

City of Fort Lauderdale HOME-ARP Allocation Plan

Participating Jurisdiction: Fort Lauderdale

Date: May 17, 2022.

Background

The American Rescue Plan appropriated \$5 billion to help communities by providing housing, shelter, and services for people experiencing homelessness and other qualifying populations through the HOME Investment Partnerships Program (HOME Program). This one-time funding creates a significant opportunity to meet the housing and service needs of our community's most vulnerable populations.

On April 28, 2021, the City was awarded FY 2021 HOME-ARP funds in the amount of \$2,589,019. These funds must be used for qualifying individuals or families with the following criteria: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability; and veterans and families that include a veteran family member that meet one of the preceding criteria.

HOME-ARP funds can be used for four eligible activities including :

- Development and support of affordable housing
- Tenant-based rental assistance
- Provision of supportive services
- Acquisition and development of non-congregate shelter units

The Housing and Community Development Division of the City Manager's office is responsible for the administration of HOME-ARP. They will be responsible for full administration and oversight of activities carried out by sub recipients. Operating funds provided to non-profits carrying out activities shall not exceed the 5% allowable under the HOME-ARP regulations .

In accordance with the regulations governing the HOME-ARP program funds must be used to benefit a Qualifying Population (QP). There are four eligible QPs.

1. Homeless as defined in 24 CFR 91.5 – (1), (2), (3)
2. At Risk for Homelessness (24 CFR 91.5)
3. Fleeing/Attempting to Flee Domestic violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking ,as defined by HUD.
4. Other Populations (Other families requiring services or housing assistance to prevent homelessness that do not qualify under any of the populations in 1-3)

Consultation

Describe the consultation process including methods used and dates of consultation

The City hosted three public meetings to get input from community member and stakeholders. The meetings were held in a hybrid format that allowed participants to attend virtually or in person. Following the January 10th public meeting the City disseminated a community partner survey to collect documented input from the required consultation group as well as other stakeholders. The required consultation group includes

- :
 - Broward County Continuum of Care
 - Homeless Service Providers (Salvation Army, Broward Partnership for the Homeless, and Hope South Florida)
 - Domestic Violence Shelter (Women In Distress)
 - Veterans Group (Broward Regional Health Planning Council)
 - Public Housing Agency . (Fort Lauderdale Housing Authority)
 - Public Agencies that address the needs of qualifying Population (Broward County CoC, HOMES, Inc, Oasis of Hope CDC)
 - Public or Private Organization that address fair Housing and Civil Rights(Housing Opportunity Project for Excellence dba HOPE Fair Housing

A link to the survey was sent to thirty-three (33) community members and stakeholder organizations and follow-up surveys were sent to nonresponsive stakeholders It was made available on the City’s website for completion by the general public. The survey responses received by the City are summarized below.

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

<https://www.fortlauderdale.gov/government/departments-a-h/city-manager-s-office/housing-and-community-development/home-arp-funding-needs-survey>

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Broward County	Government Continuum of Care	Survey	Production of Affordable Housing is the highest homeless priority and preservation of affordable housing is the 2 nd highest priority. Families are the population with highest need.
Fort Lauderdale Housing Authority	PHA	Survey	Supportive Services are the highest homeless priority with purchase and/or development of Non-Congregate Shelter as the 2 nd highest priority. Single adult population has the highest need.
Broward Regional Health Planning Council	Private not-for-profit associated with the Health Department serving veterans and persons with special needs	Survey	Production of Affordable Housing is highest priority and tenant-based rental is the 2 nd highest priority. Unaccompanied Youth population has the highest need.
HOMES Inc.	Community Housing Development Organization (CHDO)	Survey	Production of Affordable Housing is highest homeless priority and preservation of affordable housing 2 nd highest priority. Unaccompanied Youth population has highest need.
Volunteers of America Florida	Nonprofit organization	Survey	Preservation of Affordable Housing is highest homeless priority and Supportive Services,

	Homeless prevention Services for veterans and families		Homeless Prevention Services and Housing Counseling is the 2 nd highest priority. Single adults' population has highest need.
HOPE South Florida-COO	Nonprofit organization serving the homeless.	Survey	Tenant-based rental assistance is highest homeless priority and Supportive Services, Homeless Prevention Services and Housing Counseling is the 2 nd highest priority. Families are the population with highest need.
HOPE South Florida-Sr Director of Prevention	Nonprofit organization providers of shelter bed for the homeless	Survey	Production of Affordable Housing is the highest homeless priority and Supportive Services, Homeless Prevention Services and Housing Counseling is the 2 nd highest priority. Families are the population with highest need.
Habitat for Humanity of Broward	Nonprofit organization Providers of Affordable Housing home ownership options	Survey	Supportive Services, Homeless Prevention Services and Housing Counseling are the highest homeless priority and purchase and /or development of Non-Congregate Shelter is the 2 nd highest priority. Families are the population with highest need.
Oasis of HOPE CDC	Nonprofit organization HUD certified housing counselor	Survey	Production of Affordable Housing is the highest homeless priority and purchase and/or development of Non-Congregate Shelter is the 2 nd highest priority. Families are the population with highest need.
Salvation Army of Broward County	Nonprofit Organization Homeless Shelter provider	Survey	Supportive Services is the highest homeless priority with purchase and/or development of Non-Congregate shelter as the 2 nd highest priority. Single adults' population has highest need.
Broward County CoC	Continuum of Care Transitional Housing Provider	Survey	Production of Affordable Housing was given the highest priority, supportive services and homeless prevention was ranked second, followed by perseveration of affordable housing and tenant based rental assistance .
Private affordable Housing Developer	Affordable Housing Developer		No response
Agency for Persons with Disabilities	Nonprofit Organization serving person with Disability	Survey	Preservation of Affordable Housing is the highest homeless priority with production of Affordable Housing as the 2 nd highest priority. Unaccompanied Youth population is the population with the highest need.
Women In Distress.	Domestic Violence Shelter	Survey	Production of Affordable Housing is the highest homeless priority with Supportive Services as the 2 nd highest priority. Victims of Domestic Violence is the population with the highest need.
Housing Opportunity Project for Excellence	Fair Housing and Civil Rights Council	Presenter on January 10 th public meeting	Provided Fair Housing Education
Mission United	Veterans Housing Program	N/A	Provided homeless veterans Data by Email

Public Participation

It is the policy of the City of Fort Lauderdale, that no person shall be subjected to discrimination based on race, color, religion, gender (including identity or expression), marital status, sexual orientation, national origin, age, disability or any other protected classification as defined by applicable law. The City provided contact information for persons needing Auxiliary Aids and services with instruction on how to

activate the needed services. Notices made available on the City website can be converted to any desired language for residents with Limited English Proficiency (LEP).

Three (3) public engagement meetings with Zoom and in-person were held on July 9, 2021, November 30th, 2021, and January 10th, 2022. The agenda was to identify greatest housing needs, review HOME-ARP eligible activities, and determine the best use of HOME-ARP funding in the community. During the meeting held on January 10th, Housing Opportunities Project for Excellence, Inc, dba HOPE Fair Housing, presented on fair housing, associated civil rights. Information provided is attached in these submissions and titled Fair Housing and Civil Rights.

During the public meeting, the City's Housing and Community Development staff discussed the HOME-ARP Program, funding amount, and eligible uses. Comments were received from several partners at the July 9, 2021, in-person meeting as follows:

Marcia Barry-Smith, representing Habitat for Humanity of Broward, stated that this agency has initial, periodic, and long-term goals. They hope to fund Habitat for Humanity's Financial Intelligence Institute, which provides financial education for those affected by the COVID-19 pandemic as well as before. The program will have all the features of regular homebuyer education: however, they will also help those impacted by credit report issues that occurred in relation to the pandemic. She emphasized that this would help clients become first-generation homeowners.

Justine Morgan, also representing Habitat for Humanity of Broward, strongly emphasized that funding should be used for long-term sustainable projects. Prior to the COVID-19 pandemic, Fort Lauderdale was already in need of affordable housing options, which have been exacerbated due to the pandemic as well as market fluctuations.

Steve Werthman, representing HOPE South Florida, stated that this agency has partnered with the city of Hollywood since 2011 to use HOME funds for tenant-based rental assistance. These vouchers are part of the rapid re-housing model, which is 80% effective in keeping families and individuals housed for at least six months after assistance ends.

Mr. Werthman noted that supportive services are also needed. HOPE South Florida optimally provides one case manager for every 20 households served. They also work toward homelessness prevention and invested roughly \$3 million in these services from June through December 2020. These included rental and utility assistance for households affected by COVID-19. The organization was both audited and monitored following these efforts, with no findings or concerns.

The public notice for the HOME-ARP Allocation Plan was published in the Sun Sentinel on June 24, 2021, for a period of 15 calendar days. Information about the need was also disseminated via the City's social media platforms.

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

The City held several public meetings and solicited input from over 30 stakeholders prior to developing the plan as such there were no comments or recommendations not accepted during the public hearing to evaluate the plan.

Needs Assessment and Gaps Analysis

The City’s Housing and Community Development (HCD) division utilized two sources of data to identify the needs in the City. The data source was the Continuum of Care’s homeless Point In Time (PIT) count. The second was a survey poll of social services agencies and other stakeholder who currently provide services to the HOME-ARP defined qualifying population.

HCD evaluated the size and demographic composition of qualifying populations within its current shelter by using data that was available for the Broward County Continuum of Care most recent Point In Time (PIT) count. The results of the PIT cut identified 1767 out of 2,561 persons experiencing homelessness were unsheltered. Of that unsheltered population, 703 were in the city limits of fort Lauderdale. The result of the PIT count can be found at:

<https://www.broward.org/Homeless/Pages/PIT.aspx>

Victims of Domestic Violence in City limits counted as sheltered homeless 134

Public housing waitlisted due to unavailable vouchers 27

Homeless unaccompanied youths in transitional housing 16

Veterans to be housed 193

Other homeless in the City limits 703

There is the possibility that the data count is duplicative. The 703 unsheltered homeless data count in the City limits is reflective of the 2021 Point in Time (PIT) conducted by the CoC. The other data provided by the provider agencies may be include in the 703 being reported by the from the PIT Count. .

OPTIONAL Homeless Needs Inventory and Gap Analysis Table County wide

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	#289	#64	#614	#	# 0								
Transitional Housing	#154	#50	# 229	#	#45								
Permanent Supportive Housing	#194	#62	#704	#	#8								
Other Permanent Housing						#	#	#	#				
Sheltered Homeless						#794	#	46#	#				
Unsheltered Homeless						# 1767	#	147#	#				
Current Gap										281	60	#422	

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation Data for 2021

In a recent study conducted by the Florida International University Metropolitan Center for the completion of the City's 2020-2024 Consolidated Plan for the US Department of Housing and Urban Development (HUD), there was an increase of 3 % in the City Housing inventory. However, there was a 5% increase in the City's population for the same time period.

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

The City of Fort Lauderdale experienced a recent increase in its homeless population which may be directly attributed to the COVID-19 pandemic and associated economic shift. The data provided in the Homeless Needs Inventory and Gap analysis table was obtained from the Broward County Continuum of Care Point In Time (PIT) count conducted in 2021. Of the 1767 unsheltered homeless, approximately 703 are experiencing homelessness within the city limits of Fort Lauderdale. The highest area of need has been identified as homelessness. Along with the data available via the Continuum of Care (CoC) 2021 Point In Time (PIT) and Housing Inventory Count (HIC), the City conducted survey of stakeholders and service providers in the City. While the response rate was less than 50%, all respondents indicated that homelessness and associated services were of greatest need. The needs ranged from production of affordable housing, development of non-congregate shelter, development of housing for unaccompanied youth.

Demographic data was unavailable for the unsheltered population. Data available for homeless persons residing in emergency shelters or transitional housing indicated that youths ages 18-24 represented 6.4% of the population, single person over age 24 represented 52.14 % of the population, and households with at least one adult and one child accounted for the remainder of the sheltered population. Females represented 41.7% of the sheltered population, Males represented 57.8% and Transgender and Gender Non-Conforming represented 0.52%

Demographic of QP listed above:

1. Persons fleeing Domestic Violence

Of the 134-household fleeing domestic violence in temporary shelter 72% were females and 28 were males 34% were children ranging from 0-12 years old and 1% above the age of 60. The average length of Stay per person /household was 57 nights

2. Veterans : Data provided by Mission United indicated there were 193 veterans 46 of whom were in temporary shelter and 147 unsheltered. The 147 unsheltered veterans are included in the unsheltered PIT count data recorded in the table above.

3. Other homeless residing in temporary shelter

Data available for homeless persons residing in emergency shelters or transitional housing indicated that youths ages 18-24 represented 6.4% of the population, single person over age 24 represented 52.14 % of the population, and households with at least one adult and one child accounted for the

remainder of the sheltered population. Females represented 41.7% of the sheltered population, Males represented 57.8% and Transgender and Gender Non-Conforming represented 0.52%

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

Findings from the data analysis and the survey shows that there are over 1700 persons that are unsheltered homeless. The survey results from current providers and stake holders identify the need for shelter for single persons, unaccompanied youth, and rent support for seniors on a fixed income. Based on a follow up conversation with a service provider and a high volume of calls received by our office, senior citizens on a fixed income are at high risk for homelessness as the cost of rent continues to skyrocket in Fort Lauderdale as well as the surrounding metro area.

Broward County Continuum of Care Point In Time (PIT) count conducted in 2021. Of the 1767 unsheltered homeless approximately 703 are experiencing homelessness within the city limits of Fort Lauderdale. While the demographic composition is unknown, it is evident from the number of unsheltered household that there is a need for expanded shelter capacity.

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

The City supports a variety of services for the qualifying populations. The City provides Community Development Block Grant Public Service funding to support housing for unaccompanied youth aging out of foster care, domestic violence shelter, homeless assistance center. The City serves as the Administrator for the County Housing Opportunities for Persons with AIDS (HOPWA) program. This program provides a variety of housing and related support services for household impacted by HIV. HOME Investment Partnerships TBRA funds are used to provide rental assistance for homeless persons combined with general revenue funds for case management. As an entitlement jurisdiction, the City receives, State Housing Initiatives Partnerships (SHIP), Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) funding to promote affordable housing and homelessness. The City receives over nine million dollars annually in combined entitlement funding and 90% is used to support the preservation and, development of affordable housing through programs such as Minor home repair, Purchase assistance and Community Housing Development Organization (CHDO) activities.

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

In a survey response for the largest homeless shelter provider in the City Limits, Salvation Army, non-congregate shelter for single adults is the greatest need. Support services for this population is also a co-existing need as many suffer from either substance addiction or mental health challenges. There has been a steady growth in the number of seniors experiencing homelessness

There are single adult males with co-existing conditions, i.e., mental health and substance abuse issues. Amongst the seniors experiencing homelessness are seniors on a fixed income who have been priced out of the housing market as well as those challenged with other conditions.

The results of the data from the PIT count indicate that there is a significant gap in available shelter beds. The PIT revealed that there were over 2500 homeless persons and more than 68 % were unsheltered. Of those unsheltered, 41% were experiencing homelessness in the city limits.

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:

HCD conducted a survey of non-profits currently providing services to the qualified populations defined in the HOME-ARP notice. Of the eleven respondents, 4 indicated that homeless families ranked highest, followed by single adults and the unaccompanied youth. In follow up conversations to the survey, providers indicated that it was challenging to house a homeless family for several reasons which ranged from inadequate shelter bed to the prohibitive prove of rent on the open market. The challenge seen with the single adult population is that there is typically a co-existing condition such as substance abuse or mental illness.

Identify priority needs for qualifying populations:

The City’s Commission top priority is Affordable Housing and Homelessness. Affordable Housing and Homelessness have been a long-standing challenge for the City. There are multiple factors that contribute to the continued growth of the homeless population and high rent cost. South Florida experiences warm temperatures all year round and many experiencing homelessness in colder regions tend to migrate south, particularly in Fort Lauderdale and where they usually reside. Secondly, there is a limited number of units available for rent as many landlords find it more lucrative to do short term rentals such as Airbnb. For this reason, expanding the affordable housing inventory is the only way to address some of the existing needs.

Non-congregate shelter that converts to permanent supportive housing is one way to meet the housing needs of single adults that are challenged with mental illness or substance abuse. However, it is important that those at risk for homelessness are provided with support needed to prevent homelessness.

With the limited resources available through HOME-ARP the City will seek to address the needs of those experiencing homelessness, those at risk for homelessness

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:

The need gap was identified using a combination methodology. HCD conducted an analysis of the Broward County CoC 2021 PIT data, the 2007-2021 Annual Homeless Assessment Report (AHAR), and surveying current providers and stakeholders and hosting multiple public meetings.

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 City will use a competitive Request for Proposal (RFP) process with an established ranking criterion. The RFP will be published through Bidsync via the City procurement office. There will be a defined window for submitting and accepting RFPs. Once the bid closes the city will convene a review panel to rank a score applications. To be considered for funding an applicant must score a minimum of 70 points. The final selected applicant will be submitted for City Commission approval.

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:

The City will administer the HOME-ARP grant and will not be allocating administrative funds to a contractor entity.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 100,000.00		
Acquisition and Development of Non--Congregate Shelters	\$750,000.00		
Tenant Based Rental Assistance (TBRA)	\$ 150,000.00		
Development of Affordable Rental Housing	\$ 1,071,215.00		
Non-Profit Operating	\$ 129,450.95	5 %	5%
Administration and Planning	\$ 388,352.85	15%	15%
Total HOME ARP Allocation	\$ 2,589,019.00		

Additional narrative, if applicable:

Should there arise a need for non-profit capacity building, the amount will be deducted from the Administrative and Planning Cap not to exceed 5% of the total grant award.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The AHAR provides data on the Housing Inventory Count (HIC) while the PIT provides a count on the number of individuals experiencing homelessness and the time of the count. On a monthly basis, the City also participate in the CoCs meetings for various sub-populations experiencing homeless. The monthly reports as well as the PIT and HIC data all point to the need for expanding the inventory of

affordable housing. Over 68 % of the homeless population is unsheltered 41% of which are experiencing homelessness in the City limits.

HOME-ARP Production Housing Goals

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

The numbers provided here are minimum projection and will be subject to change based on construction and rent cost. The City will endeavor to partner with entities that are able to leverage other resources to meet the or exceeds the minimum goals established

Affordable Rental Housing for Homeless or those at Risk for Homelessness: **10 units**

Unaccompanied youth / youths aging out of foster care: **10 units**

Non- Congregate Shelter: **6 units**

Assistance to prevent Homelessness for target populations using a Tenant Based Rental Assistance(TBRA) model 3 households for 24 months

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 City will partner with Community Redevelopment Agencies to include certain parcels of vacant land as listed below as part of the RFP process to meet the targeted 16 affordable units identified above. These unit will serve other qualifying as defined by HOME-ARP who are homeless or at risk for homelessness due to inadequate income. Households benefiting from his program must be current residents of the City of Fort Lauderdale or had a Fort Lauderdale address prior to becoming homeless. .

Unaccompanied youths often experience homelessness due to inadequate income. The program through an RFP process will identify a non-profit developer to develop affordable units for rental to this targeted group.

The Salvation Army of Broward currently operates the largest homeless shelter facility the city limits of Fort Lauderdale. The Salvation Army currently owns land and wishes to expand their facility to include non-congregate shelter. The City proposes to partner with the Salvation Army to achieve its goal because of the limited number of opportunities to develop non-congregate shelter.

The City via an RFP process will select at least three non-profit organizations to provide homeless prevention assistance in the form of Tenant Based Rental Assistance or Rehousing Assistance for person meeting the HOME-ARP QP .

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

The City will not establish a preference due to the high demand for affordable housing in the City and surrounding metro-areas.

The City will work with County's CoC and the City's Community Court to refer household experiencing homelessness and meeting the criteria of the four QP for HOME-ARP housing placement based on availability. .

The program was designed with the intention that members of the four qualifying populations will have the opportunity to access some level of service to the extent practicable based on funding availability

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:

The City will establish a preference system via its Request for Proposal(RFP)process. Respondents to the RFPs whose proposal clearly serves the need of a QP will receive extra points based on the ranking system established for the RFP. Each successful RFP respondent will be required to establish a program waitlist and each eligible waitlist applicant will be serve in the order they appear on that list. Language governing how waitlist are established and applicable fair housing requirements will be included in all legal agreements executed with successful respondents to the RFPs.

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:

The City established preference based on feedback from the consultation group. The City considered the feedback form this group as expert as they are on the frontlines serving the QPs Based on feedback received from the consultation group and the regulatory requirements of HOME-ARP the City carefully designed a HOME-ARP program that provides access to all QPs. By offering funding all eligible categories of service to the extent possible. This approach was used to ensure that equitable access was available to the extent practicable to all QPs, Which are as follows :

1. Homeless as defined in 24 CFR 91.5 – (1), (2), (3)
2. At Risk for Homelessness (24 CFR 91.5)
3. Fleeing/Attempting to Flee Domestic violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking ,as defined by HUD.
4. Other Populations (Other families requiring services or housing assistance to prevent homelessness that do not qualify under any of the populations in 1-3)

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***

Not Applicable: The City will not use HOME-ARP funds to refinance existing debt

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

Not Applicable

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

Not Applicable

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

Not Applicable

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

The City will not use HOME-ARP to refinance existing loans

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

Not Applicable