

HOME-ARP Allocation Plan Template with Guidance

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

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

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Template:

Describe the consultation process including methods used and dates of consultation:

The City of Clearwater developed a robust consultation process to meet HUD’s requirements and to ensure that the city is considering all priorities and needs within the community. On January 20, 2022, the City of Clearwater held a HOME-ARP Funding workshop to consult with local service providers, housing providers, and other groups that work to address the needs of qualifying populations. There were representatives from approximately a dozen organizations in attendance; further information about all consultation is detailed in the table below. In addition to a workshop, the city formed a selection committee, the Technical Review Committee (TRC), to score and select the projects for HOME-ARP Funding. The TRC met on February 18, 2022, and is comprised of several city staff, representatives from the Salvation Army, Pinellas Community

Foundation, and the Homeless Leadership Alliance of Pinellas. These are the agencies that uniquely serve the qualifying populations under HOME-ARP.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
City of Clearwater, City Council	Civic Leaders	Public Hearing	Approval of proposed project funding.
City of Clearwater, Neighborhood and Affordable Housing Board (NAHAB)	Other (Advisory Board)	Public Hearing	Recommendation to City Council to approve proposed funding.
City of Clearwater Economic Development and Housing Department	Other (City Departments); Grantee Department	Funding Workshop, Technical Review Committee, Public Hearing, Internal Communication	Work as part of TRC to evaluate projects and make recommendations about proposed funding. Work closely with local service providers to understand needs and make funding determinations.
Pinellas County Homeless Leadership Alliance	Continuum of Care; Services - Homeless	Funding Workshop, Technical Review Committee	Work as part of TRC to evaluate projects and make recommendations about proposed funding.
R'Club Childcare, Inc.	Services - Children	Funding Workshop	Make project funding requests and suggestions. Help to identify community needs and funding priorities.
The Salvation Army	Services – Homeless; Other (Services – Veterans, Human Trafficking)	Funding Workshop, Technical Review Committee	Work as part of TRC to evaluate projects and make recommendations about proposed funding.
Homeless Empowerment Program (HEP), Inc.	Services – Homeless; Other (Services – Veterans)	Funding Workshop	Make project funding requests and suggestions. Help to identify community needs and funding priorities.
Directions for Living	Other (Services – Mental Health)	Funding Workshop	Make project funding requests and suggestions. Help to identify community needs and funding priorities.

Hope Villages of America	Housing; Services – Victims of Domestic Violence; Other (Food Bank)	Funding Workshop	Make project funding requests and suggestions. Help to identify community needs and funding priorities.
Clearwater Housing Authority	PHA	Funding Workshop	Make project funding requests and suggestions. Help to identify community needs and funding priorities.
Pinellas Community Foundation	Foundation	Funding Workshop	Work as part of TRC to evaluate projects and make recommendations about proposed funding.
Blue Sky Communities	Housing	Funding Workshop	Make project funding requests and suggestions. Help to identify community needs and funding priorities.
Intercultural Advocacy Institute (ICAI)/Hispanic Outreach Center	Services – Children; Services – Education; Other (Civil Rights, Legal)	Funding Workshop	Make project funding requests and suggestions. Help to identify community needs and funding priorities.
Gulfcoast Legal Services	Services – Fair Housing; Other (Civil Rights, Legal)	Funding Workshop	Review project funding requests and make recommendations about which projects to fund.

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

All agencies were consulted through the HOME-ARP Funding Workshop and the Technical Review Committee. The Technical Review Committee, comprised of organizations representing Qualifying Populations, used input garnered from the HOME-ARP Funding Workshop to select projects for the HOME-ARP Allocation Plan. The priority needs identified through consultation with these organizations were additional affordable rental units, rental assistance, and rapid rehousing for homeless prevention. When considering applications submitted in response to the HOME-ARP NOFA, the Technical Review Committee selected projects that specifically addressed these needs.

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: 5/4/2022***
- ***Public comment period: start date - 5/4/2022 end date - 6/2/2022***
- ***Date(s) of public hearing: 6/2/2022***

Describe the public participation process:

In accordance with HUD guidelines, the City of Clearwater held a public comment period that was at least 15 days to obtain comments from Clearwater residents, agencies, and anyone else who wished to review and comment on the plan. Following the public comment period, the city held a public hearing with the Neighborhood and Affordable Housing Advisory Board (NAHAB) and with the City Council. The NAHAB is tasked with making recommendations to the City Council about the use of federal funds. The proposed funding activities are first heard by the NAHAB and then heard by the City Council, upon NAHAB's recommendation. The NAHAB public hearing took place on May 10, 2022, and the City Council public hearing for adoption of the substantial amendment to approve the HOME-ARP Funding Allocation Plan was held on June 2, 2022.

On September 10, 2023, a second public notice and public comment period was held for 30 days, for a substantial amendment to add Supportive Services as a proposed activity under the HOME-ARP Allocation Plan, and to reprogram funding accordingly. Following the second public comment period, the city held another public hearing with the NAHAB and City Council, on November 14, 2023, and November 16, 2023, respectively, to approve the substantial amendment to add Supportive Services and reprogram funding.

On March 19, 2025, a third public notice and public comment period was held for 30 days for a substantial amendment to reprogram HOME-ARP funding from Supportive Services and Tenant-

Based Rental Assistance (TBRA) to Affordable Rental Housing under the HOME-ARP Allocation Plan. Following the third public comment period, the city held public hearings with the NAHAB and City Council, on May 13, 2025, and June 5, 2025, respectively, to approve the substantial amendment to reprogram HOME-ARP funding to Affordable Rental Housing.

Describe efforts to broaden public participation:

The City of Clearwater published public notices for the NAHAB and City Council public hearings in an effort to broaden public awareness and participation in the development of the allocation plan. A 15-day public comment period is required; however, the city is holding a 30-day public comment period to allow more time for citizens to review the plan and provide comment. Additionally, the city followed its citizen participation plan, which guides all public participation efforts in a manner that promotes transparency and encourages active participation from residents, especially those qualifying populations.

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

Feedback received during the HOME-ARP Funding workshop and the public participation process identified an apparent need for affordable rental units, rental assistance, and rapid rehousing for homeless prevention, on which the City of Clearwater will focus its allocation.

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

All comments and recommendations were accepted and considered in the development of this allocation plan.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Template:

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	380	94	764	N/A	11								
Transitional Housing	87	35	199	N/A	55								
Permanent Supportive Housing	336	88	1,266	N/A	934								
Other Permanent Housing	0	0	20	N/A	20								
Sheltered Homeless						114	1,058	215	99				
Unsheltered Homeless						4	786	50	85				
Current Gap										N/A	N/A	N/A	N/A

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

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	20,029		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	600		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,815		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		2,855 (standard housing problems, not severe)	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,150 (standard housing problems, not severe)	
Current Gaps			N/A

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

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

Homeless as defined in 24 CFR 91.5

Homelessness affects all races and ethnicities; however, in Clearwater, white and black individuals are most impacted by homelessness. Of the 2,226 homeless individuals counted in the 2020 Point-In-Time counts for the continuum of care, 1,380 (nearly 62%) individuals were white, and 719 (over 32%) of individuals were black. The remaining 6% of homeless individuals identified as other minority races. Only about 7.6% of the total counted homeless population identified as Hispanic or Latino.

More than 83% of all homeless individuals counted were adults in households without children. There were 350 (nearly 16%) homeless individuals counted in households with children, and 22 homeless individuals counted in households that contained only children (under the age of 18).

At Risk of Homelessness as defined in 24 CFR 91.5

According to the FY 2021 Low- and Moderate-Income Summary Data, there are approximately 60,520 low- and moderate-income individuals within the City of Clearwater. This represents over 52% of the total population, based on the 2016-2020 American Community Survey. Of the city's 115 Block Groups, 42 Block Groups are characterized as having more than 51.00% of its population designated as low- and moderate-income. This suggests that a significant percentage of Clearwater's population has an income of less than 80% AMI and may be at increased risk of homelessness or in need of additional supportive services and assistance to prevent homelessness and housing instability.

According to 2011-2015 CHAS, there are 460 low- and moderate-income households (<80% AMI) that experience crowding of more than 1 person per room. Additionally, there are 3,115 households in the 0-30% AMI income group that are experiencing cost burden greater than 30%, and 2,755 households in the 0-30% AMI group that are experiencing cost burden greater than 50%. Due to crowding, income levels, and cost burdens, the households within these groups are at risk of homelessness.

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

In total, 184 (about 8%) homeless individuals counted identified themselves as victims of domestic violence. According to the Florida Department of Law Enforcement, there were 6,111 domestic violence offenses in Pinellas County alone in 2020. There were also 450 reports of rape in Pinellas County for the same year. Considering that Clearwater makes up approximately 12% of the total population in Pinellas County, it can be assumed that there may be 733 domestic violence offenses and 54 reports of rape that occurred within Clearwater. Victims of these crimes are susceptible to homelessness and housing insecurity.

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 2020 homeless Point-In-Time count identifies 265 homeless veterans, representing about 12% of the homeless population. According to the 2019 Homeless leadership Alliance HMIS report for the 1-year period between January 1, 2019, and December 31, 2019, it is estimated that there are 969 veterans experiencing homelessness each year and 518 veterans becoming homeless each year within the St. Petersburg, Clearwater, Largo/Pinellas County Continuum of Care. It can be assumed that there are nearly 1,500 veterans who experience or become homeless each year in Pinellas County, suggesting that about 180 veterans in Clearwater alone experience or become homeless each year.

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

There is a wide array of existing homelessness prevention services available in Clearwater, including counseling, legal assistance, mortgage assistance, rental assistance, utilities assistance, law enforcement, mobile clinics, street outreach services, drug and alcohol abuse services, childcare, education services, employment and employment training services, healthcare services, life skills training, mental health counselling, transportation services, and food banks.

In the Clearwater area, homeless services such as emergency shelter and transitional housing are provided by churches and non-profit organizations. Some of these organizations include the Homeless Emergency Project, Inc. (Homeless Empowerment Program), Kimberly Home, Boley Centers, Hope Villages of America, Salvation Army, and Family Resources, Inc., among others. To better address the needs of the area's homeless population, the Homeless Leadership Alliance maintains an online map-based directory of emergency shelter and transitional housing services, as well as food and clothing assistance targeted to homeless persons. The database connects to the Pinellas Suncoast Transit Authority route maps. Information regarding homeless resources is also disseminated through the 2-1-1 Tampa Bay Cares, Inc. hotline.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

In the Clearwater area, homeless services such as emergency shelter and transitional housing are provided by churches and non-profit organizations. Some of these organizations include the Homeless Emergency Project, Inc. (Homeless Empowerment Program), Kimberly Home, Boley Centers, Hope Villages of America, Salvation Army, and Family Resources, Inc., among others. These existing shelters and supportive service providers need additional funding to ensure satisfactory provision of services and future expansion of these services for those experiencing homelessness.

At Risk of Homelessness as defined in 24 CFR 91.5

The 5-year consolidated plan identifies priorities related to persons experiencing homelessness. Among these needs are substance abuse and behavioral/mental health services, services for homeless youth and youth aging out of foster care, homeless facilities and shelters, and case management. While there are existing shelters and supportive services for those experiencing homelessness, there may be a need for additional supportive services to prevent homelessness, including transitional housing, emergency assistance and other moving assistance (rental deposit assistance, security deposit), and other rental assistance and utility assistance efforts. These efforts also contribute to the maintenance and availability of affordable housing for all income groups, especially those qualifying populations.

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

Populations with unstable living environments may require additional financial assistance, such as rental assistance, down payment assistance, or utility assistance. These groups may also rely on transitional shelters and safe homes for temporary housing. Additional funding for organizations that provide these services would ensure that sufficient and decent housing is available for those that depend on it.

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

For those non-homeless populations, additional affordable rental housing units and supportive counseling is also needed to reduce existing homelessness and prevent future homelessness.

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

Clearwater has a robust shelter, housing, and service delivery system for those individuals experiencing homelessness and who are at risk of becoming homeless. Some identified gaps may exist, including sufficient funding to support the volume and reach of homeless supportive services (including non-profit service providers that offer substance abuse and mental health services, services for homeless youth, and case management). The city will continue to financially support these programs, when possible, and aid in the identification of additional funding sources, and provide technical assistance to aid in the completion of grant applications.

The city maintains a strong relationship with service providers, and included many of them in the consultation and production of this plan. The input received from these service providers during the consultation process was critical to the identification of needs. Their involvement ensures successful programming and lessens the existing gaps in providing homeless needs and other supportive services for qualifying populations.

The city is very engaged with the Pinellas County Homeless Leadership Alliance, supporting the organization in the implementation of the 10-Year Plan to End Homelessness; additional, improved, and maintained coordination between these service providers, and the city would

benefit those populations at risk of homelessness and those experiencing homelessness by promoting a transparent and accessible communication strategy. Improved coordination would increase the dissemination of information about critical resources and supportive services, as well as improve the quality of those services.

An identified gap is the need for additional transitional or permanent supportive housing; one way to reduce this need is for the city to coordinate with the continuum of care, non-profit service providers, and other organizations to encourage the development of these programs and these types of housing.

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:

Housing with 1 or more housing problems is associated with instability. As shown in the table above, there are 5,005 households earning less than 50% AMI with at least one housing problem. Additionally, households experiencing cost burden and crowding may be experiencing housing instability and be at a greater risk of homelessness. According to the 2011-2015 CHAS data, there are 460 low- and moderate-income households (<80% AMI) that experience crowding of more than 1 person per room. Additionally, there are 3,115 households in the 0-30% AMI income group that are experiencing cost burden greater than 30%, and 2,755 households in the 0-30% AMI group that are experiencing cost burden greater than 50%.

Identify priority needs for qualifying populations:

While there are a number of important priority needs, as listed in the city’s five-year consolidated plan, this allocation plan will focus on the priority needs listed below:

1. Affordable housing development (production of new rental units)
2. Facilities/Services for Victims of Domestic Violence (TBRA)
3. Rental Assistance
4. Homeless prevention (through diversion services, utility assistance, move-in assistance)

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:

The most recent Housing Inventory Counts (January 2021) and Point-In-Time counts (January 2020) were used to develop the data presented in the tables and narrative above. The 2011-2015 CHAS and 2016-2020 American Community Survey 5-Year Estimates were used to supplement the housing inventory and point-in-time counts. Based on reported numbers, there are currently sufficient shelter beds for those populations experiencing homelessness; however, it should be assumed that the reported count for homeless populations is an undercount. There is likely a gap in affordable housing for low- and moderate-income populations earning less than 50% AMI. There are only 600 units considered affordable to extremely low-income populations earning less

than 30% AMI and only 1,815 rental units affordable to populations earning less than 50% AMI. This leaves 17,614 rental units that are unaffordable to over 12,000 households that earn less than 50% AMI, according to the 2011-2015 CHAS data. Additionally, over 5,000 renter households with an income less than 50% AMI live in a house with one or more housing problems. This represents over 40% of the total low-income population earning less than 50% AMI, suggesting there is a need for additional decent, affordable rental units.

Gaps related to coordination and supportive services were identified using previous performance of similar programs and previously identified community needs, as identified in the 2020/2021-2024/2025 Consolidated Plan. Additionally, through the consultation process the city gauged needs and gaps based on outreach to service providers.

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:

The city accepted applications for proposed projects by local developers, service providers, and nonprofit organizations on the city's website. All proposed project applications submitted a description of the organization, a project description, and requested funding amount. The City of Clearwater developed a Technical Review Committee which was comprised of city staff and local service providers. This committee reviewed all applications for their compliance with the HOME-ARP program and benefits to qualifying populations to determine which projects to allocate funding to.

Describe whether the PJ will administer eligible activities directly:

Funding for eligible activities will be allocated directly to subrecipients with program compliance oversight and general administration/planning conducted by the city of Clearwater.

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:

Not applicable.

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	\$ 691,9380.00		
Acquisition and Development of Non-Congregate Shelters	\$ 0.00		
Tenant Based Rental Assistance (TBRA)	\$ 200,0000.00		
Development of Affordable Rental Housing	\$ 500,0001,391,938.00		
Non-Profit Operating	\$ 0.00	0 %	5%
Non-Profit Capacity Building	\$ 0.00	0 %	5%
Administration and Planning	\$ 245,629.00	14.99 %	15%
Total HOME ARP Allocation	\$ 1,637,567		

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

The following list includes descriptions of the proposed activities and their desired impact to address the gaps and priority needs:

1. HOME-ARP Supportive Services

Amount Requested: \$691,9380

Purpose of Funding: If HOME-ARP funding becomes available, The City of Clearwater will contract with subrecipients to provide supportive services to Qualifying Populations under the HOME-ARP program. The supportive services to be contracted will be eligible costs for McKinney-Vento Supportive Services and Homeless Prevention Services, including but not limited to housing search and counseling services, life skills training, case management, landlord/tenant liaison services, and financial assistance costs.

2. HOME-ARP Tenant-Based Rental Assistance (TBRA)

Amount Requested: \$200,0000

Purpose of Funding: If HOME-ARP funding becomes available, The City of Clearwater will contract with subrecipients to assist Housing Choice Voucher (HCV) participants with HOME-ARP TBRA to obtain security deposit assistance. Participants must be HOME-ARP Qualifying Populations who reside within the city limits of Clearwater. Any portion of the proposed amount of \$200,000 not used for HOME-ARP TBRA will be applied towards HOME-ARP Supportive Services and/or HOME-ARP Affordable Rental Housing.

3. HOME-ARP Affordable Rental Housing

Amount Requested: \$500,0001,391,938

Purpose of Funding: The City of Clearwater will contract with subrecipients to produce or preserve affordable rental units for HOME-ARP Qualifying Populations. If the

production of affordable rental units is not feasible, the proposed amount of \$500,000,391,938, or any portion of that amount not used, will be applied towards HOME-ARP Supportive Services and/or HOME-ARP TBRA.

As applicable to the activities described above, HOME-ARP Qualifying Populations are described as: Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a)); At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1)); Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary; Other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability; and Veterans and families that include a veteran family member that meet one of the preceding criteria.

Projects associated with these activities may include supportive services, tenant-based rental assistance, and/or development of affordable housing. Per HUD guidance and communication with city staff, the city will keep record of funding that is spent as supportive services and how many households benefit from this funding. These data will be monitored for future reporting.

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

As previously identified in the above sections, the qualitative and quantitative data presented indicates a need for projects that support the identified priority needs (additional affordable housing, homeless prevention, rental assistance, and related supportive services), and those that close the gaps in service delivery (increased capacity for coordination, increased capacity to support homeless populations and those at risk of becoming homeless, and those in transitional housing).

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:

The City will allocate HOME-ARP funds for affordable housing development. The funds will aid in the development of 26 affordable rental housing units reserved for qualifying populations. Additionally, 85 households will be assisted through TBRA. Supportive services are estimated to benefit 222 persons or households. Any portion of that allocation not used for affordable rental housing will be applied toward HOME-ARP Supportive Services and/or HOME-ARP Tenant-Based Rental Assistance (TBRA).

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:

The City of Clearwater's 2020/2021-2024/2025 Consolidated Plan identifies the goal of affordable housing, and estimates that 95 rental units will be constructed during the 5-year consolidated planning period. Together, this 5-year goal and the HOME-ARP Affordable Rental Housing project work towards addressing the city's identified high priority need of new housing construction for both renters and owners.

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:

The city of Clearwater does not intend to give preference to one or more qualifying populations.

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:

Not applicable.

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):

Since the city of Clearwater will not administer HOME-ARP projects directly (except for administration/planning), the city defers to the Continuum of Care's referral methods and coordinated entry procedures. The Homeless Leadership Alliance (HLA) is the Continuum of Care for the region, including the city of Clearwater. The HLA outlines their Coordinated Entry and referral procedures here:

<https://static1.squarespace.com/static/5c784173a9ab953d5ee017d5/t/6231ef1c5e2a23775310a130/1647439647497/CE+Policies+and+Procedures+with+Attachments.pdf>

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):

The city will work with the HLA for coordinated entry procedures. Projects including referral activities will be completed by corresponding HOME-ARP subrecipients.

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):

Since the city of Clearwater will not administer HOME-ARP projects directly (except for administration/planning), subrecipients are responsible for decisions related to referral method prioritization, where relevant.

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):

Since the city of Clearwater will not administer HOME-ARP projects directly (except for administration/planning), subrecipients are responsible for decisions related to referral method prioritization, where relevant.

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:

The city of Clearwater does not intend to limit eligibility for a HOME-ARP rental housing or NCS project to a particular Qualifying Population or specific subpopulation of a Qualifying Population. Any individual who belongs to any of the Qualifying Populations under HOME-ARP is eligible to benefit from the selected projects.

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:

The city of Clearwater does not intend to implement a limitation to a particular Qualifying Population or specific subpopulation of a Qualifying Population. Any individual who belongs to any of the Qualifying Populations under HOME-ARP is eligible to benefit from the selected projects.

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):

Not applicable.

HOME-ARP Refinancing Guidelines

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***
Not applicable. The city does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental 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.***
Not applicable. The city does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
Not applicable. The city does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
Not applicable. The city does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
Not applicable. The city does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***Other requirements in the PJ's guidelines, if applicable:***
Not applicable. The city does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.