

# PUERTO RICO HOME INVESTMENT PARTNERSHIPS AMERICAN RESCUE PLAN PROGRAM (HOME-ARP)

**DRAFT FOR PUBLIC COMMENTS**



# Contents

Background.....	4
Consultation.....	4
Describe the consultation process including methods used and dates of consultation: .....	4
Summarize feedback received and results of upfront consultation with these entities:.....	9
Public Participation.....	10
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:.....	11
Describe the public participation process: .....	11
Describe efforts to broaden public participation:.....	11
Needs Assessment and Gaps Analysis.....	14
Describe the size and demographic composition of qualifying populations within the PJ’s boundaries: .....	15
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): .....	22
Describe the unmet housing and service needs of qualifying populations: .....	24
Homeless as defined in 24 CFR 91.5 Enter narrative response here. ....	24
Identify any gaps within the current shelter and housing inventory as well as the service delivery system: .....	24
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:.....	25
HOME-ARP Activities .....	26
Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:.....	26
Describe whether the PJ will administer eligible activities directly:.....	26
Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis: .....	26
HOME-ARP Production Housing Goals .....	27
Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:.....	27
Preferences.....	27
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:.....	27
Referral Methods .....	27

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):..... 27

Limitations in a HOME-ARP rental housing or NCS project..... 28

HOME-ARP Refinancing Guidelines..... 28

## **HOME-ARP Allocation Plan Participating Jurisdiction: Puerto Rico**

### **Background**

Section 3205 of the American Rescue Plan (ARP) Act, made available \$5 billion to be distributed among eligible jurisdictions to assist homeless individuals or families at risk of homelessness and other vulnerable populations through the provision of housing, rental assistance, supportive services, and non-congregate shelters. This is intended to reduce homelessness and increase housing stability nationwide.

These funds will be administered through the HOME Investment Partnerships American Rescue Plan Program (HOME-ARP) of the U.S. Department of Housing and Urban Development (HUD). In the case of Puerto Rico, the Puerto Rico Housing Finance Authority (PRHFA) was designated as a Participating Jurisdiction ("PJ") to administer and implement the program's state allocation of \$49,584,423.

For the purposes of determining the use that will be given to the funds, the jurisdictions that receive funds, such as the PRHFA, must submit a Plan to HUD, where the needs are identified and the type of activities that will be subsidized to meet them are established. The Plan must be based on a process of consultation and citizen participation.

This document provides Puerto Rico's Allocation Plan for the distribution of HOME-ARP Funds.

### **Consultation**

*Describe the consultation process including methods used and dates of 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.

In order to comply with these requirements and ensure that as much input as possible was obtained for the development of the plan, the Puerto Rico Housing Financing Authority (PRHFA) used a combined strategy to consult stakeholders. The methods used included a series of focus groups or face-to-face consultations, written consultations, and a web survey.

Concerning to the face-to-face methods, the Puerto Rico Housing Financing Authority (PRHFA) organized two consultation sessions with stakeholders to discuss the best use of HOME-ARP funds. The consultation sessions were on November 20, 2022, at 9 a.m. and another at 2 p.m. A

total of 25 stakeholders representing a broad array of sectors participated in the focus groups. The sessions were organized in two parts: a preparatory presentation and the discussion with participants. During the preparatory part, a presentation was provided with information on the HOME-ARP funds, eligible uses, qualifying populations, available funds, other aspects related to the HOME-ARP program and a general context of homelessness in Puerto Rico (See Appendix). The participants were then organized into smaller groups for an in-depth discussion of the needs of the homeless population and gaps in the housing and service delivery systems, activities that are currently occurring in the jurisdiction, recommendations for the distribution of funds in terms of eligible activities and geography and opportunities for collaboration. The discussion in the focus groups was conducted using a semi-structured guide of questions.

In order to obtain information on groups that were invited to the consultation but were unable to participate, written and telephone contacts were made, and an electronic survey was sent out, which sought to gather information on the same issues. This was implemented during February and March 2023. A total of seven groups of stakeholders were represented among the participants of this method of consultation.

***List the organizations consulted:***

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Casa Julia</b>	Domestic violence service providers	Face-to-face consultation session	Provided input concerning the needs of the homeless population and gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities, and opportunities for collaboration
<b>Puerto Rico Department of Family / COC-502</b>	Collaborative Applicant of the CoC PR 502 / public agency that manages the state disability program	Face-to-face consultation session	Provided information on the most recent Point in Time Survey and Housing Inventory Count and information on the needs of the homeless population and gaps in the housing and service delivery systems.
<b>Puerto Rico Department of Family / ESG &amp; ESG CV Program</b>	State Recipient for ESG and ESG-CV funds	Face-to-face consultation session	Provided input concerning the needs of the homeless population and gaps in the housing and service delivery systems, as well as information on ESG projects, including the use of ESG-CV funds for non-congregate shelters.
<b>Guara Bi Inc.</b>	Homeless service providers	Face-to-face consultation session	Provided input concerning the needs of the homeless population, in particular the elderly population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Hogar Buen Pastor</b>	Homeless service providers	Face-to-face consultation session	Provided input concerning the needs of the homeless population, in particular populations with substance abuse problems, gaps in the housing and service delivery systems, and recommendations on the eligible uses.
<b>Puerto Rico Health Department / RWPB Program</b>	Public agencies that address the needs of the qualifying populations / public agency that administers the HOPWA State Allocation and the RWPB Program	Face-to-face consultation session	Provided input concerning the homeless population's needs and gaps in the housing and service delivery systems.
<b>Iniciativa Comunitaria</b>	Homeless service providers	Face-to-face consultation session	Provided input concerning the needs of the homeless population, in particular of the population with a substance abuse problem, gaps in the housing and service delivery systems, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>Municipality of Toa Baja</b>	PHA	Face-to-face consultation session / Web Survey	Provided input concerning the needs of the homeless population, gaps in the housing and service delivery systems, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>Municipality of Moca</b>	Homeless service providers	Face-to-face consultation session	Provided input concerning the needs of the homeless population, gaps in the housing and service delivery systems, recommendations for the distribution of funds in terms of eligible activities, and opportunities for collaboration
<b>Municipality of Orocovis</b>	Homeless service providers	Face-to-face consultation session	Provided input concerning the needs of the homeless population, gaps in the housing and service delivery systems, recommendations for the distribution of funds in terms of eligible activities, and opportunities for collaboration
<b>Coordinadora Moriví / COC-503</b>	Collaborative Applicant of the COC PR 503	Face-to-face consultation session	Provided the results of the most recent Point in Time Survey and Housing Inventory Count, as well as input concerning the needs of the homeless population, gaps in the housing and service delivery systems, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>Hogar Nueva Mujer</b>	Domestic violence service providers	Face-to-face consultation session	Provided input concerning the needs of the homeless population and gaps in the housing and service delivery systems, needs of the population that is fleeing

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			domestic violence, recommendations for the distribution of funds in terms of eligible activities, and opportunities for collaboration
<b>Coalición de San Juan</b>	Administrator of the HMIS for the CoC PR 502 / and homeless service provider (outreach and prevention services)	Face-to-face consultation session	Provided input concerning the needs of the homeless population, in particular the elderly population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>IPVI de Puerto Rico</b>	Homeless service providers	Face-to-face consultation session	Provided input concerning the needs of the homeless population, in particular the youth population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>Coordinadora Paz para la Mujer</b>	Domestic violence service providers	Face-to-face consultation session	Provided input concerning the needs of the homeless population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities, and opportunities for collaboration
<b>CDETA PR</b>	Homeless service providers	Face-to-face consultation session	Provided input concerning the needs of the homeless population, in particular the elderly population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>INDESOVI de PR</b>	Community based housing development organization	Face-to-face consultation session	Provided input concerning the needs of the homeless population, in particular the elderly population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>Coalición de Coaliciones</b>	Services provider / administrator a CES and HMIS	Face-to-face consultation session	Provided input concerning the needs of the homeless population, in particular the elderly population, gaps in the housing and service delivery systems, needs of the

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>Estancia Serena Inc.</b>	Homeless service providers	Face-to-face consultation session	Provided input concerning the needs of the homeless population, in particular the elderly population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>Puerto Rico Housing Department</b>	Public agency in charge of housing policy on Puerto Rico	Face-to-face consultation session	Provided input concerning the needs of the homeless population, in particular the elderly population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>Municipality of Carolina</b>	Participating Jurisdiction	Web Survey	Provided input concerning the needs of the homeless population, in particular the elderly population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>Municipality of Caguas</b>	Participating Jurisdiction	Web Survey	Provided input concerning the needs of the homeless population, in particular the elderly population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>Civil Rights Commission</b>	Nonprofit organization that addresses fair housing, civil rights, and the needs of persons with disabilities.	Web Survey	Provided input concerning the needs of the homeless population, in particular the elderly population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>Municipio de Mayaguez</b>	Participating Jurisdiction	Web Survey	Provided input concerning the needs of the homeless population, in particular the



Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
			elderly population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration
<b>Public Housing Administration</b>	PHA/ Administrators HUD-VASH Program and EHCV	Web Survey	Provided input concerning the needs of the homeless population, in particular the elderly population, gaps in the housing and service delivery systems, needs of the population that is fleeing domestic violence, recommendations for the distribution of funds in terms of eligible activities and opportunities for collaboration

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

According to the stakeholders that participated in the focus group sessions, although the Point in Time Surveys have shown a decrease in the number of homeless persons throughout the years, the population has increased by subpopulations and geographical areas. Similarly, the participants highlighted changes in the nature of the needs and characteristics of the homeless population. When evaluating the priority populations identified by the interest groups, older adults, people with mental health problems, including problematic substance use, people who are homeless for the first time, youth, the LGBTTTQI+ community, and women fleeing violence were mentioned among priority populations by the different interest groups.

With respect to the type of projects that are needed to address the needs of QPs, participants identified permanent housing with supportive services, single-family or multi-family rental housing, and non-congregate emergency shelters as the ones they consider necessary and where they understand the offer is deficient or very deficient. On the other hand, among the support services considered necessary, they identified intensive health care (for example, conditions in the elderly population), mental health services, rehabilitation from problematic substance use, services for people with a positive diagnosis of HIV, case management, housing navigation and the deposit requirement of utilities.

Focus group participants also emphasized the lack of housing inventory that limits people's ability to quickly move into permanent housing. There are projects that have available vouchers from RRH and other programs, but they are unable to place participants due to this lack of units. In addition, they pointed to other problems related to the local context in Puerto Rico that also affect the inventory available to the homeless population. In particular, they noted how, on top of the shortage of affordable housing, they have to compete for units with Airbnb. They mentioned that many landlords prefer to use their homes for this service and that the rents that can be paid in programs targeting the homeless population are not financially attractive to them. They also

mentioned that there continue to be attitudinal and stigma barriers associated with the population that also limit them in their search for housing options.

Groups consulted through the Web had the opportunity to express their opinion based on their experience with the needs and realities faced by people who are homeless or at risk of losing their homes in Puerto Rico. For these purposes, most of the people who responded to the survey understand that the current situation of the homeless in Puerto Rico is worse than in the past three years. Similarly, employees identified an increase in the number of homeless individuals in the municipalities where they offer services during the past three years. The lack of affordable housing availability is primarily mentioned when probing for the factors behind the increase in homelessness identified by participants. In addition, economic problems (including unemployment), health situations (including the pandemic), and inflation (including increased food and energy costs, among others) were other factors mentioned.

The groups mentioned as those that are most at risk of losing their homes, participants mentioned survivors of gender violence, the population group with problematic substance use, and the elderly stood out. Also, people with disabilities and families with children were identified. In turn, people who are homeless or at risk of losing their homes face many needs, among them is the need for safe housing and access to other support services. In the same way, different primary needs, such as economic and nutritional needs, were identified.

According to the participant's experience, permanent housing projects with supportive services are the type of primary housing projects that should be established to serve the needs of those who are homeless or at risk of homelessness. Additionally, non-congregate shelter projects and single-family and multi-family rental housing were the other three projects identified as necessary to address the needs of this population. Regarding support services, mental health services, substance abuse treatment, case management, and rental assistance stand out among the support services necessary to meet the needs of people without a home or at risk of losing it. The other support services highlighted were orientation and housing search, legal services, life skills training, outreach services, and assistance with costs such as utilities, deposits to rent a house, and moving expenses.

Participants also recommended including supportive services as HOME-ARP eligible activities within the action plan, in particular mental health services should be provided, and in particular for the problematic use of controlled substances. In addition, they understood it is important to provide independent living skills services, services to acquire skills for job placement, services directed at the use and abuse of substances, provide funds to pay the staff of the organizations to increase the specialized human resources to attend to this population, educational services aimed at preventing loss of housing and orientation of available services were also considered necessary. The results of this survey are included in more detail in the Appendix.

## **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**. In addition, PJs must

hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

***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:***

***Public Hearing***

- ***Date(s) of public notice: 1/10/2023***
- ***Public comment period: start date - 1/27/2023 end date - 2/27/2023***
- ***Date(s) of public hearing: 1/26/2023***

***Publication of the Plan:***

- ***Date(s) of public notice: 3/13/2023***
- ***Public comment period: start date – 3/14/2023 end date - 3/28/2023***

***Describe the public participation process:***

In accordance with Title 24 Code of Federal Rules, Part 91-115, and the State Participation Plan for the HOME Program, the PRHFA conducted a public hearing on January 26, 2023. A total of 57 stakeholders attended the hearing. The notice of the public hearing was published in a newspaper of general circulation on January 10, 2023, in English and Spanish. The public hearing was held in the facilities of the PRHFA and retransmitted via social media. During the hearing, participants had the opportunity to comment. Also, after the Hearing, the PRHFA provided 30 days for additional comments until February 27, 2023. A total of six participants provided comments during the hearing, and five comments were received during the comment period. (See Appendix for the evidence of public notice and attendance list).

Sign language translation was available during the hearing, and an opportunity was provided for English speakers to request an English translation of the hearing. Also, after the hearing, a copy of the presentation was shared in an easy-to-read format for people with disabilities.

The PRHFA published the availability of the draft of the allocation plan on March 13, 2023, in English and Spanish. The notice was published in a newspaper of general circulation in English and Spanish and 15 days were provided (until March 28, 2023) for comments. The draft of the plan was also available in English and Spanish. A total of [REDACTED] comments were received.

***Describe efforts to broaden public participation:***

To ensure greater public participation that would better reflect the concerns, needs, and priorities of homeless individuals or families, those at risk of becoming homeless, and other vulnerable populations the PRHFA developed a database of stakeholders at the beginning of the planning process to achieve direct contact and engage entities in the consultation process. Stakeholders received written communications from the PRHFA and email reminders of the different consultation and public participation events. A telephone line was available to provide additional information or answer questions. Information was also shared with the CoC for its dissemination. Staff from the HOME program participated in meetings and activities with stakeholders where information about HOME-ARP was shared, including the first symposium of the homeless population celebrated by the CoC PR 502 and that had the participation of more than 150

stakeholders. The PRHFA participated in a panel where the program and the opportunities to comment were discussed.

Public notices for public participation activities were published in a general circulation newspaper in English and Spanish. Information was available in an easy-to-read format for persons with disabilities. Consultations and public hearings were held in accessible locations free of barriers for persons with disabilities and translation of language for the hearing impaired was provided. Information was available through the Web, via email, and through social media. Citizens had 30 days of opportunity to comment on the hearing and 15 days for the publication of the draft.

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

A total of 11 comments were received during the public hearing and the publication of the draft. Among the comments and recommendations issued at the public hearing, the need to consider people over 60 years of age, regardless of whether or not they need support services, was highlighted. Youth was another of the populations identified as a priority, although they do not reflect a high proportion in the CoC PIT counts. Several of the participants pointed out the importance of being creative when using these funds and considering municipalities when distributing the funds to eligible activities. In particular, municipalities were recommended to propose projects directed at the transformation of public nuisances in their municipalities and convert them into affordable housing for rent.

The stakeholders also expressed that there is a need for support for persons who have disabling conditions, including mental health conditions, although they are not necessarily chronic homeless. As pointed out by participants, this subpopulation requires supportive services and assistance to be able to maintain a house and a job were highlighted. However, some projects are focused or give priority to the chronic homeless population, and this limits the ability of this subpopulation to access permanent housing for those not chronically homeless.

During the hearing, participants also highlighted the importance of considering in the analysis the need for an inventory of beds as there are people who have vouchers, but there are no units where they can be placed.

As mentioned, after the hearing stakeholders also had the opportunity to submit their comments in writing. Five written submissions were received. Municipalities that commented stressed out the importance of considering municipalities as potential subrecipients for HOME-ARP funds and to consider activities that take into account the differences by regions, as well as ways in which units that are abandoned or not in use can be transform into affordable rental units.

In terms of the elderly population, some of the participants understand that this population is increasing. For this reason, they recommend that both the government and private entities must be prepared to offer more and better services according to the needs of the elderly. In addition, they know it is necessary to respond with agility, dynamism, and greater efficiency to the circumstances presented to this population to satisfy their needs, especially in housing and health.

Concerning the population affected by intrafamily violence, the municipalities explained that the victims are forced to resort to Protection Homes managed by non-profit institutions and to take refuge in protection shelters for victims and witnesses operated by the Department of Justice.

Regarding the structures in disuse or considered a public nuisance, they report that they have unoccupied structures basically abandoned by their registered owners. For these purposes, they recommend that under the provisions of Law 107-2020, those structures be identified that, due to their condition of Public Nuisance, can be recovered and inventoried within the needs of providing housing to the most pressing sectors.

Another stakeholder expressed that they have identified an increase in people at risk of losing their homes due to delays in utilities and others living in the property without utility services due to not having financial resources to cover said expense. For this reason, they recommend the payment of arrears of utilities within the proposal, bearing in mind that, for the approval of the service, the applicant is not penalized for being bedridden or not being in his right mind for decision-making, depriving the family member or caregiver of requesting services on their behalf without an order from a judge or court to do so. In turn, they identified the need to have spaces or assisted housing for participants between the ages of 24 and 55 with physical and mental disabilities who do not have family support for their care or people over 55 with disabilities who do not have a home fit to live. They also point out that there is a need to house women who have not been victims of domestic violence and 18-year-olds without families who leave care homes of the Department of the Family and who do not have a suitable place to live once they turn 18 years old.

They understand that daycare for the elderly should be included among the eligible support service activities, in addition to childcare, since they do not have spaces for their daycare at no cost to the relatives who care for them. The stakeholders also expressed that a single mother or father needs a place to leave their children to care for her while she works and children who need to leave one of their parents for free daycare while they go to their place of employment. On the other hand, they propose that these funds be used to develop homes for the elderly since a high percentage of the population is aged in Puerto Rico. They add that these elderly adults are often rapidly losing their mental faculties and are retained in the emergency shelters because there are no homes where they can be placed since they are very expensive and their children find it impossible to care for them or simply do not want to deal with the problem.

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

Of the comments provided during the citizen participation processes, the only ones not accepted were those aimed at recommending funds for non-congregate emergency shelters. After an analysis of the available information and taking into consideration that the state has recently received allocations for this purpose (ESG-CV), it was understood that the problem of the lack of inventory for permanent housing should be addressed as a priority.

## Needs Assessment and Gaps Analysis

**Table 1 - Homeless Needs Inventory and Gap Analysis Summary Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Fam ily HH (at least 1 child)	Adul t HH (w/o child )	Vets	Victi ms of DV	Family		Adults Only	
	# of Beds	# of Unit s	# of Beds	# of Unit s	# of Beds					# of Beds	# of Unit s	# of Beds	# of Unit s
Emergency Shelter	95	20	303	#	0								
Transitional Housing	110	33	248	#	13								
Permanent Supportive Housing	427	145	1,459	#	214								
Other Permanent Housing	0	0	255	#	0								
Sheltered Homeless						141	346	13	84				
Unsheltered Homeless						56	1,672	68	65				
<b>Current Gap</b>										197	65	2,018	1,800
Adjustment (level of available beds in current inventory)										43		146	
Current Gap adjusted										154	51	1,872	1,685

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

**Table 2: Housing Needs Inventory and Gap Analysis Summary Table**

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	# of Units	# of Households	# of Households
Total Rental Units	380,030		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	129,790		
Rental Units Affordable to HH at 50% AMI (Other Populations)	53,115		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		47,165	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		24,465	
<b>Current Gaps</b>			71,360

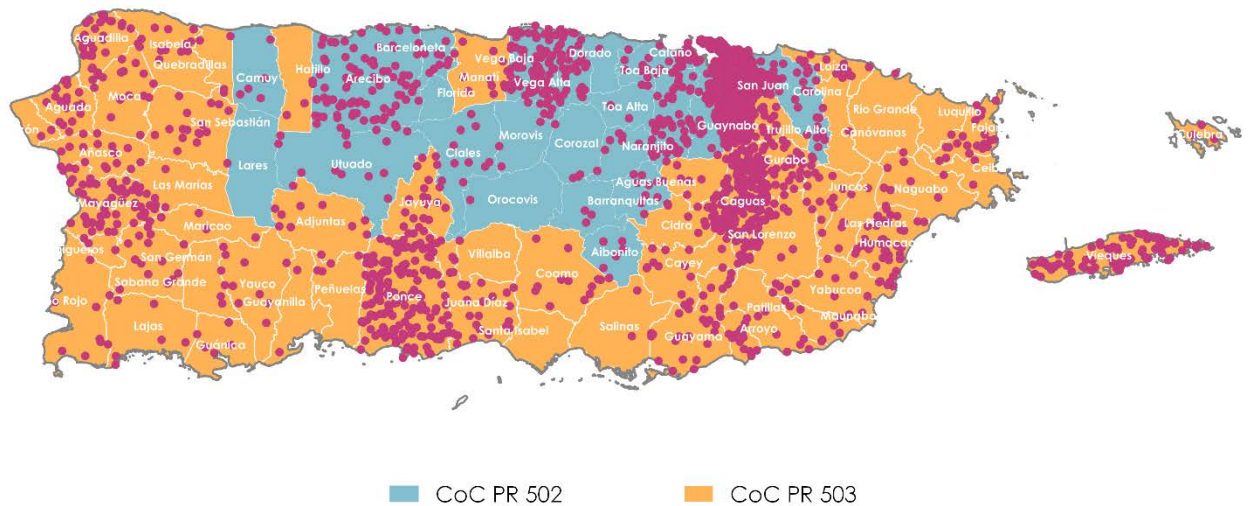
**Sources:** 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

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

***Homeless as defined in 24 CFR 91.5***

According to the most recent Point in Time Survey (2022), the estimate of sheltered (ES, SH, TH) and unsheltered persons is 2,215 in Puerto Rico. It should be noted that, within this group, 7.6% are homeless with families. Similarly, 2,556 persons were in permanent housing projects during the night the count was made.

## Homeless persons identified by municipalities in the PIT Survey Count 2022



Regarding the characteristics of this population, 87.8% are over 25 years of age, while the average age identified was 44 years in sheltered persons and 49 years in the non-sheltered. Similarly, seven out of ten homeless persons (75.8%) belong to the male gender, while 22.2% identified themselves as female. In addition, 43.9% of the homeless identified as White, 30.6% as Multiracial, and 21.5% as Black or African American. Notably, the proportion of multiracial people is 20.9% higher among homeless people compared to the general population of Puerto Rico and 10.2% higher among black or African American people.

In geographic terms, a higher proportion of homeless persons was observed in the metropolitan area, the west of the Island, and the cities of Vieques, Caguas, Arecibo, Vega Alta, Vega Baja, and Ponce. When evaluating the change in the number of homeless people identified by the municipality, Vieques registered the most significant increase with 75 additional persons counted, followed by the cities of Caguas (+53), Ponce (+39), Juana Díaz (+22), Gurabo (+17), San Sebastián (+13) and Arroyo (+11). Among the municipalities that did not register any change were Comerio, Dorado, Florida, Orocovis, Fajardo, Peñuelas, and Yabucoa. Finally, among the cities with a decrease, San Juan (-160), Mayagüez (-63), Humacao (-54), Loiza (-38), and Aguadilla (-35) were identified.

Notably, most homeless persons (78%) are unsheltered (1,728), a proportion that has been increasing during the past years, from 64.3% in 2011 to 78% in 2022. Among the unsheltered population, the two main places where the unsheltered spend the night are abandoned houses or buildings (29.1%) and the streets or sidewalks (24.1%).

One out of every ten homeless people counted in 2022 (12.4%) 18 years old or older are chronically homeless. A chronically homeless person is defined as a person who has a disabling condition and has been continuously homeless for one year or more or has had four (4) or more episodes of homelessness in the last three (3) years and whom the sum of these episodes results in at least 12 months. Among the reasons for being homeless, 46.5% attributed it to the use of drugs and alcohol, 24.9% to family problems, and 18.8% to financial or economic issues. It should be noted that only 3.2% attributed the situation of homelessness to COVID-19.



Similarly, just over half of the participants (51%) are experiencing homelessness for the first time, while 50.2% of those are not sheltered. On the other hand, 72.3% of those interviewed as part of the PIT Count expressed that they present a situation of vulnerability, and in 60% of the cases, this situation of vulnerability prevents them from maintaining a home or job, 52% expressed that they consume alcohol or drugs, 32.4% have mental or emotional health conditions, and 17.5% have some disability or physical impediment.

Similarly, a total of 135 homeless persons counted (6.3%) were identified with a positive diagnosis of HIV; 98.9% are older than 25, 68.1% identify with the male gender, and 50.2% are homeless.

***At Risk of Homelessness as defined in 24 CFR 91.5***

Persons at risk of homelessness are individuals or families with a median family income below 30%, who lacks of resources or support, and have experienced housing instability as defined in 24 CFR 91.5.

According to the most recent Comprehensive Housing Affordability Strategy data (CHAS 2015-2019), out of a total of 1,192,655 households in Puerto Rico, 45.3% or 540,300 are considered low- and moderate-income households for having an income below 80% of the HUD adjusted Median Family Income (HAMFI). A total of 219,305 is 0-30% HAMFI, representing close to one fifth of the total households (18.4%). This proportion however is higher when considering certain types of households, as is the case of households with one or more children 6 years old or younger (27.4%).

Among households with one or more children 6 years old or younger income disparities are much more pronounced. Although 51.7% are low- and moderate-income households, among the group as much as 37.5% have very low income (less than 50% HAMFI), 27.5% of which is extremely low income.

**Number of Households by Income, 2019**

	0-30% HAMFI	>30- 50% HAMFI	>50- 80% HAMFI	>80- 100% HAMFI	>100% HAMFI	Total
Total Households	219,305	129,405	191,590	102,460	549,890	1,192,655
Small Family Households	156,610	86,230	136,910	82,590	580,290	1,042,630
Large Family Households	15,500	11,690	18,135	10,285	68,985	124,595
Household contains at least one person age 62 or older (elderly famsily)	32,790	40,050	80,035	48,100	209,630	410,605
Households with one or more children 6 years old or younger	37,535	13,785	19,400	10,155	55,840	136,715

	0-30% HAMFI	>30- 50% HAMFI	>50- 80% HAMFI	>80- 100% HAMFI	>100% HAMFI	Total
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Source: Chas, 2015-2019 5-year estimates.

Housing tenure in Puerto Rico is relatively high. The homeownership rate for Puerto Rico was estimated at close to 70% in the CHAS 2015-2019 5-year estimates. Nevertheless, homeownership rates are much lower among  $\leq 30\%$  HAMFI households, which account for 59% of renters, in contrast to 41% among homeowners. Precisely, when compared to other income groups, the lowest homeownership rate is among households with incomes below 30% HAMFI. The homeownership rate was reported at 59% in the income strata of more than 30% to less than 50% HAMFI. Among the income strata of more than 50% to less than 80% HAMFI, the homeownership rate increases to 66%. In the income strata of incomes above 80% homeownership rates were much higher: 70% among the 80% to less than 100% HAMFI strata and 81% in the 100% HAMFI and above strata.

**Table 1: Income by tenure, 2019**

Income by tenure	Renters only	% renters	Owners only	% owners	Total
Household Income $\leq 30\%$ HAMFI	129,790	59%	89,515	41%	219,305
Household Income $>30\%$ to $\leq 50\%$ HAMFI	53,115	41%	76,290	59%	129,405
Household Income $>50\%$ to $\leq 80\%$ HAMFI	64,875	34%	126,715	66%	191,590
Household Income $>80\%$ to $\leq 100\%$ HAMFI	30,270	30%	72,190	70%	102,460
Household Income $>100\%$ HAMFI	101,980	19%	447,910	81%	549,890
Total	380,030	32%	812,625	68%	1,192,655

Source: Chas, 2015-2019 5-year estimates

The presence of housing problems, as it is discussed in more detail in a next section, is more present in renters households,  $\leq 30\%$  HAMFI. As well of households with a cost burden  $> 30\%$  of income, 48.9% are small related renter households with severely low incomes, while 39.7% of small related owner households have severely low incomes. A total of 40,780 of elderly households, renter and owned units combined, with a cost burden  $>30\%$  have very low incomes.

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

According to the 2022 Point in Time Survey, approximately 204 individuals (9.5% of the total population counted) were homeless because they were going through a situation of gender violence, domestic or partner violence, sexual assault, stalking, or dating violence. Among this group, 88.7% are over 25, 62.3% are women, and 46.1% are unsheltered homeless. These data reflect a much larger problem in Puerto Rico. The Office of the Ombudsman for Women in Puerto Rico reported a total of 5,192 incidents of gender violence in 2022, and 2,786 domestic violence incidents, according to the Puerto Rico Police Bureau. Among the data on murders due to gender violence, 15 of the 20 cases in 2022 correspond to women. These data show an increase of five female deaths (15) in 2022 compared to 2019 (10). Similarly, these cases have also registered a continuous growth since 2019, when 11 cases were reported compared to the 20 reported in 2022. When evaluating the data related to sexual crimes for the year 2022, a total of 741 cases were registered. Within this group, 494 were lewd acts, and 101 corresponded to rapes, while Puerto Rico Police Department identified the highest incidence of sexual crimes in the Bayamon and San Juan regions.

***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***

Among the different populations that require services or assistance for home assistance are veterans and people with a positive diagnosis of HIV.

According to the 2022 PIT Count Survey, 3.2% of homeless persons counted have served actively in the United States Armed Forces, 1.7% have been activated or have been on active duty as a member of the National Guard or as a reservist, and 2.6% have received health care or services from a Veterans Center. Taking into consideration these characteristics the PIT estimated a total of 78 homeless veterans in 2022. Of those, 83.3% are unsheltered.

Regarding the condition of the household, a total of 39,510 are households with a cost burden > 30% of income. Of these, 59.5% are small related renter households with severely low incomes.

The households with severe cost burdens (housing costs >50% of income) add up to 34,805, 60.0% of them are small-related renter households with severely low incomes and 36.0% are small related owned households with severely low income.

**Cost Burden > 30%, 2019**

	Renter				Owner				All types
	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	Total	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	Total	Total
<b>Number of households</b>									
Small related	23,525	11,075	13,515	48,115	14,325	7,850	13,915	36,090	84,205
Large related	1,925	1,325	1,230	4,480	1,890	1,315	1,950	5,155	9,635
Elderly	6,445	5,010	6,460	17,915	18,140	11,190	14,280	43,610	61,525
Other	7,615	4,770	6,100	18,485	6,915	2,730	4,560	14,205	32,690
Total need by income	39,510	22,180	27,305	88,995	41,270	23,085	34,705	99,060	188,055
<b>Percent of total households, all types</b>									
Small related	27.9%	13.2%	16.1%	57.1%	17.0%	9.3%	16.5%	42.9%	100.0%
Large related	20.0%	13.8%	12.8%	46.5%	19.6%	13.6%	20.2%	53.5%	100.0%
Elderly	10.5%	8.1%	10.5%	29.1%	29.5%	18.2%	23.2%	70.9%	100.0%
Other	23.3%	14.6%	18.7%	56.5%	21.2%	8.4%	13.9%	43.5%	100.0%
Total need by income	21.0%	11.8%	14.5%	47.3%	21.9%	12.3%	18.5%	52.7%	100.0%

Source: Chas, 2015-2019 5-year estimates.

**Cost Burden > 50%, 2019**

	Renter				Owner				All types
	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	Total	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	Total	Total
<b>Number of households</b>									
Small related	20,885	7,610	4,215	32,710	10,830	5,030	7,680	23,540	56,250
Large related	1,700	800	365	2,865	1,455	830	875	3,160	6,025
Elderly	5,365	2,815	2,025	10,205	12,240	6,140	8,395	26,775	36,980
Other	6,855	3,640	2,035	12,530	5,475	1,965	3,135	10,575	23,105

	Renter				Owner				All types
	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	Total	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	Total	Total
Total need by income	34,805	14,865	8,640	58,310	30,000	13,965	20,085	64,050	122,360
<b>Percent of total households, all types</b>									
Small related	37.1%	13.5%	7.5%	58.2%	19.3%	8.9%	13.7%	41.8%	100.0%
Large related	28.2%	13.3%	6.1%	47.6%	24.1%	13.8%	14.5%	52.4%	100.0%
Elderly	14.5%	7.6%	5.5%	27.6%	33.1%	16.6%	22.7%	72.4%	100.0%
Other	29.7%	15.8%	8.8%	54.2%	23.7%	8.5%	13.6%	45.8%	100.0%
Total need by income	28.4%	12.1%	7.1%	47.7%	24.5%	11.4%	16.4%	52.3%	100.0%

Source: Chas, 2015-2019 5-year estimates.

On the other hand, a small percentage of renter and owner-occupied units in Puerto Rico experience severe overcrowding or are overcrowded. The CHAS report also reflected that 2,340 low- and moderate-income households were living in severely crowded conditions (1.51 people per room), among which renters accounted for a larger share (1,525) than homeowners (815). Very low-income households (0-30% AMI renters) accounted for the largest share of severe cases, with 1,175 renters and 505 owners. The other of the largest group was 50-80% AMI with 660 severe cases.

#### Crowding (More than one person per room)

	Renter						Owner					
	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI	Total	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI	Total
Single family households	865	265	505	175	475	2,285	255	225	410	205	1,755	2,850
Multiple, unrelated family households	135	60	45	40	165	445	250	75	185	25	545	1,080

	Renter						Owner					
	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI	Total	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI	Total
Other, non-family households	175	25	85	4	130	419	-	10	15	10	145	180
Total need by income	1,175	350	635	219	770	3,149	505	310	610	240	2,445	4,110

Source: Chas, 2015-2019 5-year estimates.

	Renter				Owner			
	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	Total	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	Total
<b>Households with children present</b>	31,210	9,395	11,225	<b>51,830</b>	6,325	4,390	8,175	<b>18,890</b>

Source: Chas, 2015-2019 5-year estimates.

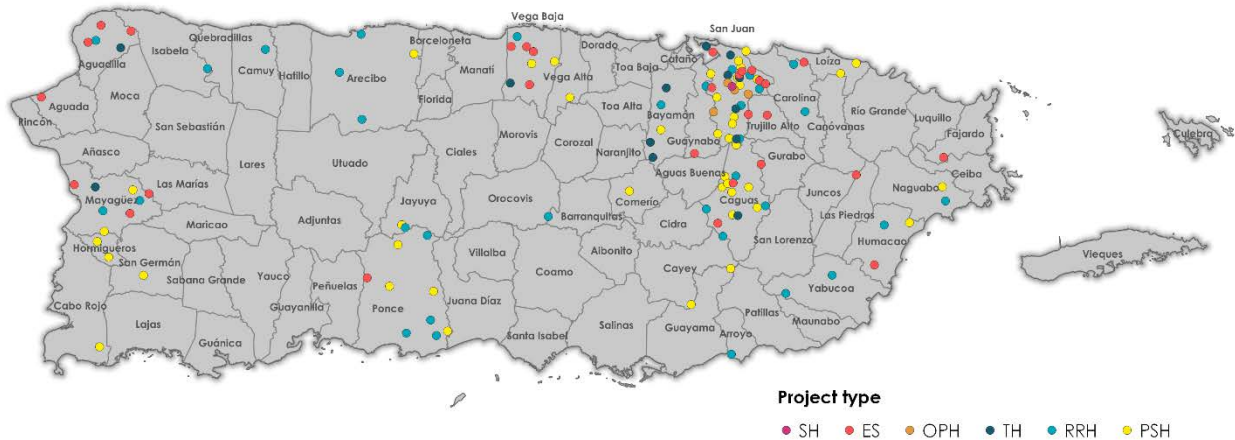
***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):***

In Puerto Rico, one of the main sources of funds to address homelessness are the resources that come from the Federal Government, especially the U.S. Department of Housing and Urban Development (HUD). These funds are used in conjunction with local sources to promote housing access and stability for the homeless, at-risk of homelessness, and other vulnerable populations. In the 2022 program year, the Government of Puerto Rico received a total of \$47,323,012 in formula allocations for CPD programs, including CDBG (\$22,595,084), HOME (\$14,800,052) ESG (\$3,493,404) HOPWA (\$2,369,813) and HTF (\$4,064,659). In the case of funds specifically directed to transitional and permanent housing, the existing CoCs in Puerto Rico (PR 502 and PR 503), competed and received a total of \$22,711,802 in aggregate during fiscal year 2021. In the context of COVID-19, in addition to HOME-ARP funds, the state was the recipient of several special allocations from these Programs. In the case of CDBG-CV a total of three (3) allocations totaling \$33,178,921 were received, while as part of the ESG-CV Program \$34,774,735 was received in the regular and reallocation rounds. HOPWA-CV received \$320,707. In the case of CDBG-CV funds, the entitlement municipalities are carrying out a series of activities, one of the main ones being the emergency payment to cover mortgage, rent and utility arrears, thus complementing other resources available for prevention services (rent and utility payments). ESG-

CV, on the other hand, has dedicated a large part of these resources to the construction of non-congregate shelters and expects to develop around seven in different parts of the Island. In the case of the rapid re-housing activity for which a significant proportion of ESG-CV funds have also been directed, service providers have faced the ongoing difficulty of finding affordable rental housing to place participants. **Precisely, these are some of the reasons why PRHFA has decided (based also on the need assessment conducted) to direct resources primarily to the production of affordable rental housing.**

The funds described above, in combination with local economic resources, have provided for the creation of a network of projects aimed at addressing the various stages of the continuum of care for the homeless population. According to the most recent Housing Inventory Count carried out by the CoCs, in Puerto Rico there is a total inventory of 138 projects aimed at addressing homelessness in Puerto Rico.

### Housing Projects by type according to the HIC 2022



Among the projects, 46 permanent housing projects with supportive services, 37 rapid rehousing projects, and 35 emergency shelters. Similarly, 15 transitional housing projects were identified, four permanent housing only and one as Save Haven. However, the inventory of projects addressing homelessness has suffered a reduction compared to five years ago, from 163 in 2017 to 138 in 2022. It should be noted that the most significant decreases were observed in transitional housing projects (-24), emergency shelters (-9), and rapid rehousing (-9). Geographically, most of the available inventory was identified in the Municipality of San Juan, including temporary housing projects (SH, ES, TH). In contrast, permanent housing projects (RRH, OPH, PSH) were primarily identified in San Juan and Caguas.

On the other hand, these 138 projects provide 3,267 beds, of which 76% correspond to beds in permanent housing projects and the remaining 24% in temporary projects. Among the 138 projects, 56 have beds for families with children, 39 have dedicated beds for people with a chronic homelessness problem, 14 are focused on the population fleeing violence, and 12 are aimed at the population with a positive diagnosis of HIV. In addition, there are eight projects with separate beds for veterans. In terms of counting the beds available by population (3,267), there are currently 1,567 separate beds for people with a chronic homelessness problem, 776 beds for families with children, 373 beds for the population fleeing violence, 343 separate beds for veterans, and 231 beds for the people with a positive diagnosis of HIV.

***Describe the unmet housing and service needs of qualifying populations:  
Homeless as defined in 24 CFR 91.5 Enter narrative response here.***

- ***At Risk of Homelessness as defined in 24 CFR 91.5***
- ***Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice***
- ***Other prevent homelessness and populations requiring services or housing assistance to other populations at greatest risk of housing instability as defined by HUD in the Notice***

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

**Existing gaps in the current shelter inventory**

The Homeless Needs Inventory and Gap Analysis in table 1 shows a gap of 1,800 units and 2,018 beds in adults only, while in families, a gap of 65 units and 197 beds was identified. However, after considering the level of beds available in the current inventory, that gap narrowed to 1,685 housing units and 1,872 beds among adults only and 51 units and 154 beds among homeless families.

**Existing gaps in the current housing inventory**

Table 2 included in this plan reflects that there is currently a need for 47,165 households that are currently experiencing one or more severe housing problems. These problems put households at risk of losing their homes and becoming homeless. Similarly, it should be noted that of the 380,030 rental units available, only 129,790 are available for persons at risk of homelessness, representing 34.2% of the total rental units available in inventory.

When focusing on the other populations that require housing services or assistance to avoid facing a situation of homelessness and populations at greater risk of presenting housing instability, the PJ identified the existence of 380,030 housing units in inventory for people who are not currently experiencing homelessness in table #2. Among the 380,030 units, 129,790 (34.2%) correspond to rental units affordable to households in the 30% of the Area Median income at risk of homelessness and 53,115 (14%) affordable to households at 50% of the Area Median income, which includes the other populations.

However, when evaluating the current level of need, a gap of 71,360 non-homeless households was identified by the PJ (Puerto Rico). At the individual level, the PJ found 47,165 households in the Area with a Median income between 0%-30% with one or more severe housing problems and at risk of homelessness and 24,465 households between 30%-50 % of the Area's Median Income who have one or more severe housing problems and who are distributed among other populations.

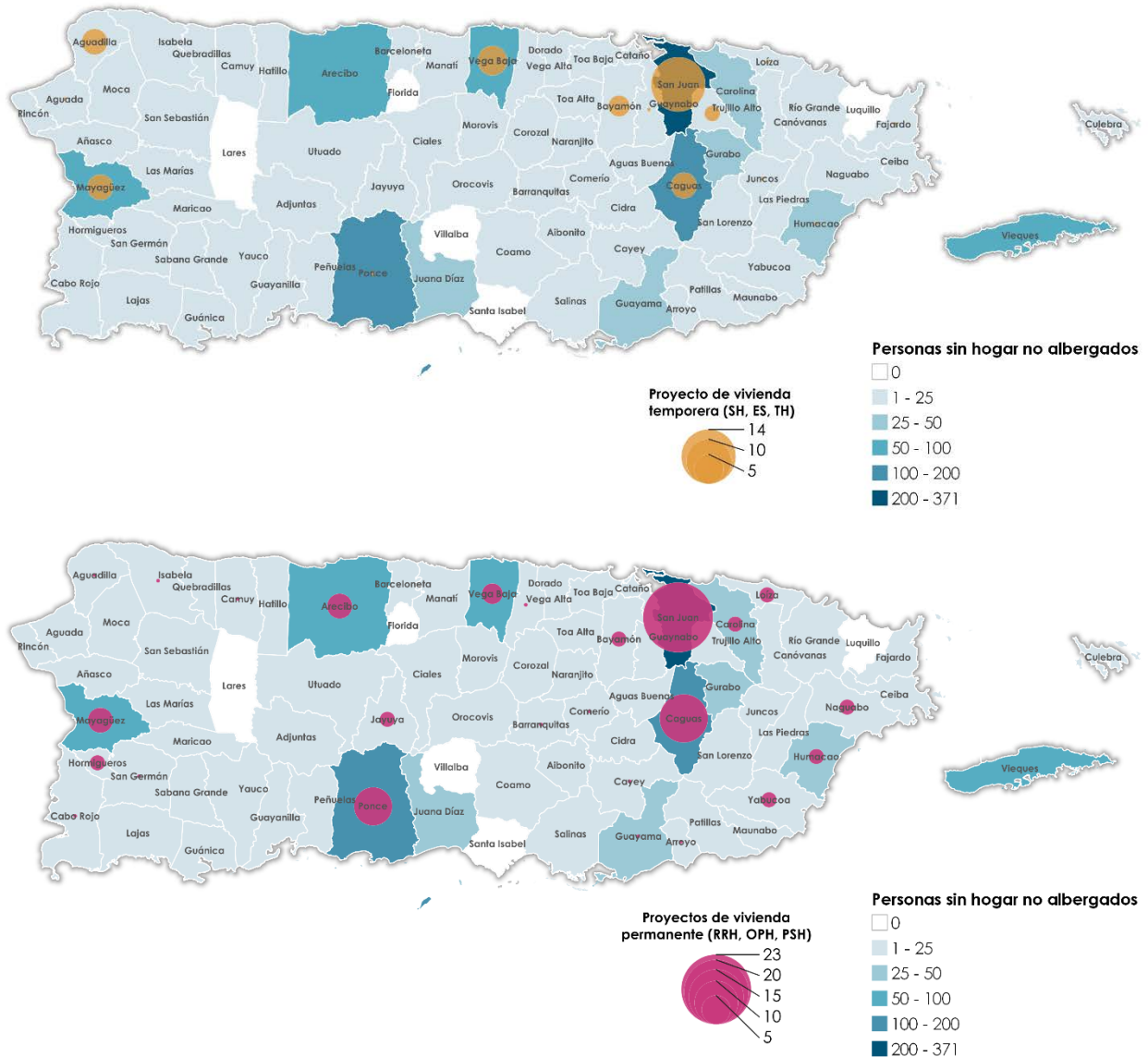
***Identify priority needs for qualifying populations:***

The needs analysis conducted, and the input received from the stakeholders reflect that the primary needs related to qualifying populations are related to access to affordable rental housing and permanent housing projects with supportive services. There is also a need for additional resources for entities that currently provide housing services to supplement their services through supportive services. At the macro level, taking into consideration the trends in the housing market in Puerto Rico there is a need to strengthen the capacities of the organizations that work with housing production on the Island. It is also important to note that these needs are reflected differently in



geographic terms, with some regions of the island having a greater need for this type of project, as illustrated in the following maps.

**Homeless persons identified and types of projects available.**



***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:***

In order to determine the level of need and gaps in the shelter and housing inventory, a combination of methods was used, including the analysis of information from the homeless count and bed inventory conducted by the two CoCs operating in Puerto Rico, information from the Population and Housing Census, particularly the CHAS produced by HUD, and other secondary sources. This information was combined with information from consultations and citizen participation processes. This included focus group sessions with stakeholders and a web-based survey.

## HOME-ARP Activities

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

For purposes of distributing the funds, the PRHFA will use a competitive process in order to select developers and/or sub-recipients to implement the activities. The guidelines for submitting proposals and the specific criteria to be established for eligible entities will be published in a newspaper of national circulation, on the AFV's website, and at the agency's facilities. The proposals received will be evaluated by a committee to be established by the Executive Director for the selection of the projects to be subsidized.

*Describe whether the PJ will administer eligible activities directly:*

The PJ will administer the eligible activities directly.

*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 funds are going to be allocated to a sub-recipient or contractor to administer the entire HOME-ARP program prior to HUD's acceptance of this plan.

### Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 4,958,442.30		
Acquisition and Development of Non-Congregate Shelters	\$ -		
Tenant Based Rental Assistance (TBRA)	\$ 1,000,000		
Development of Affordable Rental Housing	\$ 32,229,874.95		
Non-Profit Operating	\$ 2,479,221.15	5 %	5%
Non-Profit Capacity Building	\$ 1,479,221.15	2.9 %	5%
Administration and Planning	\$ 7,437,663.45	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 49,584,423.00</b>		

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

The analysis conducted showed as the most pressing need, taking into consideration not only the characteristics of the QP but also the resources available, the need for permanent housing, in particular the availability of affordable rental housing and permanent housing projects with supportive services. It is for this reason that PRHFA is directing the majority of resources toward the development of affordable rental housing. However, resources are also being directed to

supportive services due to the conditions observed in the population in need and to strengthen the capacity of organizations working with the housing supply.

## **HOME-ARP Production Housing Goals**

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

Based on the proposed allocation of funds, the PRFHA estimates producing 135 affordable rental housing units for the qualifying population. This includes housing for persons experiencing homelessness, housing for households making less than 30% AMI and those that are at risk of homelessness.

## **Preferences**

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

The PJ will not give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

***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:***

Does not apply

## **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).

***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):***

Following the practice in the HOME program, the PRHFA will use a method of referral based on waiting lists by type of project.

***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 PJ will not use the Coordinated Entry (CE) process.

***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):***

Does not apply.

*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):*

Does not apply.

## **Limitations in a HOME-ARP rental housing or NCS project**

*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 PJ will not limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific 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

## **HOME-ARP Refinancing Guidelines**

- *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.*

Does not apply. The PJ will not use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

- *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.*

Does not apply. The PJ will not use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

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

Does not apply. The PJ will not use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***  
Does not apply. The PJ will not use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***  
Does not apply. The PJ will not use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.
- ***Other requirements in the PJ's guidelines, if applicable:***  
Does not apply. The PJ will not use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.