235	16.3%
Not Applicable/No Answer	1097	76.1%



Type of Violence Experienced	Total	Percentage
Adult - Domestic Violence	1248	86.5%
Adult - Domestic Violence as a Child	15	1.0%
Child/Youth - Domestic Violence/Abuse	6	0.4%
Child/Youth - Exposed to Domestic Violence	2	0.1%
Teen Dating Violence	2	0.1%
None of the Above	169	11.7%

**Table 8:** EmpowerNet Hotline Caller Demographics from July 2021 to June 2022

**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**

There is a large overlap between those at-risk of homelessness (above data) and households in need of assistance to prevent homelessness or are at a greater risk of housing instability. Lack of affordability is the primary issue highlighted in data and consultation. Of the severely cost burdened, 6,595 are households in the extremely low-income range ( $\leq 30\%$  AMI) and are considered at the greatest risk of housing instability.

The Housing Resource Line, a regional service that connects households experiencing housing instability to housing related resources has received 3,567 calls from Henrico County. Of these calls, 55% of callers identified themselves as Black or African American, 22% of callers identified as white, 3% of callers identified as Latino, and 4% of callers identified as Multi-Racial. Approximately 16% of callers did not identify their race or ethnicity on their call. While this is not an all-encompassing demographic breakdown of the population, since the data only represent those persons who call the Housing Resource Line, it does provide a general snapshot of those experiencing housing instability in the County.

## Unmet Housing and Service Needs of Qualifying Populations:

GRCoC Region Homeless Gaps Analysis																
	Current Inventory						Homeless Population				Gap Analysis					
	Family		Adult Only		Vets	Survivors of DV	Households with Adults & Children	Adult Only HH	Vets*	Survivors of DV**	Family		Adults Only		Survivors of DV	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds	# of Beds					# of Beds	# of Units	# of Beds	# of Units	# of Beds targeted	# of Units
Emergency Shelter	256	84	193	193	0	13										
Transitional Housing	13	3	22	22	21	4										
Permanent Supportive Housing	181	65	586	586	518	0										
Safe Haven	0	0	47	47	44	47										
Other Permanent Housing	9	2	86	86	14	0										
Sheltered Homeless							259	353	49	159						
Unsheltered Homeless							0	85	9	22						
Current Gap											(10)	(2)	223	223	117	117

**Table 9:** Greater Richmond Continuum of Care Region’s Homeless Gaps Analysis per the January 2022 PIT Count and the 2022 Housing Inventory Count

\*The GRCoC PIT does not collect information regarding Veteran Status. The percentage 10.5% found from the Stella P data was applied to the total number of adults experiencing homelessness to approximate this figure.

\*\* The GRCoC PIT does not collect information regarding domestic violence status. The percentage of 26% found from the Stella P data was applied to the total number of persons experiencing homelessness to approximate this figure.

**Homeless as defined in 24 CFR 91.5 and Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice**

Table 9 above shows the current inventory available to house those experiencing homelessness as defined in 24 CFR 91.5 using the 2022 Housing Inventory Count that is completed by the Greater Richmond Continuum of Care (GRCoC) annually. This Housing Inventory County categorizes the available beds and units of various types of housing available for those in housing crisis, such as emergency shelter, transitional housing, Safe Haven beds, rapid re-housing, and permanent supportive housing. This count also breaks down which facility has beds and units designated for households with at least one child and those that are adult only households, as well as which beds or units were being used by Veterans and those that were targeted for survivors of domestic violence. The January 2022 Point in Time was used for the counts of sheltered and unsheltered persons, with the Stella P demographic percentages being applied for Veterans and survivors of domestic violence.

The final gaps analysis is based off the amount of emergency shelter and transitional housing available for households with children and adult only households. These are the households that would be counted during the PIT, thus are the populations that are experiencing the gap in resources. The survivors of domestic violence gap is calculated on the number of beds targeted to survivors of domestic violence and Safe Haven beds subtracted from the estimates of those that reported on being survivors of domestic violence when being entered into HMIS.

The analysis showed that there is an unmet need and gap in the availability of shelter beds and units for adult only households, with an unmet need of 223 beds/units, and as of the January 2022 PIT, there were 85 persons unsheltered. There is also an unmet need and gap in the availability of shelter beds and units for survivors of domestic violence. Using the Stella P percentage discussed previously, it was estimated that a total of 181 persons were survivors of domestic violence during the January 2022 PIT. The Housing Inventory Count indicated that there were only 47 Safe Haven beds and 17 beds targeted to serve survivors of domestic violence, creating a large gap and unmet need for this population.

This analysis shows that there is not a gap or unmet need for shelter beds or units for households with at least one adult and one child, with an excess of 10 beds and two units. While this is not a gap, this overage is not significant enough to disregard the need for beds or units for households with children.

Henrico County Non-Homeless Gaps Analysis				
	Current Inventory	AMI of Renters	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households	# of Households
Total Rental Units	47,975			
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	4,003			
Rental Units Affordable to HH at 50% AMI (Other Populations)	24,180			
0%-30% AMI Renters		9,160		
30% - 50% AMI Renters		8,100		
0% - 30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)			7,465	
30% - 50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)			7,025	
<b>Current Gaps for 0% to 30% AMI Renters</b>				<b>5,157</b>
<b>Current Gaps for 30% to 50% AMI Renters</b>				<b>(9,055)</b>

**Table 10:** Henrico County Non-Homeless Gaps Analysis per the 2020 American Community Survey and 2015-2019 CHAS

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

Table 10 above shows the affordability of rent in Henrico County using the 2020 American Community Survey estimates and the 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data. This table shows that there is a gap in the amount of affordable rental housing for households that make 30% AMI or below, with a need for 5,157 units that are affordable to this demographic. Those with 30% AMI have a total of 81% of households were experiencing at least one housing problem. As discussed in the demographic characteristics of the At Risk of Homelessness qualifying population, a total of 72% of the households that are extremely low-income (30% AMI or below) are severely cost burdened and 10% are cost burdened.

There are 8,100 renters that are between 30% and 50% AMI, and 87% of this income cohort is experiencing at least one housing problem. For renters with an income between 30% and 50% AMI, a total of 39% of households are severely cost burdened and a total of 42% are cost burdened. However, there is not a gap for this income cohort, as the analysis shows that there are 9,055 units that are affordable to this income cohort and do not have one or more housing problem.

## Gaps within the current Shelter and Housing Inventory and the Service Delivery System:

The primary gap in the shelter and housing inventory is the availability of deeply affordable housing units, permanent supportive housing (PSH) for those experiencing homelessness, and non-congregate shelter for survivors of domestic violence.

The availability of housing units does not meet the needs of the qualifying populations. As discussed above, there are 9,160 extremely low-income renters in Henrico, and there are only 4,003 affordable and available homes for rent, meaning there is a gap of 5,157 for affordable housing units in Henrico County for those with extremely low-income. These are also the households that would need short term rental assistance to prevent eviction and entrance into homelessness, which currently is not an available service in the Region.

From the PIT county from January 2022, there were 222 persons classified as chronically homeless which is defined by HUD as an individual or household that has “*experienced homelessness for longer than a year, during which time the individual may have lived in a shelter, Safe Haven, or a place not meant for human habitation.*” 41.6% for adult only households and 15.6% of households with children meet the definition of chronically homeless in the Region. PSH has been successful in addressing chronic homelessness to assist the stabilization of household through the application of supportive services. There are currently 568 units of permanent supportive housing in the Region, however according to the 2022 Housing Inventory Count, only two of eleven facilities that provide PSH were not at or over a 100% utilization rate. This means that there are only approximately 6 PSH units available for those that need access to this form of housing.

Need for Permanent Supportive Housing				
	Existing Stock	Annual Turnover Rate	# Available Annually	Annual Need (based on assumptions)
PSH (Families)	65	-	0	<b>85</b>
PSH (Individuals)	586	0.04	26	<b>1041</b>

**Table 11:** Need for Permanent Supportive Housing based on the current housing stock and annual turnover rate.

Table 11 describes the existing stock available for PSH based the assumption for the number of units available annually. Turnovers are calculated as the number of households leaving PSH divided by the inventory of units based. The number of available units annual is calculated by the inventory of units multiplied by the turnover rate. The results of this table show that there is an annual need for 1,126 units of PSH in the Region, which shows that there is a gap of 475 units of PSH.

Lastly, there is a large unmet need for non-congregate shelter beds to be available to survivors of domestic violence. These shelters require a increased security and safety measures to provide adequate service to those fleeing domestic violence or human trafficking. Currently, there is a gap of 117 beds servicing this population in the Region.

## **Additional Characteristics associated with Instability and Increased Risk of Homelessness**

During the stakeholder consultation process, several homeless service providers indicated that there were intersectional identities that presented unique challenges to obtaining and maintaining suitable, stable housing.

Single parents was a population brought up multiple times throughout the consultation process. It is this population that commonly faces problems maintaining housing due to the necessities surrounding childcare, transportation, and education for their children. Service providers indicated that locating affordable, safe housing in proximity to school or education center was a barrier to locating housing. Affordable childcare was another major barrier that single parents face, as often their incomes were not able to cover both housing costs and childcare costs. Lastly, housing that is available to these households often does not have reliable, if any, public transportation which is another barrier to supporting these households in maintaining employment and education opportunities.

Folks that are returning from incarceration was another population that was mentioned during the consultation process. This population often faces barriers and discrimination based on previous criminal records for housing and employment opportunities. This form of discrimination is illegal though landlords have been increasing the security deposits as a way of enforcing this act of discrimination.

## **Priority Needs for Qualifying Populations:**

There were three priority needs that were pulled from this analysis and the stakeholder consultations:

- Affordable housing development for those At-Risk of Homelessness and Other Populations
- Development of Permanent Supportive Housing for the Homeless population
- Development of Non-Congregate Shelter for Survivors of Domestic Violence

These determinations are based off the stakeholder consultation and the needs assessment and gaps analysis, as detailed above.

## **Method of Determination of the Level of Need and Gaps in the Shelter and Housing Inventory and Service Delivery System:**

To determine the level of need and the gaps being experienced, Henrico County and CSH looked at both qualitative and quantitative measures. Quantitative data was gathered and used from the:

- American Community Survey 2020 Estimates
- Comprehensive Housing Affordability Study (CHAS)
- Homeless Inventory Management System (HMIS)
- Stella P (a HUD visualization tool using HMIS data)
- Housing Resource Line

- January 2022 Point in Time Count
- EmpowerNet Hotline
- 2022 Housing Inventory Count

These data sources were used in partnership with feedback and on-the-ground insights from key stakeholders in the area. The takeaways from data analysis and stakeholder input were incorporated into the needs assessment when determining the priority needs and which qualifying populations should be targeted for preference or limitations.

# HOME-ARP Activities

This section describes how Henrico County is proposing to use the HOME-ARP allocation to address the unmet needs and gaps ascertained from the consultation process and needs assessment and gaps analysis. In addition, the method that Henrico County will use to solicit agencies, subrecipients, or other partners to undertake these activities is also outlined below. The funding amounts below are proposed amounts and may be adjusted based on the proposals received during the solicitation process.

## Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 500,000	15.5%	
Acquisition and Development of Non-Congregate Shelters	\$ 500,000	15.5%	
Tenant Based Rental Assistance (TBRA)	\$ 0	0 %	
Development of Affordable Rental Housing	\$ 2,000,000	62.2%	
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 216,865	6.7%	15%
<b>Total HOME ARP Allocation</b>	<b>\$ \$3,216,865</b>		

**Table 12:** Proposed distribution of HOME-ARP funds for each type of eligible activity

The primary need that surfaced from the consultation sessions and the needs assessment is the need for deeply affordable housing. The needs assessment and gaps analysis demonstrated that while there is a gap in the number of shelter beds available to the qualifying populations, there is a greater need for permanent solutions to be added to the current system. Additional shelter beds will be developed through non-congregate shelter, and those units will have a *limitation* for those fleeing, or attempting to flee, domestic violence or human trafficking. This *limitation* is described in a later section.

To address the needs of lack of affordable housing and non-congregate shelter, Henrico County will pursue a capital project(s) that will be accessible for all four QPs. By increasing the available affordable housing stock, households experiencing crisis can regain their stability and break the cycle of homelessness for their household. In addition, by moving households in distress to permanent housing, they are freeing up shelter beds that can be used for the next household in need. Households will also receive essential services including, case management, parenting classes, work force development etc. to ensure households remain independent and thrive.

The needs assessment and gaps analysis concluded that there is a gap of 475 PSH units, 117 non-congregate shelter beds, and 5,157 deeply affordable rental units. The proposed use of



these funds addresses the development all three of these housing types, along with the creation of short-term rental assistance for those at-risk of homelessness to prevent eviction and entry into homelessness.

Rental assistance will prevent households at risk of becoming homeless remain housed. While this activity does not increase the amount of affordable housing in Henrico County it diverts people from shelters so those resources can be used by others in the community experiencing crisis.

## **Methods for Soliciting Applications for Funding and Selection of Subrecipients**

The County of Henrico will use the standard procurement process that is currently in place when using a Request for Proposal (RFP) or Notice of Funding Opportunity (NOFO) method. This RFP will be aimed at experienced nonprofit organizations that work with the qualifying populations to develop affordable housing, acquisition or development of non-congregate shelter, provide supportive services, and administer rental assistance. The RFP or NOFO will be posted by the Henrico County Purchasing Office to the Commonwealth of Virginia's eVA Procurement System. Additionally, we will request assistance from the Continuum of Care to distribute the RFP or NOFO to their email listserv.

There is a potential for Henrico and Chesterfield Counties and the City of Richmond to enter a Memorandum of Understanding and release an RFP or NOFO together if there is a project that will serve all three jurisdictions which would benefit from receiving HOME-ARP funds from all three jurisdictions.

The County of Henrico will allocate funds to one or more Subrecipients or contractors to oversee the development of permanent supportive housing units ,non-congregate shelter, provide supportive services, or administer rental assistance to serve the QPs. The chosen Subrecipient(s) will provide invoices for any type of eligible activity along with appropriate supporting documentation. Henrico will be providing technical assistance and programmatic monitoring of the activity to ensure that the HOME-ARP funds are being used for eligible activities.

No funds designated for Administration and Planning will be provided to a subrecipient or contractor prior to HUD's acceptance of the Allocation Plan.

## HOME-ARP Production Housing Goals

The primary goal HOME ARP funds will be used for is to increase the amount of affordable housing that is appropriate for households accessing the Coordinated Entry System and on the PHA waitlists. Henrico County will pursue projects that develop affordable housing, which includes permanent supportive housing (PSH) units. The estimated number of units HOME ARP funds will create is 20 -40.

By creating affordable housing that includes PSH units, referral partners will have the flexibility to better match clients with housing that meets their specific needs. Households that only require deeply affordable rents to regain and maintain stability can be matched to units that do not offer essential services. Households that require affordable rent but need short term essential services can be matched with units that provide those services and finally those households that need long term essential services can be matched with PSH.

## Preferences and Limitations

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. This section delves into how preferences have been determined, how these preferences will address the unmet need or gap in benefits, and the method of prioritization that will occur to determine the order of applicants to specific eligible activities. For a more detailed explanation of *preferences*, *method of prioritization*, and *limitations* per the Notice, see [Appendix F](#).

### Identify the Intended Preferences

There will be no preferences given to any qualifying populations for any of the eligible activities being funded. There will be a *limitation*, described below, placed on the non-congregate shelter.

### Identify the Intended Limitations

The non-congregate shelter units will have a limitation placed on them for those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD in the notice. The use of a limitation is necessary due to the gap of 117 non-congregate shelter beds for survivors of domestic violence. Due to the necessary security measures that must be put in place for the safety of this population, a limitation is necessary to ensure that the shelter location is not disclosed to other populations.

Other qualifying populations will be eligible for service through the development of permanent supportive housing, affordable housing, and rental assistance. These populations will be served on a first come, first serve basis using a waitlist system. All qualifying populations will have an opportunity for service through one of the three activities being funded through the use of the HOME-ARP allocation.

## Referral Methods

The County of Henrico will use a waiting list the selection of households to be served in the permanent supportive housing (PSH). The Coordinated Entry (CE) system, Homeless Crisis Line, and Housing Resource Line will be utilized to refer households and individuals to the subrecipient operating the PSH, at which then the subrecipient is responsible for the intake process and placing the households or individuals on the wait list. Assistance will be given on a first come, first serve basis. There will be no *method of prioritization* implemented for this eligible activity. For projects funded that are not located in Henrico County, a set number of units based on the percentage of funding allocated will be reserved for qualifying populations either located in Henrico County or their last permanent address was located in Henrico County.

For rental assistance, households and clients will be referred to the subrecipient through the Housing Resource Line and Homeless Crisis Line to the subrecipient. The organization selected to be the subrecipient will be responsible for operating a waitlist for assistance and applicants will be served on a first come, first serve basis. There will be no *method of prioritization* implemented for this eligible activity.

The non-congregate shelter will have a *limitation* placed on it for those fleeing, or attempting to flee, domestic violence or human trafficking. These clients will be referred to the subrecipient for serve through the EmpowerNet Hotline and other domestic violence providers in the area.

## HOME-ARP Refinancing Guidelines

The County of Henrico does not intend to use HOME-ARP funds to refinance existing multifamily housing debt through rehabilitation activities.

# HOME-ARP Allocation Plan Appendices

**Appendix A:** Resolution of the Board of Supervisors, March 14, 2023

**Appendix B:** March 14, 2023, Public Meeting Minutes

**Appendix C:** Public Hearing Notices

**Appendix D:** HOME-ARP Allocation Plan Public Hearing Presentation and Minutes, February 16, 2023

**Appendix E:** Table of Organizations Contacted for Consultation

**Appendix F:** Definition of a Preference, Method of Prioritization, and Limitation per CPD Notice 21-10.

**Certifications and SF 424**

# Appendix A: Resolution of the Board of Supervisors, March 14, 2023

This page will be updated after the March 14, 2023, Board of Supervisors meeting.

## Appendix B: March 14, 2023, Public Meeting Minutes

This page will be updated after the March 14, 2023, Board of Supervisors meeting.

## Appendix C: Public Hearing Notices

This page will be updated after the public hearing notices are published in the Richmond Times Dispatch, Henrico Citizen, and the Free Press. Screenshots from the Facebook and Twitter pages will be included.

# Appendix D: HOME-ARP Allocation Plan Public Hearing Presentation and Minutes, February 16, 2023

This page will be updated once the HOME-ARP Allocation Plan public hearing occurs on February 16, 2023.



## Appendix E: Table of Organizations Contacted for Consultation

<b>Listening Sessions 1 &amp; 2 Outreach</b>	
<b>Organization</b>	<b>Stakeholder Group</b>
Homeward	CoC
Homeward	CoC
Housing Families First	HSP
Saint Joseph's Villa	HSP
Commonwealth Catholic Charities	HSP
CARITAS	HSP
Focused Outreach	HSP
EmpowerNet	HSP
Hanover Safe Place	HSP, DV
HomeAgain	HSP
Salvation Army	HSP
ACTS	HSP
ACTS	HSP
Goochland Cares	HSP
Hand Up	HSP
Daily Planet	HSP
Daily Planet	HSP
Virginia Supportive Housing	HSP
Virginia Supportive Housing	HSP
Safe Harbor	HSP, DV
Liberation Veterans Services	HSP, Vets
YWCA	HSP, DV
YWCA	HSP, DV
The James House	HSP
VCU Hospital program (Project Empower)	Public Agencies
Bon Secours	CP
Credit Restoration Institute	CP
The Community Foundation	CP
Resources for Independent Living Inc. and Central Virginia Resource Corporation	Disability Agency
Senior Connections	AAA
OAR	Reentry
OAR	Reentry
Partnership for Housing Affordability	CP
Capital Region Workforce	Public Agencies

Department of Veteran Services	Vets
Hanover DSS	CP
Richmond Behavioral Health	HSP, Public Agencies
HOME	Fair Housing
HOME	Fair Housing
Housing Resource Line	CP
Resources for Independent Living Inc. and Central Virginia Resource Corporation	Disability Agency
Senior Connections	AAA
Virginia Boys and Girls Home	HSP, CP
Virginia Boys and Girls Home	HSP, CP
Chesterfield County Public Schools	Public Agencies
Chesterfield Social Services	Public Agencies
Chesterfield Social Services	Public Agencies
Chesterfield Social Services	Public Agencies
Chesterfield Citizen Information and Resources	Public Agencies
Chesterfield Citizen Information and Resources	Public Agencies
Chesterfield Mental Health Support Services	Public Agencies
Chesterfield Mental Health Support Services	Public Agencies
Chesterfield Mental Health Support Services	Public Agencies
Chesterfield Community Engagement police officers	CP
Henrico Mental Health and Development Services	Public Agencies
Henrico County Public Schools	Public Agencies
Henrico Mental Health and Development Services	Public Agencies
Henrico Mental Health and Development Services	Public Agencies
Henrico Social Services	Public Agencies
Henrico Social Services	Public Agencies
Henrico Social Services	Public Agencies
Henrico Social Services	Public Agencies
RRHA	PHA

# Appendix F: Definition of a Preference, Referral Methods, and Limitation per CPD Notice 21-10

## Preferences

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

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

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

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

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and

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

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

## Referral Methods

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

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

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

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

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless,

etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

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

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

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

## Certifications and SF 424

This section will be updated after the March 14, 2023, Board of Supervisors meeting.