



City of Miami

**HOME American Rescue Plan (ARP)
Allocation Plan – DRAFT**

Draft Issued: October 27, 2022

All comments related to this draft can be e-mailed to communitydevelopment@miamigov.com, faxed to 305-416-2090, or mailed to: City of Miami, Dept. of Housing & Community Development, ATTN: George Mensah, 14 NE 1 Ave., Second Floor, Miami, FL 33132. All comments submitted must include the first/last name, mailing address, and contact information (email or phone) of the commenter.

Anyone requiring special accommodations to access this document, including language assistance, should contact communitydevelopment@miamigov.com or call 305.416.2080.

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:

This HOME-ARP allocation plan was prepared in consultation with agencies whose clientele includes the HOME-ARP qualifying populations (QPs).

- **Homeless populations**, 24 CFR 91.5 (1), (2), (3)
- **At risk of homelessness**, 24 CFR 91.5
- **Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking**
- **Other populations** who do not qualify under any of the populations above but meet one of the following criteria:

- families requiring services or housing assistance or to prevent homelessness
- those at greatest risk of housing instability

NOTE: Although not a separate QP, veterans and families that include a veteran family member that meet one of the preceding criteria qualify.

The City of Miami Department of Housing & Community Development (HCD) would be administering the funds which amount to a total of \$12,720,427. A list of organizations consulted to date by HCD is noted below. An initial virtual consultation session was hosted on March 1, 2022, for the largest agencies serving homeless needs. The Miami-Dade County Homeless Trust, which serves as the area’s Continuum of Care (CoC), was included. Subsequently, the City contacted other agencies via phone and/or e-mail to further gather their input/comments on the needs of their qualifying populations and to gather feedback on the QP’s needs. An electronic survey was widely distributed to local agencies and organizations that work with people experiencing homelessness, people fleeing domestic violence, justice-involved individuals, veterans, people with low incomes, and other qualifying populations.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Homeless Trust/Continuum of Care (CoC)	CoC, Quasi-County Agency	Teams meeting/e-mails	Would like to see funding prioritized for the homeless, for rehousing and adding units to the pipeline. Questioned if partners knew of existent properties that could be rehabbed, Mentioned the consideration of HOME ARP acquisition and/or start-up supportive services funding in project for the homeless at an outside-of-City location. At least two possible locations have been identified. CoC also submitted letter to Mayor/City Manager in March 2022.
Miami-Dade County Public Housing & Community Development Dept. (PHA)	County Department and Public Housing provider	Phone call; e-mail	Discussed how they would be implementing their HOME-ARP allocation including acquisition of a location for up to 120 seniors/vulnerable households in North Miami as bridge permanent housing. No preference identified.
City of Miami Homeless Program Administrator, Dept. of Human Services	City Dept., homeless service provider	Phone call; Survey.	Lack of affordable housing and shelter units. Priority needs of affordable housing development and rental assistance.
Carrfour Supportive Housing	Non-profit, supportive housing provider	Teams meeting	They have a site within City limits (Little Haiti area) for future supportive housing; could it be part of a larger development?
Camillus House	Non-profit	Teams meeting	Set aside ELI units in tax credits are often unattainable for persons in the CoC due to tenant qualifications.
Chapman Partnership	Non-profit	Survey	Lack of available quality affordable housing and living wages. Priority needs of affordable housing development and supportive services.

Citrus Health	Non-profit	Teams meeting; Survey	Look at one-size-fits-all qualifications for tenancy in tax credits for 30% AMI and below HH; there is a need for lowering barriers to rental housing entry. Priority needs of more rental assistance and the need for affordable housing development given the lack of the latter. Keep service dollars in mind.
Hope Inc. (FHIP)	Non-profit	Teams meeting	Attended but provided no comments.
Domestic Violence Oversight Board, Miami-Dade County	County Advisory Board	Phone call; email	Provided email information for members so that surveys could be issued. Also provided Gap document (data).
Special Projects Administrator at Miami-Dade Police Department & Task Force Coordinator for the South Florida Human Trafficking Task Force	County Dept.	E-mail	Provided data that has been integrated into the plan.
Miami-Dade County – Commission on Disability Issues	County Advisory Board		Seeking feedback as of 10/2022.
Sundari Foundation, dba Lotus House	Non-profit	Survey	Priority needs of supportive services and rental assistance for families on a very limited income.
Advocate Program, Inc.	Non-profit	Survey	Need for affordable housing and shelter placement given the increase in families becoming homeless. Living wage also an issue. Priority needs of affordable housing development and rental assistance.
South Florida Behavioral Health Network	Non-profit	Survey	Addressing convicted felons who are homeless. Priority needs of acquisition/development of non-congregate shelter units and supportive services.
The Salvation Army	Non-profit	Survey	Main need is not enough affordable housing for the low-income HH in Miami-Dade County. Priority needs of affordable housing development and supportive services.

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

The agencies listed provided the City with distinct feedback and responses, noted in the chart above, lending insight on how they believe they can better serve the qualifying population(s) whom they work with. Overall, the lack of affordable housing for the low and extremely low income was the most prevalent, consistent mention.

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: 10/27/2022***
- ***Public comment period: start date – 10/27/2022 end date - 11/10/2022***
- ***Date(s) of public hearing: 11/8/2022, Scheduled to go to City commission date in December 2022***

Describe the public participation process:

The draft HOME-ARP Allocation Plan was made available for public review and comment on October 27, 2022, on both the HCD website at www.miamigov.com/HOME-ARP and in hard copy at the HCD office. The notice of the public hearing and availability of the draft Allocation Plan was published in *The Miami Herald* on 10/27.

Describe efforts to broaden public participation:

On March 1, HCD held a Teams consultation meeting with several non-profits in the homeless/at risk of homelessness sector to commence discussion and the data gathering process towards the drafting of the Allocation Plan. The advertised Public Notice of the draft plan will also be shared with an email list the Department has put together of 90+ stakeholders and/or service providers who work with the QPs. HCD also reached out to them via an e-survey earlier in the Summer of 2022 to request their feedback on needs and priorities. The data tied to the responses received was noted in the chart above. The DHCD also created a dedicated web page for the HOME-ARP program.

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

Still in process. This section to be updated once public comment period has ended.

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

All comments or recommendations will be accepted and a response to each comment will be provided.

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	1076	295	1333	#	0								
Transitional Housing	192	61	392	#	88								
Permanent Supportive Housing	1481	392	2828	#	909								
Other Permanent Housing	115	32	207	#	25								
Sheltered Homeless						1054	1251	105	126				
Unsheltered Homeless						0	970	26	179				
Current Gap										0	0	680	680

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

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

Homeless as defined in 24 CFR 91.5

The 2022 Point-In-Time (PIT) count in the CoC which spans all of Miami-Dade County, was held on January 27, 2022, and registered a slight (2%) increase in the total count of homeless persons (sheltered and unsheltered) County-wide from the previous year's Jan. PIT. The 2022 PIT identified 970 persons who were **unsheltered in the County**; the majority of those persons (591) were *within City of Miami limits*, accounting for a 6% increase of unsheltered persons within City boundaries, from the previous year. The increase is of concern to City administrators and residents. The City of Miami is the oldest and most populated municipality within Miami-Dade County which counts with a total of 34 incorporated municipalities. As such, many homeless services and facilities have historically been in the County's downtown area, which is within the City of Miami's geographic limits.

The 2022 PIT count identified 2,306 **sheltered persons in the County**. Of this total, 1,908 persons were *in emergency shelter*. Besides this another 382 people were in *transitional housing*, and 16 were in *Safe Haven*. Of the homeless subpopulations in both the sheltered and unsheltered category, the largest is adults with serious mental health disorders (1,046) and substance use disorders (533).

The CoC's summer census, held on August 18, 2022, noted an increase in the number of homeless with an estimated 1,140 **unsheltered persons** and 2,598 **sheltered persons** reported in the County, an 11 percent increase from the previous Summer Census. When focusing on unsheltered numbers solely within City of Miami limits from August 2021 (510 persons) to August 2022 (640 persons), there was a 25 percent increase. The Housing Trust (CoC) indicates that homeless numbers tend to swing higher in the summer months.

At Risk of Homelessness as defined in 24 CFR 91.5

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability (e.g. moving two or more times during the last 60 days due to economic reasons).

The last available Comprehensive Housing Affordability Strategy (CHAS) data spans 2015-2019 and indicates that close to a third (31.6%) of City of Miami households (56,015) have incomes less than or equal to 30% HAMFI (HUD Area Median Family Income). The majority of these (just over 80%) are renter households. With inflation on the rise nationwide and locally, the City's median income is noted at \$44,268 (*US Census QuickFacts, 2016-2020*), which means cost burdened households cannot afford the higher rents seen within the City and County in 2022, making many of them very vulnerable to housing instability whereby saving money for emergencies, weather-related disasters, and/or potential relocation becomes extremely difficult. According to a more recent report issued by Realtor.com¹, home rents in the Miami-Fort Lauderdale-West Palm Beach metro area climbed more than 55% year-over-year as of Feb. 2022, making it the greatest spike on a national level. This spike adds more stress to lower-income households.

When we analyze the most recent SAGE HMIS Reporting Repository data for a snapshot of those in the category of families requiring services/housing assistance to prevent homelessness. In the first quarter of 2022 (1-1-22 through 3-31-22), 401 persons were in the City's Hotel/Motel voucher program, 173 persons were in the homeless prevention program, and 179 persons were in the rapid rehousing program. Adding these numbers up amounts to some 750 persons per quarter that are housed via temporary or emergency assistance or need additional housing assistance.

¹ [February Rental Report: Sun Belt Metros See Highest Rent Growth and Low Affordability - Realtor.com Economic Research](#), March 23, 2022

In the past several decades, the City of Miami’s real estate market has been dynamic, weathering both highs and lows. According to the latest Annual Rent Report from Zumper, Inc., the largest privately owned rental platform in North America, the median monthly rent just for a one-bedroom apartment increased *by 38.29%* in Miami, to \$2,280, over the past year — the highest increase in the country. The national average was 11.6 percent. The 2020 American Community Survey 5-Year Estimates indicate that 21.5% of Miami’s total population (442,241) lives in Poverty (S1701) with close to 30% of that population 65 years and over. Of the total City population, close to 20% have no health insurance. Miami’s median income (\$44,268) is also lower than that of Miami-Dade County’s (\$53,975) and the State of Florida (\$57,703).

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

For HOME-ARP, this population includes the categories noted above as well as cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit.

In the most recent available reports issued by the Florida Dept. of Law Enforcement (calendar year 2020) on the state’s Uniform Crime Reports on Domestic Violence, data indicates that there were a total of 1,212 total offenses/761 arrests in the City of Miami, and 7,470 total offenses/3,612 arrests County-wide (all of Miami-Dade County’s police agencies).² Those numbers were lower than the ones logged in calendar year 2019; 1444 offenses/884 arrests in the City of Miami, and 8,160 offenses/4,188 arrests County-wide. Meanwhile, data indicates that the County’s Community Action & Human Services Dept.’s domestic violence shelters provided services to 1177 program participants since Feb. 2020.

Florida ranks third in the U.S. in human trafficking. Human Trafficking (HT) is defined as any act that involves the recruitment, transportation, harboring, sale, or receipt of persons through coercion, force, abduction, and/or deception or fraud, for the improper purpose of placing them in a situation of forced labor, sexual exploitation, domestic servitude, debt bondage or other slavery-like practice. Locally, these cases are handled by Police in cooperation with the State Attorney’s Office. Miami-Dade County’s Coordinated Victims Assistance Center (aka CVAC) provided the data in the table below indicating the number of HT victims assisted during the last three calendar years, County-wide. Keep in mind, that only five months of 2022 are reported in the last available report.

OVC Services for Victims of Human Trafficking Clients Served by Year at CVAC (Miami-Dade County) Total Number of Human Trafficking Victims Assisted				
Trafficking Type	Year Served			
	2019	2020	2021	2022 (Jan. to May)

² [https://www.fdle.state.fl.us/FSAC/Documents/Annual/Domestic-Violence/DV_Jurisdiction_Offenses_2020-\(3\).aspx](https://www.fdle.state.fl.us/FSAC/Documents/Annual/Domestic-Violence/DV_Jurisdiction_Offenses_2020-(3).aspx)

Sex Trafficking	16	17	30	31
Labor Trafficking	18	24	22	21
Sex and Labor	16	21	19	64
Total Clients Assisted	50	62	71	116

- Data obtained from TIMS

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

As per issued guidance, the “*Other populations*” QP is for those persons who do not qualify under any of the other QPs but meet one of following criteria:

- (1) families requiring Services or Housing Assistance or to Prevent Homelessness
Households (i.e., individuals and families) who:
 - have previously been qualified as “homeless” as defined in 24 CFR 91.5
 - are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and
 - need additional housing assistance or supportive services to avoid a return to homelessness
- (2) those at Greatest Risk of Housing Instability means a household that has:
 - Annual income \leq 30% of area median income and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs); OR
 - Annual income \leq 50% of area median income and meets one of the conditions in paragraph (iii) of “At risk of homelessness” definition at 24CFR91.5

When taking the definitions provided for this QP, there would seem to be a potential overlap between this category and that of the *At Risk of Homelessness* category. When looking to the CHAS data (2015-2019 ACS), estimates indicate that 33,970 households with annual incomes of 30% of AMI or below, inclusive of both the owner and renter categories, are experiencing **severe cost burden** (more than 50% of monthly income towards housing costs). For reference, the CHAS reports a total of 176,775 households.

When looking at the SAGE HMIS Reporting Repository data for a snapshot of those in the category of families requiring services/housing assistance to prevent homelessness. In the first quarter of 2022 (1-1-22 through 3-31-22), 401 persons were in the City’s Hotel/Motel voucher program, 173 persons were in the homeless prevention program, and 179 persons were in the rapid rehousing program. Adding these numbers up amounts to some 750 persons per quarter that are housed via temporary or emergency assistance or need additional housing assistance.

Veterans and families that include a veteran family member that meet the criteria for one of the qualifying populations described as at *Greatest Risk of Housing Instability* above are also eligible to receive HOME-ARP assistance. At the time of the Jan. 2022 PIT Count there were 131 veterans, 26 unsheltered and 105 sheltered. The majority of veterans (120) were males and Non-Hispanic (108). Data indicates that 29 veterans were considered chronically homeless, when looking to both the sheltered/unsheltered categories.

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):

Recent CARES Act allocations for the City of Miami were used to assist some of the QPs. In April 2021, the City awarded just over \$5 million in ESG-CV funding to Camillus House to provide rapid rehousing and homeless prevention activities to qualifying City residents. As of the Summer of 2022, those funds were fully committed. A one-time CARES Act allocations under the Housing Opportunities for Persons With AIDS (HOPWA-CV) was allocated to provide temporary rental assistance to persons with HIV/AIDS via the STRMU (Short-term Rental Mortgage and Utility Assistance) program. Finally, ERA1 and ERA2 allocations of just over \$30 million via the U.S. Treasury Emergency Rental Assistance Program assisted over 3,000 rental households who were 80% AMI and below, and financially affected due to, or during, the pandemic, providing them with rental and utility relief (running from March 2021 through July 2022). The City closed the ERA program's application period once funds had been exhausted but anticipate a reopening sometime around Dec. 2022, based on a new allocation of funding.

Typically, the City receives an annual allocation of approximately \$450,000 in Emergency Solutions Grant funding which it awards towards Homeless Prevention and Rapid Re-housing Efforts, along with funding Street Outreach efforts. Other current resources available to assist qualifying populations in the City of Miami (as a jurisdiction of Miami-Dade County) are listed below:

Congregate and non-congregate shelter units

The 2021 Housing Inventory Count (HIC) identified 8,686 year-round beds in the CoC, 3,023 in the Emergency/Safe Haven/Transitional Housing category and 5,665 in the Permanent Housing category. Of the permanent units 1,086 are specifically for veterans and 108 beds in the transitional category are for veterans.

Two Miami-Dade County transitional housing programs (Inn Transition South and Inn Transition North) provide traditional housing, advocacy and supportive services to victims of domestic violence and their dependents. Another four Miami-Dade County certified domestic violence shelters (SafeSpace Empowerment Center, SafeSpace Central, SafeSpace South and SafeSpace North) provide temporary emergency shelter, advocacy and support services to victims of domestic violence, and their dependents.

Individuals and Families at Risk of Homelessness

Individuals and families at risk of homelessness may need housing assistance which could include eviction assistance, rent and utility assistance, in addition to other types of supportive services. Households who need assistance with maintaining or regaining housing to prevent homelessness will benefit from targeted services. Services that may be needed to assist individual and families at risk of homelessness include:

- **Short-term subsidies** – Besides the City of Miami ERA program mentioned above, which closed its application period in July 2022, the City also provides funding to the local, long-running HPRP program known as HAND that assists homeless prevention and rapid rehousing qualifying candidates. The latter program is also funded by Miami-Dade County which also operates its own voucher and mod-rehab programs.
- **Mortgage assistance** - the HOPWA funded Short-term Rental, Mortgage, and Utility Assistance (STRMU) Program is administered by HCD and provides mortgage assistance or temporary rental assistance to income-eligible households who are 80% AMI and include a member who is HIV+ in the County. In March 2022 the State of Florida launched the Mortgage Assistance Program known as **Homeowner Assistance Fund (HAF)** to aide eligible homeowners (related to a primary residence) with mortgage delinquencies, defaults, foreclosures, and displacements, as well as loss of utilities, home energy services, and insurance. The HAF program closed on July 31, 2022, due to the exhaustion of funds.

TBRA

The neighboring jurisdictions of Miami-Dade County and the City of Miami Beach were awarded close to 500 Emergency Housing Vouchers (EHV) for families who are homeless, at-risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability. Also, the CoC operates a Permanent Supportive Housing (PSH) Tenant-Based Rental Assistance (TBRA) program which offers long-term rent subsidy similar to Section 8 Housing Choice Vouchers to homeless households with disability which are accessed via the CoC's Coordinated Entry Process in accordance with the CoC's Orders of Priority.

Supportive Services

The CoC (Homeless Trust) has also identified its strategy of continuing to maximize the use of community-based resources, by collaborating with Head Start, Catholic Legal Services, Veterans Affairs, Faith-Based Organizations, Managed Care, Greater Miami Legal Services, OIC of South Florida, PACE Centers, Career Source, Parent to Parent, Advocacy Network on Disabilities. As indicated in the latest update of its Community Homeless Plan, 2022: Priority Home³, the CoC has identified a strategy of funding Food and Beverage (F&B) tax to fund gaps in support services to leverage new Permanent Supportive Housing.

Back in January of 2022, City of Miami Mayor Francis Suarez announced his *Functional Zero Plan* with an ambitious goal of making Miami the first major city in America to reach functional zero for chronic homelessness. The Functional Zero Plan aims to deploy \$3.1 million dollars in federal American Rescue Plan Act (ARPA) funds directly to longtime community partners in Miami with a proven track record in helping the most vulnerable, including Lotus House (\$200,000), Camillus House (\$2 million), the Chapman Partnership (\$200,000) and the Miami Center for Mental Health & Recovery (\$750,000).

According to reports, almost half of the funding has been earmarked for supportive services to continue partnerships with Miami Dade College and Florida International University to provide on-site workforce related programming such as culinary arts, hotel maintenance, construction trades and forklift operator training classes. Some funding will go towards street outreach efforts including an expansion of the Lazarus/Matt Talbot specialized outreach program that targets the chronic mentally ill homeless and those with severe and persistent substance abuse issues and placing trained case managers with the regular street outreach teams to prepare the documentation needed to move homeless people on the street who are shelter-resistant but ready for housing, directly into apartments. Finally, around \$125,000 will go towards the City of Miami's Specialized Police Homeless Unit (HEAT team) funding emergency beds to immediately assist people and provide an immediate alternative to those unhoused, with placement at Camillus.

Functional Zero means that a community has measurably ended homelessness for a given population, and when homelessness does occur, it's rare and brief. By partnering with multiple community stakeholders, the City's Functional Zero Plan intends to end chronic homelessness by providing job training opportunities, identifying housing solutions, and expanding mental health as well as substance abuse services within the City of Miami. Back in 2018, the Homeless Trust announced that Miami had reached functional zero for veterans experiencing homelessness.

Street Outreach (SO) is provided to unsheltered homeless persons in the City via the staff of Miami Homeless Assistance Program (MHAP), a division of the City's Department of Human Services. The team ensures that people sleeping on the streets are prioritized for assistance in the same manner as any other person assessed through the CoC's Coordinated Entry process. Staff locate, identify, and build relationships with the unsheltered population to provide immediate support, intervention, and connections with homeless

³ [2022-mdc-homeless-plan.pdf \(homelesstrust.org\)](https://www.homelesstrust.org/2022-mdc-homeless-plan.pdf)

assistance programs and mainstream social services/and or housing programs. MHAP also assists persons on the street with obtaining necessary documentation (homeless verification, birth certificates, IDs and social security cards) and makes referrals to community services and resources. Street Outreach (SO) includes two specialized behavioral health outreach teams, Camillus House's Lazarus Project and New Horizon's PATH program. SO workers follow the HMIS workflow, which includes collection of the HMIS Notices and Disclosure and HMIS Consent to Release and Exchange of Information.

Coordinated Victims Assistance Center (CVAC) - A Miami-Dade County one-stop, non-residential center for victims of domestic violence, sexual assault, dating violence and human trafficking, the CVAC provides on-site coordinated services in collaboration with community partners, faith-based organizations, universities, nonprofit agencies and other governmental agencies. According to available information, the CVAC along with five DV Outreach Units in the County and operated via the Eleventh Judicial Circuit of Florida, extend 38 different services to their clients from including everything from Crisis Counseling to Domestic Violence Legal Representation, Empowerment/Educational Support Groups, Employability Services, Filing Criminal Cases/Police Report, etc.

Affordable and permanent supportive rental housing

The City operates a small Housing Choice Voucher program (179), a Moderate Rehabilitation program (206 units), and the HOPWA LTRA program (800). Available data indicates that within City limits, there are approximately 178 privately owned buildings (which have received some type of public funding) offering a total of approximately **14,900** affordable and/or supportive rental units presently in use, for low to moderate-income persons, in different income categories. These buildings are spread out throughout the City's five districts. However, given Miami's area median income, and escalating rents in the private sector, the supply is always short of the demand. The City has limited sources to help fund affordable housing, and no dedicated revenue source. The largest allocation in recent years has come from the General Obligation Bonds (GOB), passed by Miami voters in late 2017, and dedicating \$100 million to specific affordable housing efforts. To date, approximately \$23 million in bond funds have been allocated towards multi-family affordable and/or workforce housing, contributing towards 1,300 units in different stages of production. Although the City continues to look into creative ways to add to the supply, but given existent land costs and escalating construction costs, development of units for the extremely low income (ELI) has become more and more difficult.

Meanwhile, according to Miami-Dade County's HOME-ARP Allocation Plan, the CoC operates 5,172 in Permanent Supportive Housing beds (as of Summer 2022). However, there is a need for more supportive housing pairing deeply affordable housing with tenancy support services for the homeless, and those at risk of homelessness. According to the recently issued [*Corporation for Supportive Housing \(CSH\) National Supportive Housing Needs Assessment*](#), Florida's greatest supportive housing needs come from the elderly/aging, jail, and prison systems. The report does not provide County-specific data.

Describe the unmet housing and service needs of qualifying populations:

To assess the unmet needs of Qualifying Populations, the City looked to available reports and data in order to be able to identify gaps within the current shelter and housing inventory, as well as the service delivery system. Data sources referred to for this determination included the City's 2019-2023 Consolidated Plan, the most recent Comprehensive Housing Affordability Data (CHAS), 2022 Point in Time Count reports (PIT Count) from Jan. 27, 2022, and August 2022, 2021, CoC Housing Inventory Count (HIC), supplemented by stakeholder surveys and input.

Homeless as defined in 24 CFR 91.5

The most significant unmet need of those experiencing both sheltered and unsheltered homelessness is a lack of available housing units within the allowable payment standards to move homeless persons into

affordable housing. Besides this, emergency shelters continue to be at capacity with a wait time of three to four weeks for move in during the past year. Many of those currently experiencing homelessness who have access to rental assistance through an emergency voucher or the local rapid rehousing program (known as HAND) still have difficulty finding a unit that is within the allowable payment standards. The same situation is happening with the Homeless Trust's \$11 million voucher program (TBRA) which receives federal funding. Given the shortage of affordable housing, the program is having difficulty finding landlords to participate and as of early May 2022, the program had 300 unused vouchers to be paid directly to the landlords. The last *Miami-Dade County Homeless Trust Gaps and Needs Assessment Report on Homelessness*⁴ is based on the 2022 PIT count data and on data gathered from 1,344 surveys returned by persons experiencing homelessness on their history and needs. The document indicated that the "CoC solicits additional feedback on gaps and needs through countywide budget meetings, CoC Board meetings . . . client satisfaction surveys and feedback received through a survey that is accessible through [their] website," and that the recurring theme continues to be a lack of affordable housing, "including extremely low income housing as well as permanent supportive housing for persons with special needs." The document further indicates that lack of healthcare, mental health care, and employment opportunities are also recurring themes.

Another unmet need is how to best assist the unsheltered, many of whom are shelter resistant. In September 2021, the City of Miami Commission passed Resolution 21-0372 detailing citywide clean-ups, three times a week, at "hot spot" locations known to have recurring homeless encampments that had become a public health concern. In the Summer of 2022, the City Commission adopted Resolution 22-0308, asking the City Manager to prepare a study to include the costs associated with other options including "tiny home" transitional housing (50 to 100) for the City's homeless population and to present costs/feasibility of these other options. While the "tiny homes" concept is on hold for further evaluation, this effort has spurred conversations with Miami-Dade County and Homeless Trust officials to consider the option of acquiring, retooling, and rehabbing existing properties for the shelter resistant individual. City leaders have indicated they want to work with Miami-Dade County to help make more shelter beds available, to identify alternative sites for temporary housing facilities and to stop releasing people from jail, with no place to go, within Miami city limits.

At Risk of Homelessness as defined in 24 CFR 91.5

The City and County continue to deal with a housing affordability crisis, with a significant unmet need for affordable housing and quick access to it, which makes the "at risk" household even more vulnerable. Of the City's 45,600 rental households with incomes at or below 30% AMI, more than half (28,405 households) are extremely cost burdened, spending over 50% of their income on rent. a significant portion The lack of sufficient income means most of these households cannot afford a rental hike. In their most recent *Countywide Evictions and Foreclosures Quarterly Report*⁵, the County's Office of the Commission Auditor reported that 4,962 eviction cases were *pending*, filed on or after March 1, 2020 through June 2022. The bulk of these cases are residential. When looking further into the eviction case load by zip code, the data in the report indicated that the third highest number of filed evictions of all County zip codes was 33132 which correlates to the downtown Miami area (189 cases). The report also indicated that from March 1, 2020 through June 30, 2022, there had been 10,220 writs of possession executed County-wide. It is difficult to know whether those households that were evicted turned to friends or family, relocated elsewhere, or turned to the shelter system or other program/services accessible via the CoC's Homeless Helpline. The report also noted an increase in eviction filings in Jan. through June of 2022, when comparing this year's numbers to those reported in 2021, on a month-to-month basis.

⁴ [2022-miami-dade-gaps-and-needs-report.pdf \(homelesstrust.org\)](https://www.homelesstrust.org/2022-miami-dade-gaps-and-needs-report.pdf)

⁵ [Eviction Reports \(miamidade.gov\)](https://www.miamidade.gov/eviction-reports), Second quarter (2022)

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

We referred to the *Gaps & Needs Report*⁶ issued in May 2020 by the Gaps and Needs Workgroup of the Miami-Dade County Domestic Violence Oversight Board to address this QP. The report indicates that the principal needs include: 1) a single, centralized, hotline and coordinated entry system to ensure maximum utilization of available resources and access to emergency shelter and supportive services for all DV victims in accordance with their needs; 2) and addressing the urgent shortage of emergency shelter beds for domestic violence victims, exacerbating the challenges for victims urgently in need of safety.

The *Gaps & Needs Report* also goes on to make the connection between victims of domestic violence and homelessness, indicating that because DV victims are often forced to flee their homes in search of safety, many leave behind their possessions with children in tow, leading to homelessness. The report indicates that “from 2013 to August 2019, more than 15,800 Miami-Dade residents who received homeless emergency shelter and other housing assistance reported fleeing domestic violence.” As per the report, victims in need of shelter are often turned away because of an urgent shortage of shelter beds in domestic violence centers and the lack of a coordinated entry system that efficiently utilizes the limited resource. As background, emergency shelters for domestic violence victims previously could only gain certification if approved by the Florida Coalition Against Domestic Violence (FCADV), which also controlled State funding for those centers, under the auspices of the Florida Department of Children and Families (DCF). The FCADV approval process created a barrier to certification of new domestic violence centers. The Florida State legislature and Governor adopted new legislation on February 27, 2020, removing the FCADV from its duties and functions and transferring the same to DCF, including in particular the licensing and funding of domestic violence centers.

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

Extremely low-income individuals and households making 30% or less of the area median income, are at great risk of housing instability or are living in unstable housing situations. A disproportionate number of these individuals are minorities, elderly, and unaccompanied youth.

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

Emergency shelters for the homeless, operated by the County, continue to be full to capacity. The average number of days homeless (for adults only) within the CoC sits at 183 days, with 47 percent of households in the homeless system exiting to permanent destinations. So sufficient shelter space is lacking, as is sufficient next step affordable housing to move the households into. The creation of additional emergency shelter and interim housing could potentially fill some of the gap to strengthen the response system.

The Trust (CoC) has also identified a need to serve elderly homeless persons, given escalating rents and fairly stable social security assistance amounts. To that end, a portion of the County’s HOME-ARP funding will be used to acquire a facility in the northern part of the County (outside of City limits) for homeless seniors recovering from COVID-19.

Besides this, in just four months of 2022, Camillus House indicated that 254 families had called the homeless prevention hotline seeking homeless prevention services, a record number of calls. In the most

⁶ [Domestic-Violence-Gaps-and-Needs-Report-5.9.20-Final.pdf \(lotushouse.org\)](#)

recent *Miami-Dade County Homeless Trust Gaps and Needs Assessment Report on Homelessness* where by 1,344 surveys were gathered from persons experiencing homelessness in regard to their history and needs, an overwhelming majority of those surveyed (75%) identified being in need of the following service: “*Housing Placement.*” The same Report also mentions that a recurring theme in CoC discussions on gaps and needs includes the “lack of affordable housing, ELI Housing, as well as supportive housing for persons with special needs.”

There is a gap in housing inventory for the disabled. Based on the 2016-2020 ACS 5-Year Estimate for the City of Miami, 11.7% of persons have a disability, with the bulk of that percentage being persons age 65 and over. The County’s Commission on Disability Issues identified a need for more housing for persons with disabilities. There is also a need for more housing and services for victims of human trafficking and domestic violence.

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:

The City of Miami’s last Consolidated Plan (2019-2023), noted that a lack of sufficient income was the number one factor contributing to homelessness. Those surveyed at the time the CP was filed indicated that finding true affordable housing, and securing rental assistance were the greatest needs. Miami-Dade County’s low wages, high housing costs and increasingly limited affordable housing options, is creating substantial housing instability among its residents. In addition, disability, including mental health, substance abuse disorder, chronic health condition and/or physical disability have an adverse impact on housing stability.

Identify priority needs for qualifying populations:

Based on analysis of the data sources mentioned and consultation, the standout “need” across all of the QPs is quick *access to affordable housing*. People experiencing housing crisis or fleeing an unsafe situation need to find a place to stay quickly. Given the escalating rents in the City of Miami where close to 70% of housing units are rentals, locating an affordable unit has become more and more difficult, creating a major gap that can potentially lead to homelessness. In Florida’s private market, landlords can set their rents as they see fit and with reports indicating that some landlords have hiked up rents by up to 100% this year, this drastic increase is simply unattainable for low income households already grappling with inflation costs. The priority needs for the qualifying populations include the development of permanent affordable rental housing (inclusive of new construction and/or rehabilitation), and the need for supportive services which the City is addressing via other funding sources referenced elsewhere. The development of affordable rental units with affordability terms, will allow more individuals to transition out of temporary housing and into permanent housing that takes their household income into consideration.

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 level of need and gaps was identified using a combination methodology. HCD referred to the Miami-Dade CoC’s most recent 2022 Point-in-Time Count data, the most recent CHAS data, and the most recent Housing Inventory County (2021) filed with US HUD, while also incorporating discussion with, and

survey feedback from, current providers and stakeholders who work with the QPs. The City also referred to its Consolidated Plan 2019-2023.

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:

Due to the specific requirements of HOME-ARP funds implementation, upon the City’s receipt of the funds, HCD will advertise and issue a new Request For Proposals (RFP) specific to these funds, and review and score the submissions received. The bid, or bids, with the highest score(s) will be taken before the City of Miami Commission for their consideration and final decision.

Describe whether the PJ will administer eligible activities directly:

DHCD will not administer eligible activities directly. However, the Department will underwrite and monitor all HOME-ARP activities for compliance with federal regulations.

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:

No portion of the HOME-ARP administrative funds have been provided to a sub-recipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation Plan.

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	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 10,812,362.95		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%

Administration and Planning	\$ 1,908,064.05	15 %	15%
Total HOME ARP Allocation	\$ 12,720,427		

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

The total HOME-ARP allocation is \$12,720,427 of which 15% is being set aside by DHCD for planning and administration costs. Up to \$10,812,362.95 in HOME-ARP funds are being recommended for the development of affordable rental housing for the four qualifying populations as identified in the HOME-ARP regulation via a future advertised Request For Proposals (RFPs), with submissions that would then be reviewed and scored based on specific criteria. Those proposals scoring the highest would then be recommended to the City of Miami Commission for their final decision on projects ready to proceed. The HOME-ARP funds will be used to address the four qualifying populations.

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:

After consultation with the different service providers, the need for more affordable housing open to all four qualifying populations was the prevailing ask. The gap analysis further reinforced the need for more affordable housing for vulnerable populations. The feedback provided by the Continuum of Care and the other service providers was instrumental to putting together the Allocation Plan. Due to the escalating rental costs seen in the private market in the City and County, and with few existent legal options to regulate those private rents, there is more need than ever for viable housing for those on the lower ends of the income spectrum.

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 estimates that 100 affordable rental housing units for the Qualifying Populations can be produced via the HOME-ARP funding allocation. The numbers provided here are a projection and will be subject to change based on construction/rental costs at the time of development. The City’s Department of Housing & Community Development will endeavor to partner with entities that are able to leverage other resources to meet or exceed the minimum goal established.

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 Miami’s affordable rental housing production goal via the use of HOME-ARP funding is 100 units. This production goal will address the high priority need identified in the City’s last Consolidated Plan 2019-2023, of increasing the affordable housing supply to address the mismatch of household incomes (low) and housing costs (high) in the City. These units will be open to all qualifying populations thereby increasing the availability and accessibility of affordable housing. This is especially important

given the loss of many of its historically affordable multi-unit housing structures which have been sold and/or replaced by newer housing structures with higher rental costs.

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 intends to support HOME-ARP activities that provide housing to all qualifying populations as defined in HUD's CPD Notice 21-10 (§ IV.A. Qualifying Populations), including people who are homeless; those at-risk of homelessness; those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; individuals for whom provision of supportive services would prevent homelessness or who are at the greatest risk of housing instability; and veterans and their families that meet any of the listed criteria. The City will not give a preference to any one of these qualifying populations and will not further identify any sub-populations within the qualifying populations already delineated.

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:

See above.

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):

Enter narrative response here.

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):

Enter narrative response here.

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):

Enter narrative response here.

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):

Enter narrative response here.

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 Miami does not intend to limit eligibility for HOME-ARP rental housing to a particular qualifying population, or a subpopulation of a qualifying population.

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:

Does not apply.

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):

Does not apply.

DRAFT

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.
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***
Not applicable.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
Not applicable.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
Not applicable.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
Not applicable.
- ***Other requirements in the PJ's guidelines, if applicable:***
Not applicable.