

HOME-ARP Draft Allocation Plan Thomas Jefferson Planning District Region

Consultation

Discussions were held with representatives of:

- CoC(s) serving the Thomas Jefferson region;
- 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.

These consultations occurred either in small groups or one-on-one interviews that covered current programs and services, the number and types of persons served, intake and referrals process, gaps in local homeless services, priority gaps to be addressed, and the differential needs among urban and rural jurisdictions.

Following is the list of consultations with organizations and dates.

Agency/Organization Consulted	Type of Agency/ Organization	Method of Consultation	Date
Albemarle County Housing Dept.	Housing & Policy	Small group discussion	7/1/22
Albemarle County Dept. of Social Services	Social Services	Small group discussion	7/1/22
Albemarle County Victim/Witness Program	Government	Small group discussion	6/28/22
ARC of the Piedmont	Support	Small group discussion	6/30/22
Charlottesville Redevelopment and Housing Authority	Public Housing	Interview	7/22/22
City of Charlottesville Deputy City Manager for Racial Equity, Diversity and Inclusion	Housing & Policy	Small group discussion	7/1/22
City of Charlottesville Deputy City Manager for Operations	Housing & Policy	Interview	7/14/22
City of Charlottesville Dept. of Human Services	Social Services	Small group discussion	7/1/22
City of Charlottesville Dept. of Human Rights	Social Services	Small group discussion	7/1/22
City of Charlottesville Office of Community Solutions	Government	Small group discussion	6/10/22
City of Charlottesville Victim/Witness Program	Government	Small group discussion	6/28/22
The Crossings	Housing	Small group discussion	6/29/22
Fluvanna County Dept. of Social Services	Social Services	Small group discussion	7/1/22
Fluvanna/Louisa Housing Foundation	Housing	Small group discussion	6/29/22
Greene County	Government	Small group discussion	6/29/22
Greene County Dept. of Social Services	Social Services	Small group discussion	7/1/22
The Haven	Support	Small group discussion	7/15/22
Jefferson Area Board for Aging	Support	Interview	7/1/22
Legal Aid Justice Center	Legal Services	Small group discussion	7/7/22
Louisa County Dept. of Social Services	Social Services	Small group discussion	7/1/22

Monticello Area Community Action Agency	Supportive Services	Small group discussion	6/30/22
Nelson County	Government	Small group discussion	7/1/22
Nelson County Community Development Foundation	Housing	Interview	7/12/22
On Our Own	Support	Interview	7/11/22
PACEM	Housing	Interview	7/13/22
Piedmont Housing Authority	Housing	Small group discussion	6/29/22
Premier Circle	Housing	Interview	6/21/22
Region Ten Community Services Board	Support	Interview	8/11/22
Scottsville	Government	Small group discussion	6/29/22
Sexual Assault Resource Agency	Support	Small group discussion	6/30/22
The Shelter for Help in Emergency	Support & Housing	Small group discussion	6/30/22
Skyline CAP	Housing	Small group discussion	6/29/22
Thomas Jefferson Area Coalition for the Homeless	Continuum of Care & Housing	Interview	6/21/22
United Way of Greater Charlottesville	Support	Interview	7/14/22
Veterans Services	Government	Interview	7/21/22
The Women’s Initiative	Support	Small group discussion	6/30/22

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

The communities represented by the TJHC are served by a network of organizations providing housing and services for the homeless, but the capacity of these organizations is very limited relative to the extent of the need. The very high rents and housing shortages throughout the region impact not just the homeless but most low-income households as well, with some rental units being sold and others being renovated for lease through Airbnb. Rental units are particularly limited in the region’s four rural counties, which have typically had minimal multi-family development. The shortage of housing units and landlords willing to accept Housing Choice Vouchers greatly limits recipients’ ability to use those vouchers. Our region also has a shortage of land for new housing, especially so in the City of Charlottesville but also in other TJHC-served counties, as well. In addition, few of the potential sites for development are conveniently located to public services or public transportation and sites in rural counties often present limited access to water and sewer infrastructure.

The inventory of housing for the homeless includes a day shelter, a high-barrier shelter for adult males and females with 63 beds, a low-barrier thermal shelter (24 beds) for 20 weeks per year, 92 units for medically-vulnerable adult males (most of which will not be available after April 2023), 35 units of housing with permanent supportive housing, 102 vouchers with supportive services, 52 hotel rooms, 25 shelter beds for victims of domestic violence, and 6 units of

transitional housing. Efforts are underway to develop another 80 units of supportive housing at the Premier Circle site by 2025, but only 22 vouchers have been secured to date.

Almost all of the inventory is located in Charlottesville and Albemarle County with few, if any, resources in the four rural counties – Fluvanna, Greene, Louisa and Nelson counties. The inventory does not include a low-barrier, year-round shelter, emergency shelter for families, a youth shelter with appropriate supervision, or sufficient transitional housing and resources to support families and individuals in successfully moving out of shelters and achieving housing stability. Some private and government resources exist to prevent imminent homelessness or to help transition a family to permanent housing, but that assistance is typically limited to a single month, which may not be sufficient to prevent future homelessness.

In the rural counties, homelessness can be hard to see. Most homeless families are doubling or tripling up with family or friends, living in sheds or other substandard housing, or living in their cars or tents. Home repair services could help some of those families prevent homelessness.

Homeless individuals with mental illness and/or substance abuse issues are barred from high-barrier shelters, and some are being barred from low-barrier shelters and other services due to behavioral problems. The waiting lists for mental health services are very long, and worker shortages are impacting the treatment capacity of some support organizations, including those supporting persons with developmental disabilities.

Several interviewees noted a need for better communication and coordination among the various service providers. The Housing Management Information System (HMIS) is used extensively by Charlottesville and Albemarle County service providers but not much by potential referral sources in the rural counties.

Key priorities identified by the participants were:

- funding and replacement units for Premier Circle;
- a low-barrier, year-round shelter, including better accommodations for families;
- permanent housing, particularly basic one-bedroom units;
- transitional housing for women and families;
- additional housing counselors and navigation services to work with landlords and households at risk of homelessness;
- housing repair resources for low-income families and seniors living in substandard housing and at risk of homelessness, particularly in the rural counties;
- a shelter for youth with appropriate supervision; and
- transportation funds to help clients access required services.

Public Participation

In accordance with Section V.B of the Notice (page 13), 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.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Template:

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

- ***Date(s) of public notice: 1/18/2023***
- ***Public comment period: start date - 1/18/2023 end date - 2/2/2023***
- ***Date(s) of public hearing: 2/2/2023***

Describe the public participation process:

A public notice was published on the TJPDC’s website on January 18, indicating where members of the public could find the draft allocation plan, and when the public hearing on February 2nd would be taking place, and how to access it. Where necessary, materials were offered in Spanish and Farsi. Advertisements indicating these details were taken out in four newspapers serving the planning district; the Daily Progress, the Nelson County Times, the Greene County Record, and the Central Virginian.

Describe efforts to broaden public participation:

Presentations concerning the HOME-ARP allocation plan were made at 5 of the 6 localities that comprise the HOME Consortium to receive public comment at each jurisdiction’s governing board, as well as to offer opportunities for feedback from elected officials. The 6th locality declined a presentation to their governing board.

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

Enter narrative response here.

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

Enter narrative response here.

Needs Assessment and Gaps Analysis

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	25	44	179										
Transitional Housing		6											
Permanent Supportive Housing			101		34								
Rapid Re-Housing			25		5								
Other Permanent Housing		12	25										
Sheltered Homeless						34	411	47	43				
Unsheltered Homeless							26		5				
Current Gap											10	66	

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

Homeless as defined in 24 CFR 91.5

The Point-in-Time Count for January 2022 identified 437 homeless individuals including 219 individuals in emergency shelters as well as those with vouchers, in hotels, in transitional housing or in Rapid Re-Housing. Of those, 26 were unsheltered. The total count included 72 females, 154 males, and 10 non-binary, questioning or trans-gender persons. Just over 51 percent were White, 45 percent Black, 2 percent of multiple races and 1 percent American Indian, Alaska Native or Indigenous and 1 percent Asian or Asian American. Three percent were Hispanic/Latinx of any race. Fifty-five or almost one-quarter of the homeless individuals qualified as chronically homeless, with 10 of those unsheltered.

Nine homeless households were counted, including seven in emergency shelters and two in transitional housing. These households represented 30 persons, including 20 children under the age of 18. No family households were identified as unsheltered. Fifty-three percent of household members were White, 33 percent were Black and 13 percent were of multiple races. Twenty-three percent identified themselves as Hispanic/Latinx. None were considered chronically homeless. An additional 25 persons were in a domestic violence shelter.

Of the 26 unsheltered adults, 10 had a serious mental illness, 10 had a substance use disorder and five were survivors of domestic violence.

At Risk of Homelessness as defined in 24 CFR 91.5

In 2022, the Continuum of Care worked with 82 individuals across 52 households, of which 15 were households with children, who were within two weeks of being homeless in Fiscal Year 2021. More typically, the average is 90 to 100 individuals per year who are eligible for homeless prevention services.

The Legal Aid Justice Center receives calls for 5 to 10 evictions per month, most often from women of color with one or more children. These households are at elevated risk of being homeless within two weeks.

Throughout the six-jurisdiction region, 105 unlawful detainer eviction cases were on the court dockets for the two-week period from 7/22/22 through 8/4/22. Not all of these cases went to trial, even fewer went to actual evictions, and not all of these households became homeless, but the number gives a sense of scale as to the potential number of households at risk of homelessness.

Five households in the Rapid ReHousing Program will need to find alternative housing this year. The Haven will continue working with them to help them make that transition.

The need for households that meet the definition of at risk of homelessness is estimated at 10 family units.

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

The Point-in-Time Count revealed 48 adult survivors of domestic violence. Shelter for Help in Emergency (SHE), the region's primary shelter for domestic violence victims, reports seeing 200 families per year with an additional 10-15 male victims who are placed in hotels. Another 400 are seen who do not require housing. Sexual Assault Resource Agency (SARA) assists 300 to 400 assault victims annually; those that need shelter are transported to SHE. SARA has seen an uptick in teenagers being sexually trafficked but has no formal statistics. Without an appropriate youth shelter, these individuals often return to their traffickers.

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

The Comprehensive Housing Affordability Strategy (CHAS) data for 2014 to 2018 showed that the region had 4,870 renter households with incomes between 0 and 30 percent of Area Median Income (AMI) and an additional 2,195 households with incomes between 30 and 50 percent of AMI with one or more severe housing problems. These housing problems are defined as spending more than 50 percent of income for gross rent, overcrowding with more than 1.5 persons per room, lack of complete kitchen facilities, and/or lack of complete plumbing facilities. With a 7.9-percent increase in regional population since 2016 coupled with the rapid increase in rents, these counts significantly underestimate the extent of households at great risk of housing instability. The 2014-2018 data indicate a shortage of 7,065 units affordable to households with incomes up to 50 percent of AMI; more than two-thirds of the gap is for households with incomes up to 30 percent of AMI. The gap is larger than might be thought considering the number of rental units affordable to households with incomes at 50 percent of AMI because many of those units are occupied by households that could afford to rent more expensive units but choose not to. Their demand squeezes out lower-income households from many of the units they might be able to afford.

Regional Housing Needs Inventory and Gap Analysis Table - CHAS 2014-2018 Data

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	33,250		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	NA		
Rental Units Affordable to HH at 50% AMI (Other Populations)	5,140		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		4,870	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,195	
<i>Current Gaps</i>			7,065

Shown in the following table by jurisdiction, the gap in the number of units affordable to households with incomes at 50 percent of AMI includes 2,720 units in Charlottesville and 3,050 units in Albemarle County – 82 percent of the regional total. At the 50 percent of AMI level in 2014 to 2018, the housing gaps in Fluvanna, Greene and Nelson counties were more modest due to greater affordability with 195 to 245 households with severe housing problems. Louisa’s housing problems were more extensive with 620 households experiencing severe housing problems.

Housing Needs Inventory and Gap Analysis by Jurisdiction Table - CHAS 2014-2018 Data

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Charlottesville			
Total Rental Units	10,570		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	NA		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,335		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		2,170	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		550	
Current Gaps			2,720
Albemarle County			
Total Rental Units	15,220		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	NA		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,620		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		1,815	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,235	
Current Gaps			3,050

**Housing Needs Inventory and Gap Analysis by Jurisdiction Table - CHAS 2014-2018 Data
(Continued)**

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Fluvanna County			
Total Rental Units	1,585		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	NA		
Rental Units Affordable to HH at 50% AMI (Other Populations)	345		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		195	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		50	
Current Gaps			245
Greene County			
Total Rental Units	1,460		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	NA		
Rental Units Affordable to HH at 50% AMI (Other Populations)	430		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		75	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		120	
Current Gaps			195

**Housing Needs Inventory and Gap Analysis by Jurisdiction Table - CHAS 2014-2018 Data
(Continued)**

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Louisa County			
Total Rental Units	2,755		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	NA		
Rental Units Affordable to HH at 50% AMI (Other Populations)	610		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		410	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		210	
Current Gaps			620
Nelson County			
Total Rental Units	1,660		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	NA		
Rental Units Affordable to HH at 50% AMI (Other Populations)	800		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		205	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		30	
Current Gaps			235

A related indicator of the need for housing assistance is the extent of poverty in the region. Summarized in the following table, the region had almost 27,000 people living below the poverty level in 2016-2020, a rate of 11.2 percent. Among Black or African American residents, the rate

reached 18.5 percent. With almost 3,100 families living below the poverty level, the percentage was lower at 4.9 percent of all families. Just under 40 percent of the families living below the poverty level were headed by Black or African American persons – 17.1 percent of those families.

Population and Families Below the Poverty Level by Race, 2016-2020						
Jurisdiction	Population			Families		
	Total	Number Below Poverty Level	Percent Below Poverty Level	Total	Number Below Poverty Level	Percent Below Poverty Level
All Races						
Charlottesville	44,552	10,290	23.1%	8,950	304	3.4%
Albemarle County	101,147	7,753	7.7%	26,522	955	3.6%
Fluvanna County	25,308	1,199	4.7%	7,131	200	2.8%
Greene County	19,615	1,922	9.8%	5,372	381	7.1%
Louisa County	36,372	4,136	11.4%	10,249	861	8.4%
Nelson County	14,720	1,687	11.5%	4,372	380	8.7%
Total Region	241,714	26,987	11.2%	62,596	3,081	4.9%
Householder - White Alone						
Charlottesville	44,552	6,271	20.0%	6,616	357	5.4%
Albemarle County	83,115	5,698	6.9%	22,484	652	2.9%
Fluvanna County	20,233	603	3.0%	6,164	111	1.8%
Greene County	16,273	1,025	6.3%	4,761	238	5.0%
Louisa County	28,929	2,394	8.3%	8,439	506	6.0%
Nelson County	12,461	1,232	9.9%	3,709	234	6.3%
Total Region	205,563	17,223	8.4%	52,173	2,098	4.0%
Householder - Black or African American Alone						
Charlottesville	8,391	2,096	25.0%	1,745	471	27.0%
Albemarle County	8,937	1,213	13.6%	2,183	212	9.7%
Fluvanna County	3,482	285	8.2%	790	56	7.1%
Greene County	1,498	202	13.5%	370	92	24.9%
Louisa County	5,164	1,226	23.7%	1,482	249	16.8%
Nelson County	1,932	420	21.7%	614	146	23.8%
Total Region	29,404	5,442	18.5%	7,184	1,226	17.1%
Source: American Community Survey, 2016-2020.						

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

For emergency shelter, the inventory at the January Point-in-Time Count included:

- Albemarle County Department of Social Services – 14 hotel vouchers for homeless families;
- Albemarle County Schools Families in Crisis – five emergency vouchers for homeless families;
- PACEM – 24 thermal shelter beds available 20 weeks of the year;
- Salvation Army shelter – 63 year-round beds and 14 overflow beds;
- Thomas Jefferson Area Coalition for the Homeless – 86 of the 92 beds at Premier Circle for medically vulnerable individuals (most of which will be gone in April 2023) plus 33 hotel vouchers, which are no longer funded; and
- The Shelter for Help in Emergency domestic violence shelter – 25 beds for women and children from across the region who are fleeing domestic violence or sexual assault as well as hotel rooms for male survivors and women and children when they first access SHE services.

Transitional housing is limited to:

- The Shelter for Help in Emergency domestic violence shelter – two units (six beds) for women with children; and
- Monticello Area Community Action Agency (MACAA) – four units for families investing in transformational change to work their way out of poverty.

Permanent supportive housing includes:

- McGuire VA Medical Center provides supportive services to 34 veterans with vouchers under the Veterans Affairs Supportive Housing (VASH) program;
- Region Ten Community Services Board – 38 vouchers for permanent supportive housing for persons with mental health;
- Thomas Jefferson Health District – 28 vouchers for persons with HIV/AIDS; and
- Virginia Supportive Housing – 35 beds at The Crossings.

The Rapid Re-Housing Program includes:

- The Haven manages 25 housing vouchers for homeless individuals; and
- Virginia Supportive Housing – five vouchers for veterans’ families under the Supportive Services for Veterans Families (SSVF) program funded by the U.S. Department of Veterans Affairs.

Other permanent housing is provided by:

- Charlottesville Redevelopment and Housing Authority (CRHA) – 12 Emergency Housing Vouchers (now 15 vouchers); and

- Region Ten Community Services Board – 25 vouchers for individuals with severe mental illnesses under Virginia Department of Behavioral and Developmental Services programs.
- Nelson County Community Development Foundation – 16 Emergency Housing Vouchers

The 2014-2018 CHAS data indicated a total of 5,140 rental housing units affordable to households with incomes up to 50 percent of AMI.

Since 2016, CoStar, a national real estate data firm, reports that the average multi-family unit rent in the Thomas Jefferson region increased by 26.9 percent from \$1,217 in 2016 to \$1,544 in mid-2022. CoStar’s database includes 15,529 rental units in 236 developments ranging in size from 1 to 468 units. Rent data are available for 128 developments with 12,432 units – 80 percent of the total units. Among the developments which provided rent development, the number of developments with average unit rents affordable to low-income households in June 2022 are as follows:

Number of Multi-Family Rental Developments with Rents Affordable to Low-Income Households by Bedroom Size, Thomas Jefferson Region, June 2022						
Unit Size	Median Rent	Number with Unit Type and Rent Data	Developments with Average Rents Affordable at			
			0%-30% of AMI		30%-50% of AMI	
			Number	Percent	Number	Percent
Studio	\$1,216	15	1	7%	4	27%
One-Bedroom	\$1,211	87	3	3%	28	32%
Two-Bedroom	\$1,514	109	5	5%	34	31%
Three-Bedroom	\$1,784	59	2	3%	12	20%

Source: CoStar, 2022; Partners for Economic Solutions, 2022.

Only eight developments with a total of 228 units have average rents for units of any size affordable to households with incomes up to 30 percent of AMI. The 46 developments with average rents affordable to households at 30 to 50 percent of AMI have 3,280 units. Despite an increase in the number of units and households, the number of units affordable to households with incomes up to 50 percent of AMI has fallen 36 percent from 5,140 units in 2014-2018 to 3,280 units in 2022.

The shortages in units at affordable rents is evidenced by the difficulties that households with housing choice vouchers have in finding units in Charlottesville and Albemarle County they can access with their vouchers. Many are forced to seek housing farther out away from transit access, jobs and services.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

The opening of Premier Circle to serve medically vulnerable individuals has met an important gap, particularly in a time of growing numbers of older persons facing

homelessness. At least 50 to 70 of the 92 units will be lost in April 2023 when construction begins on 80 units of permanent supportive housing. There is a gap of roughly \$400,000 in the funding needed to support these individuals through April and their rehousing. Unless the current residents can be rehoused and those units replaced, this will create a significant gap. An additional \$400,000 is needed to maintain the 22 remaining units for another 12 months from May 2023 through April 2024.

Twenty-four of the shelter beds are available only for 20 weeks in cold weather. This indicates a need for a low-barrier year-round shelter.

Service providers noted that the region has an insufficient number of beds for persons with mental illness or substance abuse issues, as evidenced by the number of unsheltered individuals with mental illness (10) or substance abuse (10) issues found in the Point-in-Time Count.

Service providers also identified a lack of funding for 1) emergency transportation to shelters for sexual abuse victims, particularly at night, and 2) transportation vouchers to access housing and other services. Lack of access to public restrooms is a continuing problem for both unhoused individuals and the public at large, specifically along the mall in downtown Charlottesville.

At Risk of Homelessness as defined in 24 CFR 91.5

A key gap relates to homeless families. Though few were identified in the Point-in-Time Count, local social service agencies report many families that would qualify on the basis of doubling and tripling up or living in substandard conditions. Statistics reported to the U.S. Department of Education indicate that the six school districts in the region had 299 students who were homeless during the 2020-2021 school year.

With the end of the Rent Relief Program, many more families are at risk of eviction, particularly in the face of rapidly rising rents, which preclude their ability to locate other suitable housing. The region has some limited funding available to help families make the transition, e.g., security deposit or first month's rent; however, those one-time grants are not necessarily sufficient to get the families into a stable housing situation.

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

The Shelter for Help in Emergency is well equipped to provide up to 90 days of housing for domestic violence victims and has no waiting list. It is much more limited in its ability to help those victims transition into permanent housing with only two transitional housing units. SARA has seen an uptick in teenagers being sexually trafficked but has no statistics. Without an appropriate youth shelter, they often return to their traffickers.

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

In the rural counties where housing instability is often seen in households living in substandard housing, deterioration of those units can trigger a loss of shelter. This is

particularly true for seniors without the means to maintain their aging homes. Repairs to roofs, HVAC systems and access ramps could allow these seniors to age in place.

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

Some community development professionals from the rural counties were not fully aware of the services available to the homeless regionally. Outreach to those agencies would be appropriate so as to emphasize the importance of linking their clients to available services through HMIS. Establishing a standard protocol of sending referrals from the rural counties through the Homeless Hot Line or The Haven would reinforce the Coordinated Entry system.

The number of transitional housing units is woefully inadequate with only six units explicitly reserved for persons transitioning from homelessness. The regional housing shortage impedes housing voucher holders from securing housing accessible to jobs, transit and services. Hiring housing navigators to build direct relationships with landlords and help them mitigate the risks of accepting vouchers could help to reduce landlords' reluctance to participate.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Living in substandard/unsafe housing, as identified in the 2018 Consolidated Plan. There are individuals and households across the planning district that live in unsafe/substandard housing primarily due to their inability to finance repairs or move.

Identify priority needs for qualifying populations:

There are a significant number of challenges facing qualifying populations. The first priority need for qualifying populations is the ability to access safe and affordable housing. This is a priority need of all qualifying populations and subpopulations, including elderly individuals in rural areas. The second priority need is for additional supportive services to support qualifying populations to promote stability in the search for housing or to remain in a stable housing situation, including medically vulnerable individuals currently experiencing homelessness. A third priority need is to increase capacity in rural areas to provide supportive services and permanent housing to qualifying populations, especially seniors and families with children. A final priority need is access to jobs that are able to pay for the increasing cost of housing.

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

These priority needs were developed with the input of over 35 organizations including local governments, service providers, and other stakeholders that interact with the qualifying populations in the region. There is a significant gap in rental units available to qualifying populations in the region; the level of need and gaps were determined using the data provided by organizations consulted, as well as additional federal, state, local, and private sector sources. TJPDC synthesized this information and provided it to localities to inform their allocation planning. The clear need for more rental housing and supportive services was reflected in both

the hard data and testimony from consulted organizations; that there are many individuals who belong to one or more qualifying populations that have a difficult time accessing housing and supportive services, even with vouchers or other support systems. Thus, the localities in the HOME consortium have chosen to allocate HOME-ARP funds to develop new affordable rental housing for qualifying populations, as well as provide supportive services to help individuals and families stay housed and achieve self-sufficiency.

HOME-ARP Activities

Template:

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

Albemarle: HOME-ARP funds designated for Albemarle County will be provided to the HUD-designated Continuum of Care lead agency – Blue Ridge Area Coalition for the Homeless (BRACH) – to be used in the areas needed most, described below. BRACH has completed a strategic plan, based on longitudinal data and performance data reviews, resulting in prioritized areas within the continuum of care, most notably emergency shelter programming and supportive services.

Charlottesville: The method to solicit contractors to build affordable rental housing will be through a Request for Proposal (RFP).

Fluvanna: Fluvanna/Louisa Housing Foundation (FLHF) was selected by the Board of Supervisors to develop affordable rental housing in the County; FLHF is the County's HOME subrecipient and was able to present a project that was eligible under HOME-ARP guidelines and serves QP's. FLHF was able to provide evidence through both the HOME-ARP consultation process as well as to the Board of Supervisors and County staff that indicated a critical need for affordable rental housing for elderly individuals at risk of homelessness. Through these consultations and meetings, the Board of Supervisors indicated that FLHF will be allocated Fluvanna's portion of the regional HOME-ARP funding.

Greene: N/A

Nelson: Nelson County Community Development Foundation (NCCDF) was selected by the Board of supervisors to develop affordable rental housing in the County; NCCDF is the County's HOME subrecipient and was able to present a project that was eligible under HOME-ARP guidelines and serves QP's. NCCDF was able to provide evidence through both the HOME-ARP consultation process as well as to the Board of Supervisors and County staff that indicated a critical need for affordable rental housing for elderly individuals at risk of homelessness. Through these consultations and meetings, the Board of Supervisors indicated that NCCDF will be allocated Nelson's portion of the regional HOME-ARP funding.

Louisa: Fluvanna/Louisa Housing Foundation (FLHF) was selected by the Board of Supervisors to develop affordable rental housing in the County; FLHF is the County’s HOME subrecipient and was able to present a project that was eligible under HOME-ARP guidelines and serves QP’s. FLHF was able to provide evidence through both the HOME-ARP consultation process as well as to the Board of Supervisors and County staff that indicated a critical need for affordable rental housing for elderly individuals at risk of homelessness. Through these consultations and meetings, the Board of Supervisors indicated that FLHF will be allocated Louisa’s portion of the regional HOME-ARP funding.

Describe whether the PJ will administer eligible activities directly:

Only Greene County will administer funding directly through its Department of Social Services.

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

N/A

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Template:

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 694,809.83		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ 1,285,398.19		
Non-Profit Operating	\$ 52,110.74	2.13%	5%
Non-Profit Capacity Building	\$ 52,110.74	2.13%	5%
Administration and Planning	\$ 367,840.50	15%	15%
Total HOME ARP Allocation	\$ 2,452,270.00		

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

As indicated in the Cooperative Agreement that provides the framework for the Thomas Jefferson HOME Consortium, each of the six localities will receive 1/6 of the total HOME-ARP funding, minus 15% for the TJPDC to administer the grant. That total is \$2,084,429.50, with each locality receiving \$347,404.92. Localities have the option to designate \$34,740.49 for nonprofit operating and/or capacity building. TJPDC staff worked with each locality to

determine an appropriate activity, informed by the Gaps and Needs analysis, which can be found below.

Albemarle: Albemarle County's \$347,404.92 allocation will be distributed to the CoC lead, Blue Ridge Area Coalition for the Homeless, for the purpose of providing supportive services to medically vulnerable homeless individuals in emergency shelter. Supportive services will be prioritized for those individuals in emergency shelter beds that will be turned over for the development of permanent supportive housing construction in mid-year 2023. Supportive services will be focused on developing and implementing housing permanency plans for these individuals in advance of the Premier Circle emergency shelter program closure. Housing permanency plans will include housing search, landlord relationship-building, application to mainstream housing programs, and warm referrals to medical and behavioral health programs, as appropriate.

Charlottesville: The City of Charlottesville's \$347,404.92 allocation will be used to fund development of new affordable rental housing for the qualifying populations.

Fluvanna: Fluvanna County's \$312,664.43 allocation will be provided to the Fluvanna-Louisa Housing Foundation (FLHF) for the development of 8 affordable rental housing units with a preference for older residents at greatest risk of housing instability due to substandard housing and whose incomes fall below 50% AMI. FLHF will be allocated \$34,740.49 for nonprofit capacity and operating expenses.

Greene: Greene County's \$347,404.92 allocation will be used by its Department of Social Services to provide supportive services to individuals and households within the qualifying populations through direct assistance and case management services, with a preference for households with children and then older individuals.

Nelson: Nelson County's \$312,664.43 allocation will be allotted to the Nelson County Community Development Foundation (NCCDF) who will use them to develop 4 affordable rental housing units in Nelson County with a preference for older residents at greatest risk of homelessness due to substandard housing who fall below 50% AMI. NCCDF will be allocated \$34,740.49 for nonprofit capacity and operating expenses.

Louisa: Louisa County's \$312,664.43 allocation will be provided to the Fluvanna-Louisa Housing Foundation (FLHF) for the development of 8 affordable rental housing units in Louisa with a preference for older residents at greatest risk of housing instability due to substandard housing and whose incomes fall below 50% AMI. FLHF will be allocated \$34,740.49 for nonprofit capacity and operating expenses.

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:

Albemarle: The gap analysis points to several housing needs in this community. A significant lack of affordable housing inventory combined with a high cost of living and housing makes housing a challenge for all community members below 120% of area median income. A best practice is to focus on the most vulnerable, however, prioritize those individuals at the highest risk. Given the looming closure of the Premier Circle emergency shelter program and the subsequent loss of the 92 shelter beds designated for medically vulnerable community members, the highest priority in Albemarle County is securing safe housing for these individuals. This focus on the most vulnerable ensures that we are working to prevent the highest degree of harm to these individuals and avoiding the deep-end system costs associated with a large, medically fragile unsheltered population.

Charlottesville: There is a serious shortage of affordable units for households making 60% AMI or less, and this challenge is even more problematic for those making 0 to 30% AMI. The City has made a goal to amend its Housing Policy to target these hard-to-serve qualifying populations. The related Inclusionary Zoning is currently under way. The construction of new affordable rental units for QP's aligns with both the previously indicated needs as well as the City's priorities.

Fluvanna: The construction of one-bedroom housing units with a preference towards seniors at greatest risk of homelessness is appropriate as Fluvanna County is rural with an aging population. The aging population is at great risk of homelessness due to substandard or insufficient housing. The current need for repairs outpaces the funding available and many of the housing units require 3 or more systems to be replaced. Many of the low-income seniors in the area fall below the 50% AMI income threshold, many below 30% AMI, and lack the means to maintain their home properly and subsequently live in deteriorating housing with multi-system failures. Much of the current housing inhabited by elderly residents is in such a state of disrepair that fixing the unit is no longer financially responsible as it should be demolished. The housing shortage, particularly for smaller units, is severe as there are minimal multi-family apartment units available. The older population requires downsizing and lower maintenance housing, but the area lacks one- and two-bedroom units. Almost all available housing inventory is located in Charlottesville and Albemarle County with few, if any resources in Fluvanna.

Greene: In Greene, services to help individuals and families maintain rental housing are extremely limited; a system of coordinated care for such assistance is lacking. The funds, then, would be used to bolster both. Through the establishment of "case management" services that could coordinate and assist families with supportive services to rebuild stability to maintain housing is critical for families in Greene facing disruption. Furthermore, over the past several years but especially since the onset of the COVID pandemic, Greene County Social Services has encountered numerous instances of families facing disruption due to housing instability, thus creating trauma and lack of permanence for the children. This has at times resulted in separation of the family and the children entering foster care. There are also a significant number of elderly residents at risk of homelessness in the County due to limited income, substandard housing, or other risk factors.

Nelson: The housing inventory in Nelson has been the most competitive in the region with many of the smaller, older homes that can be repaired going to the short-term rental market instead.

Many of the existing homes owned by seniors are not eligible for repair due to the extent of the deterioration. Nelson County has a population in poverty of 11.5% or 1,687 people (380 families). There are 205 families under 30% AMI at risk of homelessness. The average for the county hides the fact that there are areas in Nelson that are much more impacted than others. Afton and Nellysford, with an older, but much more affluent population has much lower poverty rates across all age groups than the Eastern district (Schuyler) which has rates of over 25%, for example. In the rural counties where housing instability is often seen in households living in substandard housing, deterioration of those units can trigger a loss of shelter. This is particularly true for seniors without the means to maintain their aging homes. Repairs to roofs, HVAC systems and access ramps could allow these seniors to age in place, however, the needs are outpacing the repair efforts and many homes are beyond repair. The inhabitants are, in fact, homeless as they have nowhere else to go. Some live in buildings that are not suitable for human habitation.

The preference for the 4 new affordable two-bedroom rental units will be seniors. This population is at greatest risk of homelessness due to substandard or insufficient housing. The NCCDF provides a stopgap by repairing homes for the elderly, however, the needs outpace the funding available and many of the housing units require 3 or more systems to be replaced. Many of the low-income seniors in the area fall below the 50% AMI income threshold, many below 30% AMI, and lack the means to maintain their home properly and subsequently live in deteriorating housing with multi-system failures. Much of the current housing inhabited by elderly residents is in such a state of disrepair that fixing the unit is no longer financially responsible as it should be demolished.

Louisa: The construction of one-bedroom housing units with a preference towards seniors at greatest risk of homelessness is appropriate as Louisa County is rural with an aging population. The aging population is at great risk of homelessness due to substandard or insufficient housing. The current need for repairs outpaces the funding available and many of the housing units require 3 or more systems to be replaced. Many of the low-income seniors in the area fall below the 50% AMI income threshold, many below 30% AMI, and lack the means to maintain their home properly and subsequently live in deteriorating housing with multi-system failures. Much of the current housing inhabited by elderly residents is in such a state of disrepair that fixing the unit is no longer financially responsible as it should be demolished. The housing shortage, particularly for smaller units, is severe as there are minimal multi-family apartment units available. The older population requires downsizing and lower maintenance housing, but the area lacks one- and two-bedroom units. Almost all available housing inventory is located in Charlottesville and Albemarle County with few, if any resources in Louisa.

HOME-ARP Production Housing Goals

Template

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

At least 20 new affordable rental units for qualifying populations will be developed across the Thomas Jefferson HOME Consortium's member localities.

Albemarle: N/A

Charlottesville: Potential number of units to be produced will be determined after the Request For Proposal process is completed.

Fluvanna: At least 8 units will be produced with HOME-ARP funds seniors at greatest risk of homelessness in Fluvanna County.

Greene: N/A

Nelson: At least 4 units will be produced with HOME-ARP funds for seniors at greatest risk of homelessness in Nelson County.

Louisa: At least 8 units will be produced with HOME-ARP funds for seniors at greatest risk of homelessness in Louisa County.

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

Albemarle: N/A

Charlottesville: Due to the uncertainty around other funds involved in the development of affordable rental housing for qualifying populations using HOME-ARP funds, the City does not have an estimate for the number of units that will be developed. However, these funds will, hopefully, be leveraged into developing many new affordable rental units.

Fluvanna: The 8 one-bedroom housing units will be constructed to address the needs of the aging community in the area, those that are at greatest risk of homelessness, low-income, and living in substandard housing due to a lack of viable options. This goal will serve to alleviate the priority need for stable, safe housing for elderly individuals at risk of homelessness.

Greene: N/A

Nelson: The 4 two-bedroom housing units will be constructed to address the needs of the aging community in the area, those that are at risk of homelessness, low-income, and living in substandard housing due to a lack of viable options.

Louisa: The 8 one-bedroom housing units will be constructed to address the needs of the aging community in the area, those that are at greatest risk of homelessness, low-income, and living in substandard housing due to a lack of viable options. This goal will serve to alleviate the priority need for stable, safe housing for elderly individuals at risk of homelessness.

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).

Template:

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:

Albemarle: Albemarle intends to give a preference for medically vulnerable adults experiencing homelessness (QP1).

Charlottesville: N/A

Fluvanna: Preference will be given to residents at greatest risk of homelessness (QP4) age 70 or older and under 30% AMI in a dwelling that is considered substandard (has 3 or more systems in their home failing). A secondary preference will be made for those 62 or older and under 50% AMI with 2 or more systems failing. The method of prioritization will consider the individual's income, age, and condition of housing.

Greene:

Greene County considers the use of HOME ARP funds as available to all eligible populations with a priority provided to:

1. Families with children under the age of 18 and are homeless or at risk of homelessness;
2. Persons over the age of 60 who are homeless or are at risk of homelessness;
3. All other eligible populations.

Nelson: Preference will be given to residents at greatest risk of homelessness (QP4) age 62 or older and under 50% AMI in a dwelling that is considered substandard (has 3 or more systems in their home failing)..

Louisa: Preference will be given to residents at greatest risk of homelessness (QP4) age 70 or older and under 30% AMI in a dwelling that is considered substandard (has 3 or more systems in their home failing). A secondary preference will be made for those 62 or older and under 50% AMI with 2 or more systems failing.. The method of prioritization will consider the individual's income, age, and condition of housing.

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

Albemarle: There is a significant gap in services for medically vulnerable individuals who are currently experiencing homelessness. This prioritization was chosen in order to address a critical gap in services for those experiencing homelessness who are most vulnerable due to medical conditions. This issue was identified in the needs assessment and gap analysis as a critical subpopulation of individuals currently experiencing homelessness.

Charlottesville: N/A

Fluvanna: A high percentage of the <50% AMI aging population live in substandard housing and are at greatest risk homelessness due to 3 or more systems failing in their home. Point in time counts are difficult to identify the homeless as they do not encompass failing housing units. These homeowners do not have the means necessary to make critical home repairs and renovations to keep their home habitable. In Fluvanna, at least 100 families are provided major home repairs each year to keep them in their homes with an average age of 72 years for each recipient. Average home repair cost is \$3,617 and only takes care of the most urgent need. Many recipients return annually for additional needed repairs. In accordance with 24 CFR 91.5, this population can be considered at-risk of homelessness because these individuals make less than 50% AMI and live in substandard housing, which is a characteristic associated with housing insecurity identified in the Consortium's approved Consolidated Plan.

Greene: The gaps and needs analysis identified a lack of rental housing, and specifically affordable rental housing, in the region but particularly exacerbated in the outlying rural counties. Available beds for emergency shelter and transitional housing are also in short supply. Likewise, services to remedy factors contributing to housing instability are limited, and again all the worse in the rural counties of the district. Given such restrictions, combined with limited resources, the analysis implies the assistance focus on the most vulnerable populations among the categories. Greene County has assessed the most vulnerable to include children in families who are homeless or are at risk of homelessness, and the elderly. Both are at substantial risk of significant impact lacking permanent and stable housing.

Nelson: Many of Nelson's aging citizens live in substandard housing and are at risk of homelessness due to 3 or more systems failing in their home. There are many families with children that are doubled up as well. Point in time counts and other statistics do not accurately represent the entire picture of poverty. They do not include failing housing units and homeowners who do not have the means necessary to make critical home repairs and renovations to keep their home inhabitable. In accordance with 24 CFR 91.5, this population can be considered at-risk of homelessness because these individuals make less than 50% AMI and live in substandard housing, which is a characteristic associated with housing insecurity identified in the Consortium's approved Consolidated Plan.

Louisa: A high percentage of the <50% AMI aging population live in substandard housing and are at greatest risk of homelessness due to 3 or more systems failing in their home. Point in time counts are difficult to identify the homeless as they do not encompass failing housing units. These homeowners do not have the means necessary to make critical home repairs and renovations to keep their home habitable. In accordance with 24 CFR 91.5, this population can be considered at-risk of homelessness because these individuals make less than 50% AMI and live in substandard housing, which is a characteristic associated with housing insecurity identified in the Consortium's approved Consolidated Plan.

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).

Template:

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

Albemarle: Albemarle County will rely on the Coordinated Entry process operated by COC lead Blue Ridge Area Coalition for the Homeless, which will identify individuals by vulnerability, including the presence of disability or illness, and individuals designated as homeless per HUD's definition.

Charlottesville: Potential contractors will be required to use affirmative marketing of available units by coordinating with services providers like BRACH, Piedmont Housing Alliance (PHA), the Charlottesville Redevelopment and Housing Authority (CRHA), the City of Charlottesville's Office of Community Solutions, Department of Human Services, and other referral organizations. This process will create a list of qualifying individuals for the new rental units.

Fluvanna: FLHF will use a waiting list that will incorporate HUD-approved preferences and will serve individuals in chronological order.

Greene: Greene County will utilize a two-pronged referral process to include the coordinated entry system through the Thomas Jefferson Area Coalition for the Homeless as part of the Continuum of Care as well as an internal referral system. Referrals received through the CE will be accepted as indirect referral and combined on a waitlist with referrals made directly to the Greene County Department of Social Services.

Nelson: NCCDF will use a waiting list that will incorporate HUD-approved preferences and will serve individuals in chronological order.

Louisa: FLHF will use a waiting list that will incorporate HUD-approved preferences and will serve individuals in chronological order.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

Albemarle: All qualifying populations will be eligible for supportive services, but homeless individuals with medical conditions will be prioritized. The CE process will be used to identify these individuals for services.

Charlottesville: N/A

Fluvanna: N/A

Greene: Greene County will use the CE process to receive eligible applicants from all populations to be added to the waitlist maintained by the Greene County Department of Social Services.

Nelson: N/A

Louisa: N/A

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

Albemarle: The method of prioritization will be to first identify individuals who are chronically homeless by HUD's definition. Then, those who are considered medically vulnerable – including the presence of a disability or illness – will be prioritized for supportive services through HOME-ARP funding.

Albemarle: N/A

Charlottesville: N/A

Fluvanna: N/A

Greene: As described previously, Greene County prioritizes families with children under the age of 18 and, secondly, persons over the age of 60 as the most vulnerable populations needing supportive services. All other populations are then open as received chronologically.

Nelson: N/A

Louisa: N/A

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

Albemarle: N/A

Charlottesville: N/A

Fluvanna: N/A

Greene: Greene County would not distinguish between the two methodologies.

Nelson: N/A

Louisa: N/A

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.

Template

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

Albemarle: N/A

Charlottesville: N/A

Fluvanna: N/A

Greene: N/A

Nelson: N/A

Louisa: N/A

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Albemarle: N/A

Charlottesville: N/A

Fluvanna: N/A

Greene: N/A

Nelson: N/A

Louisa: N/A

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Albemarle: N/A

Charlottesville: N/A

Fluvanna: N/A

Greene: N/A

Nelson: N/A

Louisa: 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***

N/A

- ***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