

HOME-ARP Allocation Plan Template

Guidance

- To receive its HOME-ARP allocation, a PJ must:
 - Engage in consultation with at least the required organizations;
 - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further Fair Housing;
 - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - Anti-Lobbying;
 - Authority of Jurisdiction;
 - Section 3; and,
 - HOME-ARP specific certification.

Participating Jurisdiction: City of Seattle

Date: 11/9/2021

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and 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, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

Seattle Office of Housing conducted individual outreach to the organizations listed below specifically to discuss the best use of HOME-ARP funds.

The Consolidated Plan relies on multiple planning efforts from a variety of sources to inform the

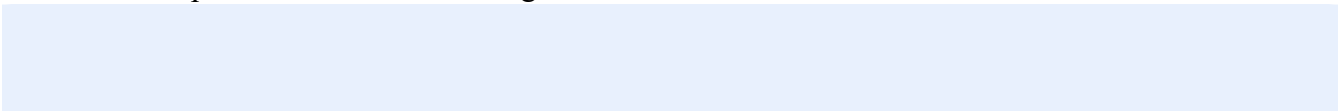
allocations of the Consolidated Plan funds. The consultation process illustrates how HUD funds are part of a much larger funding picture for housing, human services, and community development in the City of Seattle. Through the Area Agency on Aging, King County Regional Homelessness Authority, Seattle/King County Continuum of Care, the Mayor’s Emergency Task Force on Unsheltered Homelessness, the City’s Housing Affordability and Livability Advisory (HALA) Committee, Seattle 2035 Comprehensive Plan Update, the City’s planning efforts inform changes and updates to our homelessness prevention and service system, while providing key opportunities for consultation and public input. In addition, the City’s 2021 Adopted (first year of biennial budget) and 2022 Proposed Budget include significant general public input and discussion to shape policy and budget priorities. The budget is passed by City Council in November each year. A draft of the Substantial Amendment to the 2021 Annual Action Plan was publicized and made available for public comment for a 15- day public comment period beginning November 5, 2021, and the first notice of public hearing was posted October 23, 2021.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
King County Regional Homelessness Authority	Continuum of Care	Meetings to align housing investments with other resources to serve people experiencing homelessness and align with CoC goals to serve people experiencing homelessness with Emergency Housing Vouchers.	Coordination and strategy for HOME-ARP funds to be deployed alongside efforts to utilize Emergency Housing Vouchers.
Low Income Housing Institute, Chief Seattle Club, SeaMar, Pioneer Human Services, Plymouth Housing, YWCA, El Centro de la Raza, DESC, Catholic Housing Services	Homeless Service Provider	Individual meetings with homeless service providers to discuss potential future projects.	Homeless service and housing providers have worked at the highest intensity level during the COVID-19 pandemic. They have taken on significantly more work, and want to do more to contribute to ending homelessness in our community. They ask that government funders streamline requirements and reduce barriers wherever possible. YWCA and DESC requested new construction to match their clients’ needs.

			Some concern shared about Qualified Populations and referral process.
Chief Seattle Club; YWCA; Mayor's Office on Domestic Violence and Sexual Assault	Domestic Violence Service Provider	Individual meetings with each of these groups. Also attended Mayor's domestic violence stakeholder committee.	General support for more permanent housing and considering ways to coordinate across offices to benefit people who have experienced DV/SA.
Catholic Community Services; VA and PHA's VASH coordination	Veterans' Groups	Individual outreach from Office of Housing	None.
Seattle Housing Authority	Public Housing Agency	In addition to regular coordination meetings, we have been meeting with SHA for several months about coordination of new federal housing investments.	Excited to partner Emergency Housing Vouchers with HOME-ARP projects; supportive of affordable housing investments in the City of Seattle.
King County, State of Washington, WSHFC, partnering with state HTF	Public agencies that address the needs of the qualifying populations	Monthly meeting	Coordinating funding programs to achieve maximum impact and leverage. King County and Washington State are both developing HOME-ARP plans concurrently.
Office of Civil Rights	Fair Housing Organization	Individual outreach from Office of Housing	None.
Office of Civil Rights, ACLU	Civil Rights Organization	Individual outreach from Office of Housing	None.

If additional space is needed, insert image of table here:



Public Participation

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

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive,
- 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:

- ***Public comment period: start date - 10/23/2021 end date - 12/7/2021***
- ***Public hearing: 12/7/2021***

On November 9, 2021 the Seattle Office of Housing hosted a public hearing on the HOME-ARP Allocation Plan. Laurie Olson, Capital Investments Manager presented the amount of HOME-ARP City of Seattle will receive; \$12,200,684 and stated that the planned range of activities include the acquisition, rehabilitation, construction, and/or preservation of multifamily rental housing to serve Qualified Populations.

Describe any efforts to broaden public participation:

The City is providing an extended period for public comment, and two public hearings; first in the November 9 public comment hearing presented by Office of Housing, and second in a City Council meeting. Council must approve the substantial amendment before its submission to HUD.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

Sharon Lee, Executive Director Low Income Housing Institute (LIHI) stated that LIHI is happy these funds are being made available and wishes it were more than \$12M. LIHI believes there are opportunities to acquire buildings, especially brand new buildings, for permanent supportive housing and they encourage OH to use the dollars for this purpose as the most efficient way to house people experiencing homelessness. The highest priority should be for purchasing existing buildings to serve people experiencing homelessness and people who are Black or Indigenous, and people of color. There might also be some opportunities for preservation of existing housing, especially in areas experiencing displacement. Sharon also asked whether these funds are part of

the 2022 budget that City Council is considering now. Laurie Olson replied that these funds are included in the 2021 budget and should be available after approvals. The City also concurs with the use and prioritization of funds suggested by LIHI.

Derrick Belgarde, Executive Director of the Chief Seattle Club stated that they support the City's stewardship of the \$12.2M award. He stated that the City's support has been instrumental for Chief Seattle Club to create housing and shelter focused on serving Indigenous people, who are very over-represented in Seattle's homeless population. Chief Seattle Club supports the City's intentions with HOME-ARP Funds.

Kimberly Arrington White, Chief Supportive Housing Officer, Plymouth Housing stated that they are currently struggling to increase wages to retain quality staff to serve residents. They have 48 vacancies out of 200 some service staff. Laurie Olson responded that the City Office of Housing acknowledges these staffing difficulties and stands behind Plymouth in its attempts to address the issue.

The hearing was also attended by Karen Peterson, Kelli Larsen, and Jamie Madden.

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

n/a

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of 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. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	1696	436	3119	#	75								
Transitional Housing	1522	430	577	#	107								
Permanent Supportive Housing	1280	425	4969	#	1540								
Other Permanent Housing						1328	403	21	#				
Sheltered Homeless						1171	3967	342	#				
Unsheltered Homeless						1309	4368	502	#				
Current Gap										#	#	#	#

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

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	193101 city		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	8161city		
Rental Units Affordable to HH at 50% AMI (Other Populations)	8165 city		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		60445 county	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		44710 county	
Current Gaps			29,710 city

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

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

According to the 2020 Point in Time Count, 11,751 individuals in Seattle/King County were experiencing homelessness 72% of whom were staying in the City of Seattle. Roughly half are unsheltered, with the 2020 count reporting that 47% of those experiencing homelessness were living without shelter.

Compared to the overall population of Seattle/King County, homelessness disproportionately impacts people of color. Black/African Americans (7% of the general population; 25% of population experiencing homelessness), American Indian/Alaska Native (1% of the general population; 15% of population experiencing homelessness), Native Hawaiian/Other Pacific Islander (1% of the general population; 4% of population experiencing homelessness) experience disproportionately higher rates of homelessness according to the 2020 count. Additionally, compared to the Seattle/King County general population, homelessness disproportionately affects Hispanic/Latinx individuals (of any race). Seattle/King County is comprised of 10% Hispanic/Latinx individuals, yet 15% of individuals experiencing homelessness in 2020 identify as Hispanic/Latinx.

From 2017-2020, males experience higher rates of homelessness compared to female, transgender, and gender non-conforming groups. However, the rate of females experiencing homelessness has continued to increase since 2018 to 41% of the 2020 count.

1,190 Families with Children representing 3,743 adults and children were experiencing homelessness on the early morning of January 24, 2020. Of these, approximately 100 families (comprised of 251 individuals) are from youth parenting households. Approximately, 71% of individuals in families with children were sheltered, and 29% were unsheltered.

1,211 individuals experiencing homelessness were fleeing from domestic violence in 2020. This is about 10% of the total homeless population and an increase of about 700 individuals from 2019. Domestic violence includes dating violence, sexual assault, and/or stalking. About 69% of domestic violence survivors/victims are unsheltered and 15% have children with them.

813 veterans were experiencing homelessness on the morning of the count. Approximately 51% were sheltered and 49% were unsheltered. Since 2017, there has been a decline in veterans experiencing homelessness.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness;***
and,
- ***Those at greatest risk of housing instability or in unstable housing situations:***

As reported in the most recent Point in Time Count, Seattle is home to approximately 4,400 people experiencing homelessness with shelter, and 3,700 people experiencing homelessness without shelter. It is largely believed that we will see an increased count of people living without shelter as a result of the COVID-19 pandemic, which has negatively impacted thousands of households in Seattle. According to the U.S. Census 2019 ACS 5 year Estimates, 47% of Seattle renter households are cost burdened, paying more than 30% of their income toward rent. The sample size in this ACS Estimate is over 100,000 households. The cost burdens are more serious for households with the lowest incomes (at or below 30% of Area Median Income), with 65% severely cost burdened (paying more than 65% of their income toward rent) and another 17% cost burdened (paying more than 50% of their income toward rent). These significant housing cost burdens affect over 35,000 Seattle residents, and it is critical that we continue developing and purchasing new affordable housing for people with the lowest incomes in our community. The Regional Affordable Housing Task Force reported that the majority of King County residents living with cost burdens have incomes below 50% of Area Median Income, are disproportionately people of color, and are more often older adults (65 or older) or younger adults (25 or younger). As these numbers demonstrate, Seattle requires thousands of affordable homes to adequately house members of the Qualifying Populations. The City of Seattle is rapidly expanding Permanent Supportive Housing and permanently affordable housing in response to these unmet needs.

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:

A 2021 Seattle City Council study on shelter capacity found 2,349 permanent shelter beds, with an additional 286 temporary and 215 planned. The pandemic required reductions in shelter capacity to increase social distancing in shelter programs. The 2021 Adopted Budget included \$18 million of Emergency Solutions Grant (ESG) COVID funds to pilot the use of hotels for shelter. Those funds led to the creation of 197 temporary shelter spaces at the King's Inn and Executive Hotel Pacific by April 2021. Combined with the reopening of some shelter beds and the expansion funded for 2020, total capacity reached 2,436 beds by July 2021, an increase of 152 beds compared to the end of 2019 (see Chart 1). Other acquisitions, such as the new shelter operated by Africatown Land Trust in The Community Home at Keiro, will add permanent shelter capacity for the City, bringing permanent shelter capacity to 2,564.

Seattle Housing Authority received authority for 500 Emergency Housing Vouchers, and approximately 250 may be paired with HOME-ARP and related projects addressing the needs of Qualified Populations.

Affordable and permanent supportive housing developments in Seattle have long wait lists and typically conduct lotteries for affordable units or lease units to Qualified Populations through Coordinated Entry for All. Coordinated Entry generally assesses thousands of people each year, and offers housing to a small fraction. There are at least 8,000 people experiencing homelessness

and tens of thousands of cost burdened renters in Seattle – additional affordable and permanent supportive housing is desperately needed.

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

The serious deficit of homes affordable and available to the qualified populations is both the root cause of the problem, as well as a massive hinderance to strategies focused on connecting qualified populations to housing and shelter. Additionally, Seattle relied heavily on congregate shelter prior to COVID, and roughly half of our neighbors experiencing homelessness are unsheltered. In response to the pandemic, the shelter and housing ecosystem in Seattle/King County has been attempting to rapidly expand Permanent Supportive Housing and non-congregate shelter options, including through opportunistic acquisitions of existing multifamily buildings, hotels, and motels.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

Living in over-crowded housing and staying with friends or family are often the form of housing instability that can escalate to staying in a car, tent, or shelter.

Identify priority needs for qualifying populations:

People without homes need homes. High and rapidly escalating housing costs combined with rapid economic displacement in Seattle create harmful instability for the qualified populations. It is difficult for members of qualified populations to find affordable housing of any kind in Seattle. Whatever personal needs or challenges they were facing become exponentially worse on the streets, adding trauma and stress to individuals surviving outside, and further overwhelming the system of programs and providers.

According to the 2020 Point in Time Count, 94% of all individuals experiencing homelessness reported they would move inside safe/affordable housing if available; 21% are employed; and 40% reported economic reasons including job loss, inability to afford rent, eviction, or foreclosure as the primary reason for experiencing homelessness. The top three most used services by individuals experiencing homelessness are: Free meals (58%) Bus passes (41%) Hygiene services (40%). When asked about issues while trying to access services, the most common issues were: Lack of transportation to access a service (29%); Not having an ID or personal document needed to receive a service (29%); Not knowing where to go for help (28%); and not hearing back after applying for services (20%) were the most cited issues experienced when attempting to access services. Data and experience show that investing in permanent supportive housing allows services to be accessed and for individuals to begin their own path to recovery. Without safe, quality, affordable housing, our qualified populations are unable to thrive.

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

A significant evidence base, data, and experience demonstrate that investing in permanent supportive housing allows services to be accessed and for individuals to recover. Without safe, quality, affordable housing, our qualified populations are unable to thrive.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

The PJ will administer activities directly through the City of Seattle Office of Housing. OH will solicit applications through a Notice of Funding Availability and prioritize projects quickly and efficiently to produce permanent supportive housing and permanently affordable housing serving the qualified populations.

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:

n/a

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 12,200,684		
Non-Profit Operating	\$ 0	# %	5%
Non-Profit Capacity Building	\$ 0	# %	5%
Administration and Planning	\$ 0	# %	15%
Total HOME ARP Allocation	\$ 12,200,684		

Additional narrative, if applicable:

Enter narrative response here.

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:

As demonstrated by the data herein as well as in innumerable other reports, the shortage of permanent, affordable, and/or supportive housing options in Seattle is one of the primary causes of homelessness and the primary impediment to helping individuals and families exit homelessness. Accordingly, the plan to fund eligible activities focuses on the acquisition, construction, preservation, and/or rehabilitation of housing serving the Qualified Populations.

HOME-ARP Production Housing Goals

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

165

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:

The Affordable Housing One Year Goals in the 2021 Annual Action Plan were:

AP-55 Affordable Housing – 91.220(g) Introduction

One Year Goals for the Number of Households to be Supported

Homeless 254

Non-Homeless 608

Special-Needs 109

Total 971

One Year Goals for the Number of Households Supported Through

Rental Assistance 340

The Production of New Units 47

Rehab of Existing Units 30

Acquisition of Existing units 417

Total 971

HOME-ARP Funds allow these goals to be increased by 165 new units serving Qualified Populations.

Preferences

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

- 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).
- PJs are not required to describe specific projects to which the preferences will apply.

There will be no additional preferences. Working with the King County Regional Homelessness Authority, Seattle Housing Authority, and community housing partners, projects funded by these HOME-ARP dollars will use project-specific affirmative marketing and waitlists, and they will serve Qualified Populations by utilizing Coordinated Entry for All to enroll households with Emergency Housing Vouchers.

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 category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

n/a

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

n/a

HOME-ARP Refinancing Guidelines

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

The City does not have any plans to refinance existing debt secured by multifamily housing as described in the question, and therefore we do not have any refinancing guidelines for that 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.***

n/a

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

n/a

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

n/a

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

n/a

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

n/a