



URBAN COUNTY OF SANTA CLARA HOME ARP Allocation Plan

Public Comment Period: March 7, 2023 – March 23, 2023



Prepared by the Office of Supportive Housing

Housing and Community Development Division
150 W. Tasman Drive, Suite 2A
San Jose, CA
Director Consuelo Hernandez, AICP

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Executive Summary

The County of Santa Clara (County) as the HOME Consortium lead will receive a one-time allocation of HOME-American Rescue Plan Act (HOME-ARP) funding, in the amount of \$3,599,966 from the U.S. Department of Housing and Urban Development (HUD). To receive the HOME-ARP allocation, the County must develop an allocation Plan that will become part of the Fiscal Year 2021/2022 One Year Action Plan (FY21/22 Action Plan).

Consultation Process

HUD requires each Participating Jurisdiction to consult with agencies and service providers whose clientele include the HOME-ARP qualifying populations. Agencies that must, at a minimum, be consulted include the Continuum of Care serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address fair housing, civil rights, and the needs of persons with disabilities. HUD also requires that each Participating Jurisdiction provide opportunities for the public to comment on the proposed Allocation Plan, including the amount of HOME-ARP funds that will be received and the range of activities that the County may undertake.

The County of Santa Clara’s Office of Supportive Housing started its engagement process in 2021 as part of the County’s gap analysis for unhoused families with children. This effort included multiple consultation sessions with stakeholders from each of the recommended entities and a regular evaluation of the gaps in serving homeless families. This engagement process has been extended over a period of time when a number of new resources have entered our community and there was a desire to allow for a more intentional review of the system gaps. In addition, the Office of Supportive Housing held two different public hearings to give the Board the opportunity to provide multiple opportunities for input.

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

<u>Agency/Org Consulted</u>	<u>Type of Agency/Org</u>	<u>Method of Consultation</u>	<u>Feedback</u>
Destination Home Board	Public Private Entity	Virtual Meeting July 30, 2021	Recommended looking at different ways to leverage the resources to make a real impact.
Santa Clara County Continuum of Care Board	Local Continuum of Care	Virtual Meetings July 7, 2021 September 9, 2021 March 28, 2022	Supports targeting the resources towards supportive services for families enrolled in Heading Home. Provided regular updates on the gaps in the system and continue to support the County’s

			<p>recommendation for HOME-ARP.</p> <p>Note: CoC Staff provided the internal OSH team working on the HOME ARP plan with data related to homeless families and survivors of gender based violence.</p>
Santa Clara County Office of Immigrant Relations (OIR)	Local Government	Remote meeting August 4, 2021	Consider connecting families to additional services provided through OIR. There is an identified gap amongst families who are undocumented.
Victim Services Providers DV Consortium comprised of YWCA, NextDoor, Community Solutions, AACI and the Santa Clara County Office of Gender Based Violence Prevention	Victim service providers (DV, human trafficking, and gender based violence)	Remote Meeting October 26, 2021	Generally asked for assistance in better navigating the housing system and advocated for a new housing intervention for survivors that allows for a three-year transition period. Discussed a variety of options related to housing opportunities and referral processes.
Santa Clara County Housing Authority	Local Public Housing Authority for the City of San Jose and the County of Santa Clara	Remote meetings October 28, 2021 November 1, 2021	Supported the county's proposal and offered support in engaging with landlords and services partners. Discussed various ways to engage landlords in supporting families with an EHV or HCV.
Saint Joseph's	Services – Homeless, at risk and other populations	Remote Meeting November 1, 2021 & November 10, 2021	Mentioned that families need more time to find an apartment.
YWCA of Silicon Valley	Services – Homeless, at risk, survivors	Remote Meeting November 1, 2021 & November 10, 2021	Supported the county's proposal but asked for assistance in acquiring

			apartments that can be used solely for survivors of gender based violence.
Amigos de Guadalupe	Services – Homeless, at risk and other populations	Remote Meeting November 1, 2021 & November 10, 2021	Supported the County’s proposal and describe the additional hardship that families face when being unsheltered and/or living in their vehicles.
Abode Services	Services – Homeless, at risk, veterans	Remote Meeting November 1, 2021 & November 10, 2021	Supported the county’s proposal and encouraged engagement with local landlords.
HomeFirst	Services – Homeless, at risk, veterans	Remote Meeting November 1, 2021 & November 10, 2021	Provided testimony around the struggles faced by families and the limited number of resources available for families with school aged children.
LifeMoves	Services – Homeless, at risk, veterans	Remote Meeting November 1, 2021 & November 10, 2021	Shared information about upcoming programs and the City of San Jose’s motel voucher program for families.
Community Solutions	Services – Homeless, at risk, veterans, and survivors	Remote Meeting November 1, 2021 & November 10, 2021	Shared that more families are in need of intensive case management than before.
City of Campbell	Local Government	Remote meeting January 12, 2022	
City of Cupertino	Local Government	Remote meeting January 12, 2022	
City of Gilroy	Local Government	Remote meeting January 12, 2022	
Town of Los Gatos	Local Government	Remote meeting January 12, 2022	
City of Morgan Hill	Local Government	Remote meeting January 12, 2022	
City of Mountain View	Local Government	Remote meeting January 12, 2022	Asked the County for a list of CoC providers
City of Palo Alto	Local Government	Remote meeting	

		January 12, 2022	
City of San Jose	Local Government	Remote meeting January 12, 2022	Supported the County's proposal.
City of San Clara	Local Government	Remote Meeting January 12, 2022	Supported the County's proposal to use funding for supportive services with a priority on families.
City of Saratoga	Local Government	Remote Meeting January 12, 2022	
City of Sunnyvale	Local Government	Remote Meeting January 12, 2022	
Community Solutions 1:1	Victim Services Provider	March 17, 2022	Asked about the opportunity to acquire a single family home for survivors.
Santa Clara County Social Services Agency	Local Government	Virtual Meetings April 7, 2022	Asked about ways to integrated households who are also enrolled in the County's CalWorks programs.

Public Participation

Public participation plays a central role in the development of the HOME ARP Allocation Plan. A public notice was available on the County's website and published in the **San Jose Mercury News on March 8 2022, announcing the 15 day public comment period.** The Plan is available electronically on the OSH's website (www.sccgov.org/sites/osh). In addition, public comments were encouraged at the hearing listed below, or could be submitted in writing to:

Office of Supportive Housing
Housing and Community Development Division
150 W. Tasman Drive, Suite 2A
San Jose, CA 95134

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

<u>Board of Supervisors</u> Public Hearing to consider HOME - ARP Adoption of CDBG/HOME FY20/21	March 14, 2023 Hybrid in person and via teleconference County Government Center 70 W. Hedding Street San Jose, CA
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Public Comment Period:

The Public Comment Period began on March 7, 2023 and concluded on March 23, 2023.

Describe any efforts to broaden public participation:

It is the intent of the County to provide for and encourage citizen participation, with particular emphasis on participation by lower income persons who are beneficiaries of or impacted by entitlement- funded activities. The County Office of Supportive Housing took a different approach in engaging the local community and targeted stakeholders around the use of the HOME ARP funding.

First, as standard practice, CDBG entitlement jurisdictions from throughout the County hold quarterly meetings known as the CDBG Coordinators Group. The purpose is to share information, best practices, new developments, and federal policy and appropriations updates among the local grantee staff. Over the course of the past 18 months, the Office of Supportive Housing has been providing this group with an update on its progress in ongoing discussions around system gaps and the desire to focus on families with children.

Second, the Office of Supportive Housing has provided updates through existing meetings sharing information about the current system gaps and better understanding the needs of families and individuals across multiple County departments who are experiencing homelessness. This includes connecting with internal county partners like the NICU to identify unhouse pregnant women.

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

No comments were received during the public participation process.

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

No comments were received during the public participation process.

Needs Assessment and Gap Analysis

Introduction

In 2020, the Community Plan to End Homelessness in Santa Clara County (the Plan) was released, which outlines a roadmap for community-wide efforts to end homelessness in the County by 2025. The strategies and action steps included in the plan are grounded in evidence-based practices, lessons learned over the past five years, and input from more than 8,000 members of the community; including people with lived experience of homelessness, subject matter experts, key stakeholders, and community members. The Plan identifies strategies to address the needs of homeless persons in the County, including chronically homeless individuals and families, families with children, veterans, and unaccompanied youth. Additionally, it also intended to address the needs of persons at risk of homelessness.

The Plan is organized around three main strategies:

1. Address the root causes of homelessness through system and policy change;
2. Expand homelessness prevention and housing programs to meet the need; and
3. Improve quality of life for unsheltered individuals and create healthy neighborhoods for all

The plan includes the following targets to be achieved by 2025:

1. Achieve a 30% reduction in annual inflow of people becoming homeless.
2. House 20,000 people through the supportive housing system.
3. Expand the Homeless Prevention System and other early interventions to serve 2,500 people per year.
4. Double the temporary housing and shelter capacity to reduce the number of people sleeping outside.
5. Address the racial inequities present among unhoused people and families and track progress toward reducing disparities.

Unlike the traditional HOME funding requirements, HOME-ARP funds are intended to serve a specific targeted population know as Qualifying Populations¹. According to the 2022 Point-In-Time County, there are currently 10,028 unhoused individuals in Santa Clara County. The County's HOME PJ includes the following cities: Campbell, Cupertino, Gilroy, Los Altos Hills, Los Altos, Los Gatos, Monte Sereno, Morgan Hill Saratoga, Palo Alto, Unincorporated County areas.

Table 1: 2022 PIT County by Geography

Santa Clara County Homeless PIT (All County)	8,095
County of Santa Clara HOME PJ (Geographic Boundaries)	1,933
Totals	10,028

The Office of Supportive Housing is the lead in managing the County's HOME program and is the collaborative applicant for the Santa Clara County Continuum of Care. This unique position gives the Office of Supportive Housing a greater sense of the needs of the qualifying populations across the county.

¹ <https://www.hudexchange.info/resource/6479/notice-cpd-2110-requirements-for-the-use-of-funds-in-the-home-arp-program/>

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

Homeless as defined in 24 CFR 91.5

There were 10,028 persons experiencing homelessness during the 2022 PIT Count on February 23rd and 24th, 2022. This represents a 3% increase from 2019. The percentage of persons living on the streets decreased slightly from 2019, while the percentage of persons staying in shelters increased by 30%. This increase in persons staying in shelters is likely due to increased Covid funding allocated to shelters and increased community efforts towards increasing shelter capacity. The following tables are taken from the 2022 PIT report showing the demographics of the County's unhoused population and presented here in this report as "figures".

Figure 1: Demographic tables from the 2022 Point-In-Time County

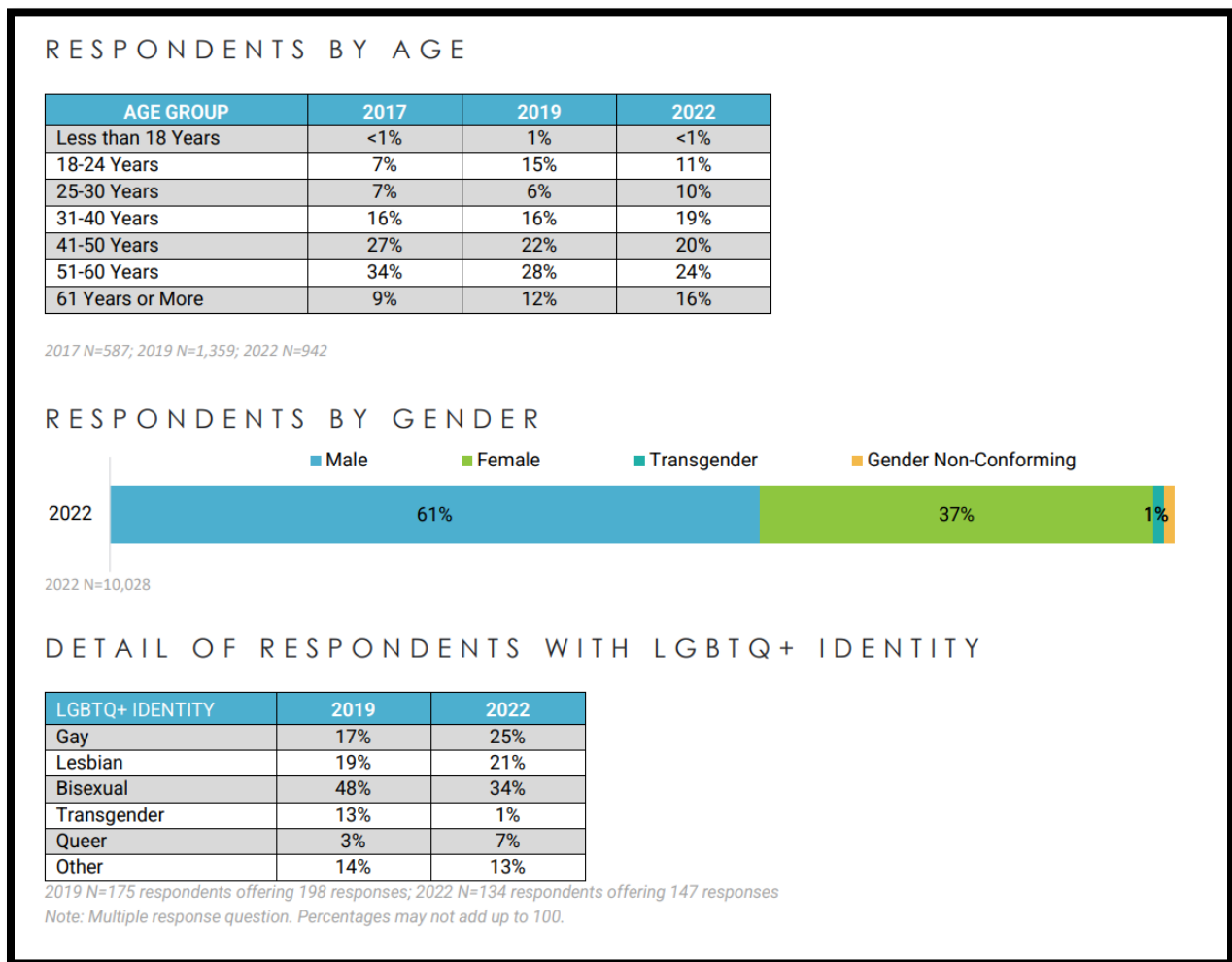
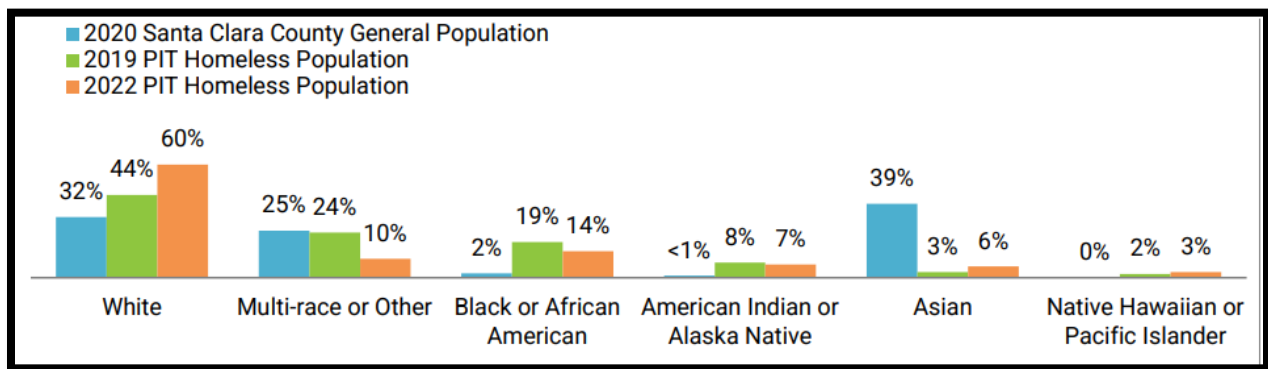
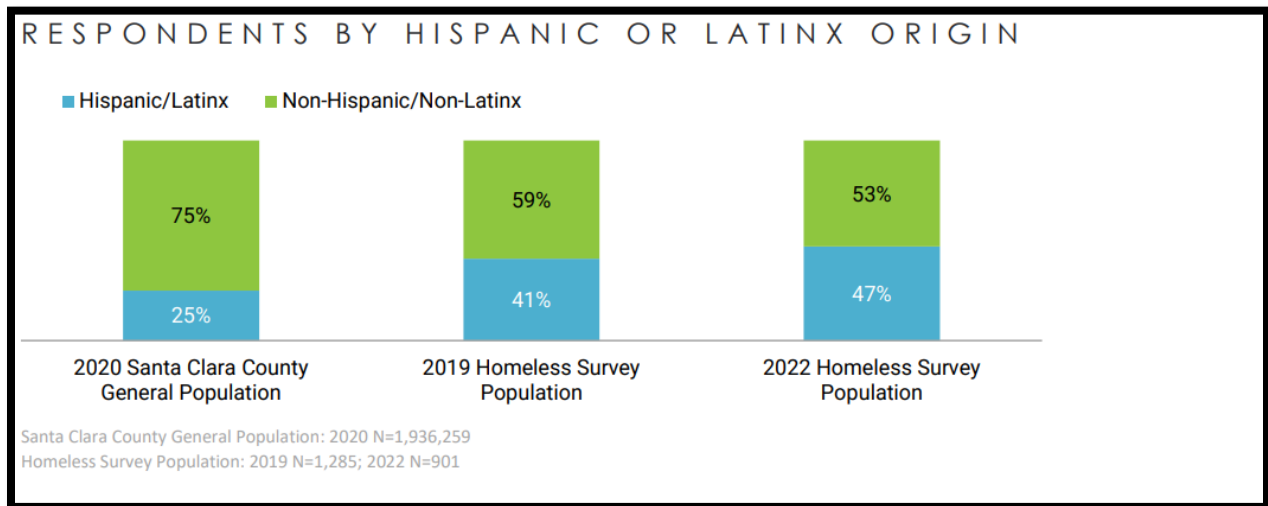


Figure 2: Demographic Information from the 2022 Point-In-Time Count



At Risk of Homelessness as defined in 24 CFR 91.5

According to the California Housing Partnership’s 2021 Affordable Housing Needs Report, 74% of Extremely Low-Income families in Santa Clara County are paying more than half of their income on housing costs compared to just 1% of moderate-income households². Renters in Santa Clara County need to earn \$46.21 per hour to afford the average monthly asking rent of \$2,403.

The most severe impacts of COVID-19 have been felt by the most vulnerable members of our community. Most renters with increasing debt and who are most at risk of evictions are low-wage employees and disproportionately are people of color. On September 16, 2021 Policy Link³ that two-thirds of renters with rental arrears are people of color as renters of color have been disproportionately impacted by the pandemic and are most vulnerable to eviction. Further, households unable to pay rent has remained at 14-15 percent, which is twice the baseline pre-pandemic.

² https://chpc.wpenginepowered.com/wp-content/uploads/2021/05/Santa-Clara_Housing_Report.pdf

³ Policy Link: Rent Debt in America: Stabilizing Renters Is Key to Equitable Recovery, <https://www.policylink.org/node/65136>

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

As of August 4, 2022, there were 914 households on the Community Queue who reported currently fleeing domestic violence or being a DV Victim/Survivor within the past year. Chart 1 provides a summary of when the domestic violence occurred. The majority, or 58% of those currently on the Community Queue self-identified as currently fleeing domestic violence. Chart 2 provides a summary of level of housing intervention need.

Chart 1: Domestic Violence Occurrence for DV Victims/Survivors on the Community Queue

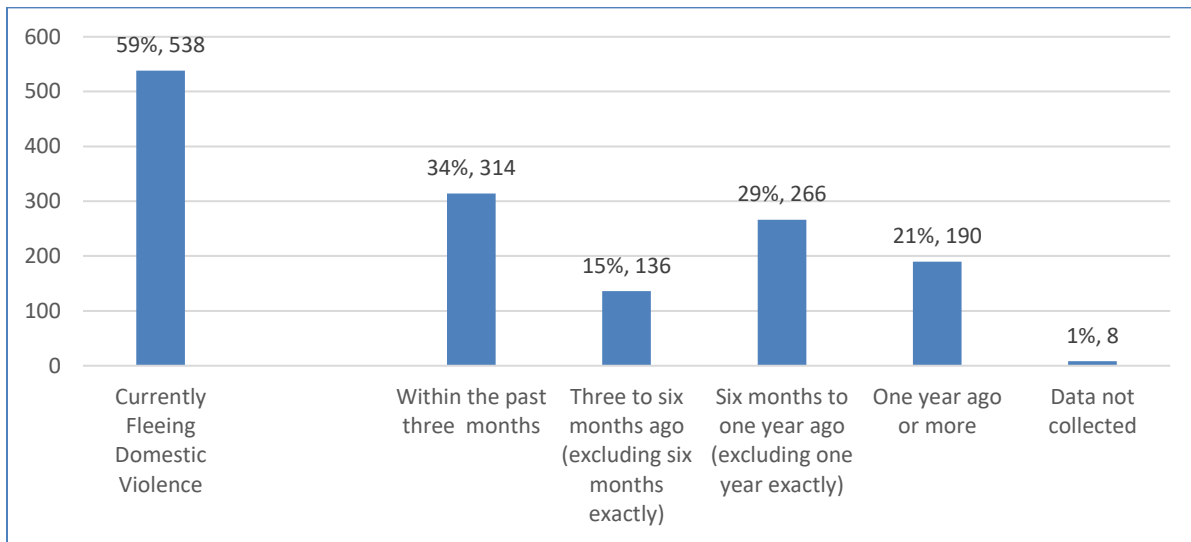


Chart 2: Level of Need based on Vi-SPDAT Score

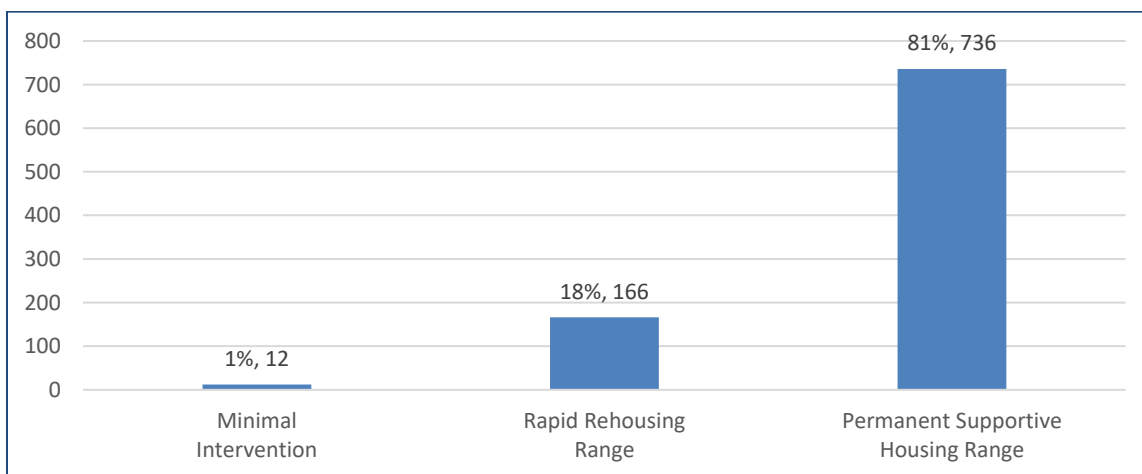


Chart 3 provides a summary by age and Chart 4 provides race and ethnicity data.

Chart 3: Demographic data by Age

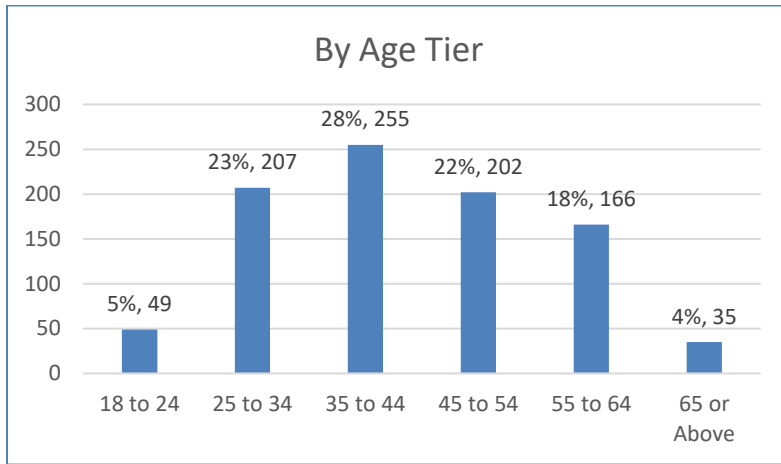


Chart 4: Demographic data by Race and Ethnicity

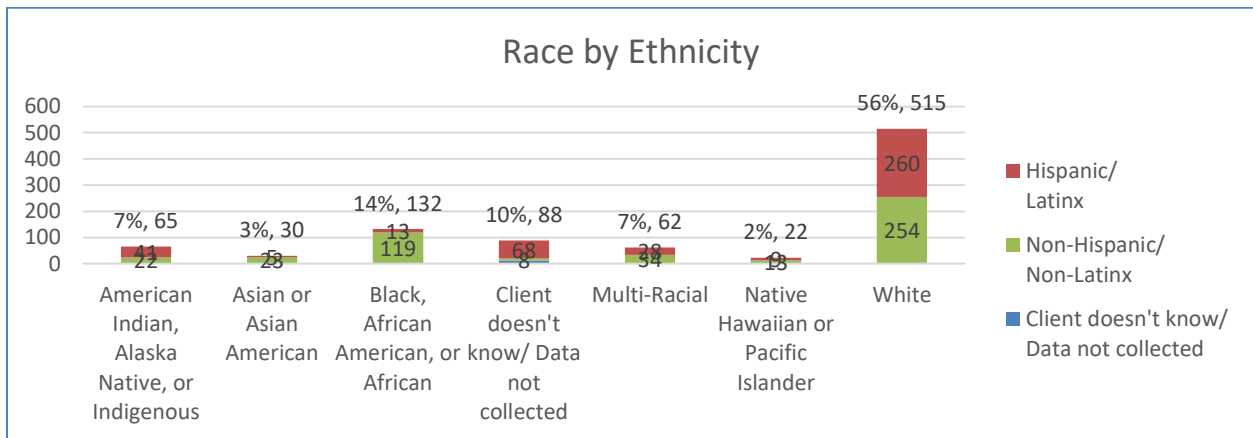
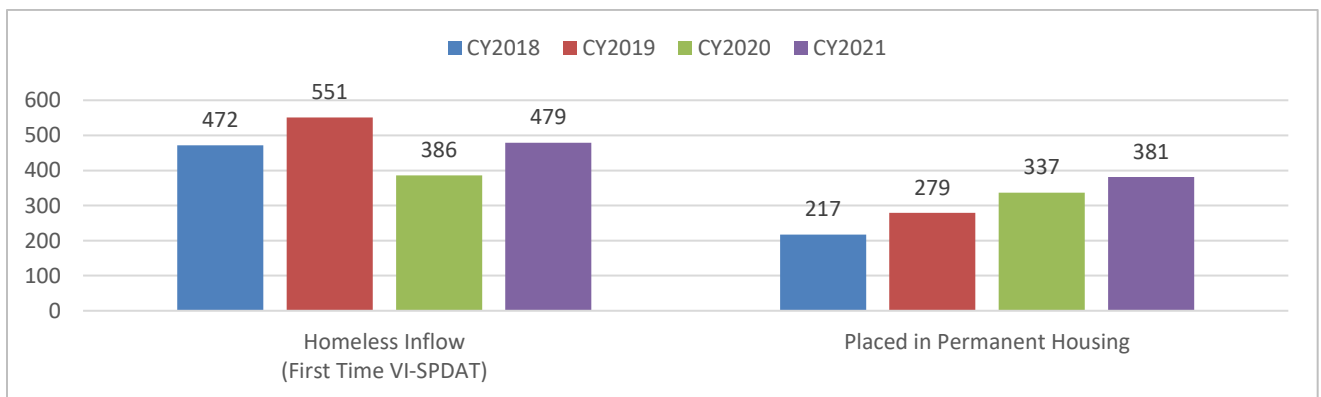


Chart 5: Homeless Inflow and Housing Placements for Domestic Violence Victims/Survivors



Other populations requiring services or housing assistance to prevent homelessness and other populations at greater risk of housing instability as defined by HUD in the Notice.

N/A

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 housing (Optional)

There are currently insufficient resources in our community to meet the need within these various programs. Between February 2022 and January 2023, approximately 3,614 households took the Vi-SPDAT assessment for the first time. During that same period, 2,129 households were housed. Chart 6 presents data on housing placements and inflow by project type and month. Specifically, the chart indicates the number of households that moved to permanent housing (housing placements) compared to the number of households completing their first housing assessment (inflow). This means that for every one household getting permanently housed 1.7 households are getting assessed for their first-time since becoming homeless.

Chart 6: Monthly Housing Placements v. Homeless Inflow (February 2022 – January 2023)

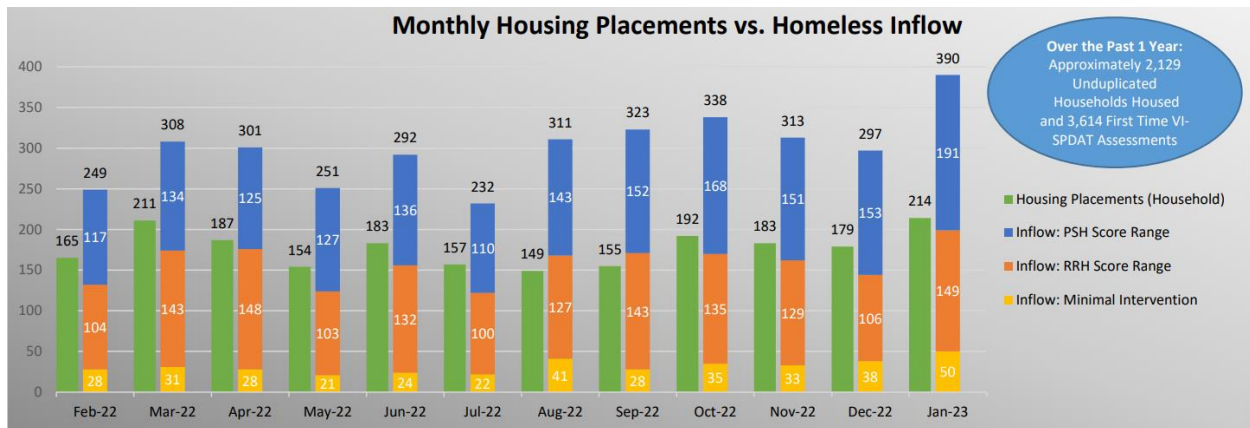
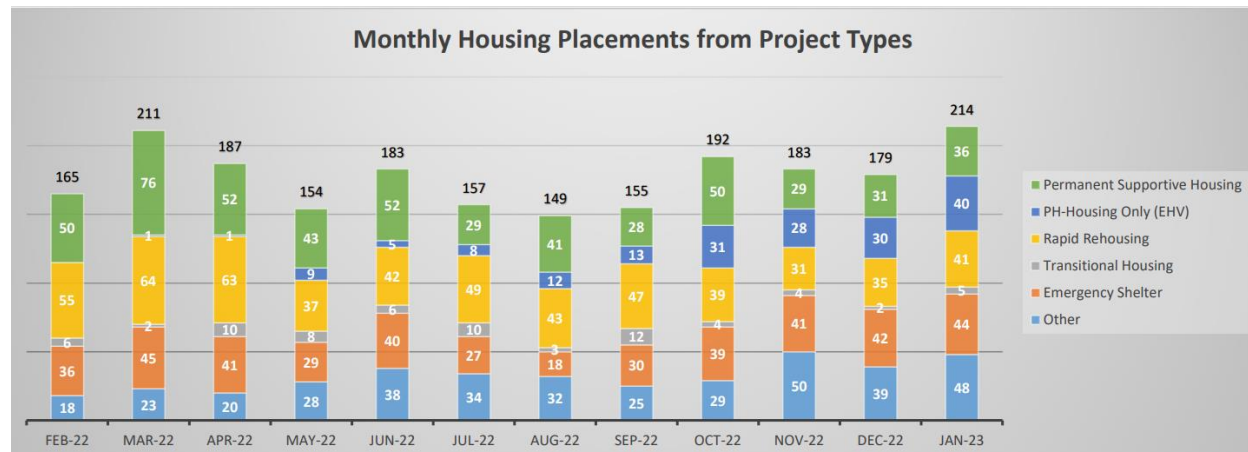


Chart 7 breaks down the housing placements by the type of project from which the household was receiving assistance. While the need remains high with 390 households becoming homeless for the first time in January 2023 and annual inflow increasing by 14% since February 2022, housing placements have increased by 11% over the same period with a greater proportion being families with children.

As of August 31, 2021, a total of 266 households with minor children were enrolled in a permanent supportive housing (PSH) program, and 616 households with minor children were enrolled in a rapid rehousing (RRH) program. New capacity is created when families exit the program or when new capacity is added to existing programs. On average, the countywide Supportive Housing System can assist about

360 homeless families obtain permanent housing each year. It is projected that roughly 600 new families will enter homelessness every year.

Chart 7: Monthly Housing Placements from Project Types (February 2022 – January 2023)



Similarly, there are insufficient temporary housing options for people seeking temporary shelter. As of January 2023, the Supportive Housing System had a temporary housing capacity of 2,176 units across the County. The shelter utilization fluctuates, and the Office of Supportive Housing is taking steps to increase program utilization which is currently low for emergency interim housing. As of March 21, 2023, there were a total of 884 households waiting on the Countywide Shelter Hotline including 321 households with minor children.

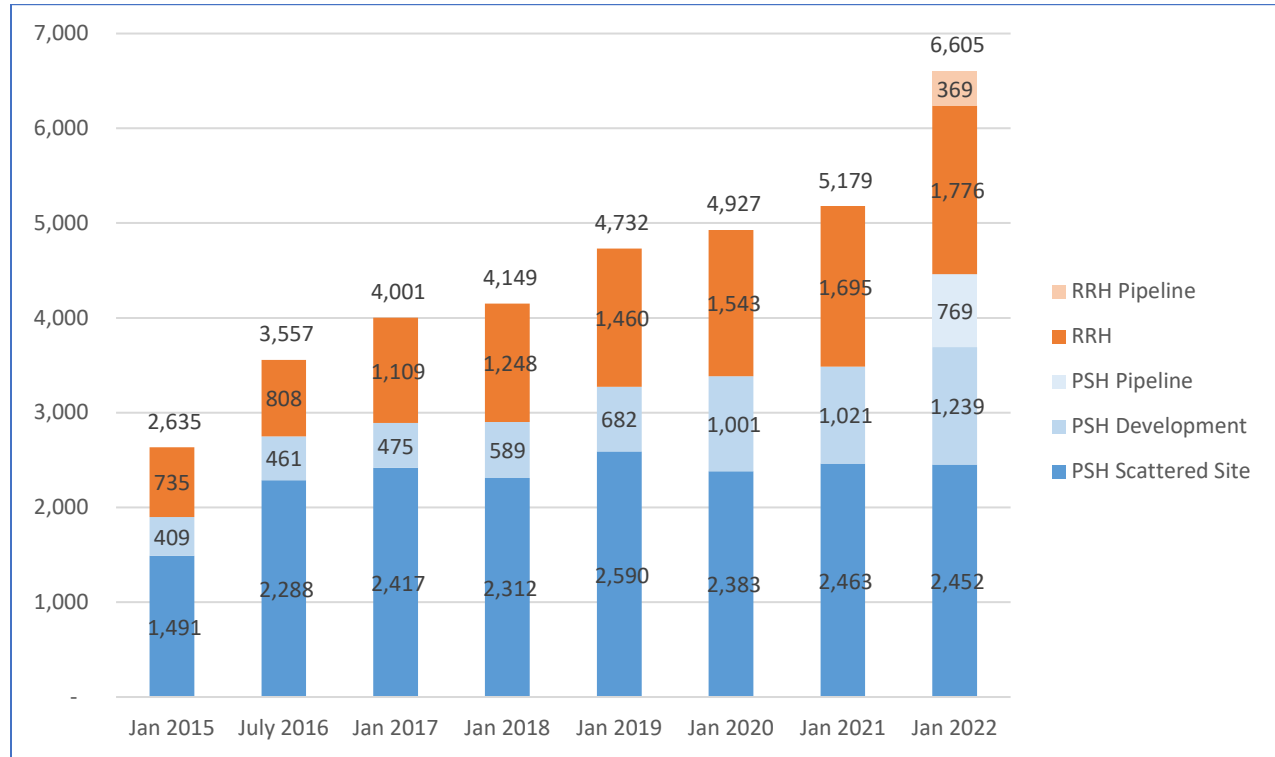
In 2016, voters in this county passed a \$950M affordable housing bond with a goal of financing 4,800 new affordable and supportive housing units for the most vulnerable members of our community including 1,800 units of permanent supportive housing. Given the low vacancy rate in the rental market and the high cost of living, the County has taken a lead role in the production of affordable and supportive housing. Table 1 shows the status of the previously approved developments. While the County only has a remaining balance of \$141 million, the Office of Supportive Housing anticipates meeting the goals of the housing bond.

Table 1: Status of Previously Approved Housing Bond Developments

Project Status	No. of Projects	No. of Units
In Operation	15	1,465
Under Construction	14	1,440
Secured All Financing	6	519
Waiting for Tax Credit Allocation	10	1,349
Waiting for Entitlements	1	TBD
Total	46	4,687

Since 2015 the County and its partners have made tremendous progress in increasing housing capacity. Chart 8 shows growth in the system but despite this growth the need continues to grow.

Chart 8: Growth in Housing Capacity (2015 – 2022)



Through a partnership with the Santa Clara County Housing Authority, the Supportive Housing System was able to leverage the one-time allocation of Emergency Housing Vouchers. Our community received 1,033 vouchers and we currently have approximately 400 households in housing search. The EHV’s represents the biggest growth in tenant based rental assistance program in the past six years. Of the families in housing search approximately 200 families have not been assigned a case manager to help provide them support after they are housed.

Finally, the Homelessness Prevention System Pilot has grown tremendously since it started in 2017. Today the system can support approximately 1,600 households. The Plan calls for an increase in the system to support 2,500 households annually. Most recently the demand for these services has increased dramatically particularly in the post pandemic time with rental protections expiring.

Describe the unmet housing needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

As of March 2023 there were a total of 5,967 unhoused individuals on the community queue. Of this total 86% are single adults, 8% includes households with children, 4% are youth clients, 2% are households without children. The Supportive Housing System has the capacity to serve 3,824 households who need a housing intervention of permanent supportive housing and has a utilization rate of 93%. Similarly, the system can support 1,715 households who require a rapid rehousing intervention and has a utilization rate of 83%.

For families with children the needs for temporary shelter and permanent housing is greater. While families only represent 8% of households waiting on the community queue the resources that have historically been dedicated just for families is not sufficient. As of May 27, 2021, the Supportive Housing System had the capacity to serve 239 households nightly, 90% of which is in non-congregate shelter units. The additional capacity reflects various new programs including, but not limited to, the County's Casitas program, a hotel program operated by Amigos de Guadalupe, a City of San José-funded hotel voucher program operated by Lifemoves, the Mountain View Homekey program, and the Evans Lane Emergency Interim Housing Program. The latter two programs opened in mid and late May 2021, respectively.

While we do not currently have sufficient capacity in the supportive housing system to house every single household we currently have a gap of providing supportive services to 200 families with children that are enrolled in our local campaign to end family homelessness. The County has received an infusion of one-time assistance of Emergency Housing Vouchers, a robust housing production pipeline, resources to support emergency interim housing and other non-congregate shelters. However, the one area of need that we have been unable to fill is around the supportive services that are needed by families with children that are enrolled in the Heading Home campaign.

At Risk of Homelessness as defined in 24 CFR 91.5

The Countywide Homelessness Prevention System pilot has a capacity to serve 2,161 households and has a utilization rate of 142%. With the expiration of the tenant protections, households are at higher risk of becoming homeless and the most recent average per household cost is approximately \$12,000. Most recently the Board of Supervisors approved additional funding to support approximately 500 additional households. The County is also working with the local Managed Care Plans who have made a commitment of \$10 million in funding to support families who are at risk of homelessness and with the Behavioral Health Services Department who has set aside \$3.5 million annually to support families who have a family member that is experiencing their first episode of psychosis and may become at risk of losing their housing.

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

Understanding the needs of those fleeing is difficult to measure. However, the Office of Supportive Housing in partnership with the City of San Jose and the Victim Services providers have been working together through a Housing Workgroup to better understand needs and gaps. A system gap exists because most existing RRH programs are limited to two years (at the most) and most existing permanent supportive housing (PSH) programs are for individuals who have disabling conditions and/or are chronically homeless, which are eligibility requirements for most PSH programs funded by the U.S. Department of Housing and Urban Development's (HUD) Continuum of Care Program (CoC Program). Unfortunately, this work is ongoing and the needs analysis for this subpopulation has not been completed.

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 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:

N/A the County is not proposing an additional definition.

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 County will be leveraging existing solicitations and contracts to meet this need. However, if there is a lack of capacity in existing providers, the County will include this service as part of an anticipated Request for Qualifications for Supportive Services. The County anticipates releasing this solicitation in late Summer and anticipates being ready to enter into contracts by January 2024.

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 PJs 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; the County will not be providing any of its administrative funds to a subrecipient or contractor.

Use of HOME-ARP Funding

	<u>Funding Amount</u>	<u>Percent of the Grant</u>	<u>Statutory Limit</u>
Supportive Services	\$3,059,972		
Acquisition and Development of Non-Congregate Shelters	\$0		
Tenant Based Rental Assistance (TBRA)	\$0		
Development of Affordable Rental Housing	\$0		
Non-Profit Operating	\$0	0%	5%
Non-Profit Capacity Building	\$0	0%	5%
Administration and Planning	\$539,994	15%	15%
Total HOME ARP Allocation	\$3,599,966		

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

The County will distribute HOME-ARP funds to fill supportive services gaps for literally homeless families that are enrolled in Heading Home, the ending family homelessness program. While there are insufficient resources in our community to meet the need, the HOME-ARP funds will fill the current services gap for families who have been enrolled in a housing program.

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:

While there are insufficient resources in our community to meet the need, the HOME-ARP funds will fill the current services gap for families with children.

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:

N/A; The County is not proposing to develop new affordable and supportive housing with the HOME ARP dollars.

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:

N/A; The County is not proposing to develop new affordable and supportive housing with the HOME ARP dollars.

Preferences

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

The County would like to adopt preferences for families with children amongst the four qualifying populations. Families with children within the qualifying populations will be prioritized for supportive services based on Coordinated Entry (CE), locally referred to as the Community Queue. The CE will be used for direct referrals.

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 HOME-ARP funds will fill the current services gap for families who are literally homeless, those that are enrolled in a housing program but are at risk of homelessness, families fleeing, and/or other families that have been enrolled in a housing program but for who the County does not have enough resources to provide the supportive services. Eligible households within the qualifying population will be identified using the Community Queue.

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 County will use the HOME-ARP funds to address the supportive services gaps identified in the needs assessment. The proposed preferences would not exclude or remove eligibility of any qualifying population. The Santa Clara County Supportive Housing System includes resources and housing interventions that serve other qualifying populations that are not included in the preference.

HOME-ARP Refinancing Guidelines

The County does not intent to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing.

- ***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; the County is not proposing to use HOME-ARP funding to rehabilitation existing multifamily housing.
- ***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; the County is not proposing to use HOME-ARP funding to rehabilitation existing multifamily housing.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
N/A; the County is not proposing to use HOME-ARP funding to rehabilitation existing multifamily housing.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
N/A; the County is not proposing to use HOME-ARP funding to rehabilitation existing multifamily housing.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
N/A; the County is not proposing to use HOME-ARP funding to rehabilitation existing multifamily housing.
- ***Other requirements in the PJ's guidelines, if applicable:***
N/A; the County is not proposing to use HOME-ARP funding to rehabilitation existing multifamily housing.