



St. Clair County, IL  
Program Year 2021

HOME Investment Partnership Funding –  
American Rescue Plan

Allocation Plan

Mark A. Kern, Chairman  
St. Clair County Board

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## Introduction

St. Clair County has been allocated \$3,762,217 in HOME Investment Partnership funding – American Rescue Plan (HOME-ARP) from the US Department of Housing and Urban Development (HUD). This allocation plan outlines St. Clair County’s intended use of its HOME-ARP funds.

In accordance with HUD requirements, HOME-ARP funds may be used for “development and support of affordable housing, tenant-based rental assistance (TBRA), provision of supportive services and acquisition and development of non-congregate shelter units” for specific qualifying populations (QP’s).” The QP’s are as follows:

- Homeless as defined in 24 CFR 91.5
- 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 (referred herein as domestic violence/sexual assault/trafficking);
- Other populations who do not qualify under any of the populations above but meet one of the following criteria:
  - Other families requiring services or housing assistance to prevent homelessness
  - Those at greater risk of housing instability

The Allocation Plan will be a part of a substantial amendment to St. Clair County’s PY 2021 Annual Action plan and PY 2020-2024 Consolidated Plan.

## Consultation

### Summary of the Consultation Process

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

This plan is the product of extensive consultation with over a dozen agencies, groups, and organizations involved in the development of affordable housing and/or provision of services to children, elderly persons, persons with disabilities and homeless persons. The consultation methods include an online survey that was made available for 10 days commencing on November 10, 2022. Thirteen individual responses from individuals representing 12 unique organizations that are all members of the St. Clair County Continuum of Care (CoC) were received. Eleven of the 13 respondents indicated that their geographic service area was all of St. Clair County.

The survey results were presented to the CoC on January 10, 2023. There were 28 individuals in attendance, representing 20 unique CoC member agencies, organizations, and individual members. This consultation focused on seeking information about current programs, initiatives, and needs within these

agencies, their upcoming plans, goals, and what gaps they see in trying to make these goals a reality. This list of represented organizations and agencies is provided in the following table.

**List of the organizations, agencies, and individuals who participated in the 01/10/2023 CoC Meeting:**

| <b>Organization/Agency/Individual Name</b>    | <b>Homeless Service Provider</b> | <b>Domestic Violence Service Provider</b> | <b>Public Housing Agency</b> | <b>Public Agencies that address the needs of qualifying populations</b> | <b>Public/ Private organizations that address civil rights and fair housing</b> | <b>Public/ Private organizations that address the needs of persons with disabilities</b> |
|-----------------------------------------------|----------------------------------|-------------------------------------------|------------------------------|-------------------------------------------------------------------------|---------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| Comprehensive Behavioral Health Center        | X                                |                                           |                              | X                                                                       | X                                                                               | X                                                                                        |
| Challenge Unlimited                           | X                                |                                           |                              |                                                                         |                                                                                 | X                                                                                        |
| Urban League of St. Louis                     | X                                |                                           |                              |                                                                         | X                                                                               | X                                                                                        |
| St. Clair County Housing Authority            |                                  |                                           | X                            |                                                                         |                                                                                 |                                                                                          |
| Caritas Family Solutions                      |                                  |                                           |                              | X                                                                       | X                                                                               | X                                                                                        |
| SIHF-Healthcare                               | X                                |                                           |                              |                                                                         |                                                                                 | X                                                                                        |
| Violence Prevention Center of Southwestern IL |                                  | X                                         |                              |                                                                         |                                                                                 |                                                                                          |
| Quinetta Grant, General Member                |                                  |                                           |                              | X                                                                       |                                                                                 |                                                                                          |
| Chestnut Health Systems                       | X                                |                                           |                              |                                                                         |                                                                                 | X                                                                                        |
| St. Louis VA                                  | X                                |                                           |                              |                                                                         |                                                                                 |                                                                                          |
| St. Clair County IGD                          |                                  |                                           |                              |                                                                         |                                                                                 |                                                                                          |
| St. Clair County Health Department            | X                                | X                                         |                              | X                                                                       |                                                                                 | X                                                                                        |
| The Joseph Center                             |                                  |                                           |                              |                                                                         |                                                                                 |                                                                                          |
| Call for Help, Inc.                           | X                                | X                                         |                              |                                                                         | X                                                                               | X                                                                                        |
| Children's Home and Aid                       | X                                | X                                         |                              |                                                                         |                                                                                 |                                                                                          |
| Pathways MISI                                 | X                                |                                           |                              |                                                                         |                                                                                 |                                                                                          |
| CDBG Operations                               | X                                | X                                         |                              |                                                                         | X                                                                               | X                                                                                        |
| Faith Lutheran Church of O'Fallon             | X                                |                                           |                              |                                                                         |                                                                                 | X                                                                                        |
| Illinois Center For Autism                    |                                  |                                           |                              |                                                                         |                                                                                 | X                                                                                        |
| Spannaus Consulting                           | X                                |                                           |                              |                                                                         |                                                                                 |                                                                                          |
| Land of Lincoln Legal Aid                     | X                                | X                                         |                              |                                                                         | X                                                                               | X                                                                                        |

A complete draft of this plan will be made available for public review and comment for a 15-day period beginning January 24, 2023 and going until February 10, 2023. The availability of both the draft plan and the final plan is advertised in the local newspaper and the complete documents are available for review on the County's website ([www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx](http://www.co.st-clair.il.us/departments/grants/development/Pages/default.aspx)) and in print form at the offices of the St. Clair County Intergovernmental Grants Department (19 Public Square, Suite 200, Belleville, Illinois 62220-1624) and the East St. Louis Public Library, 5300 State Street,

East St. Louis, IL. It will also be made available in a form accessible to people with impaired vision and to non-English speaking residents upon request.

***List of the organizations who responded to the online survey:***

| <b>Agency/Org Consulted</b>                         | <b>Type of Agency/Org</b>                                                                                                                                                                                                   | <b>Method of Consultation</b> | <b>Feedback</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|-----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>CDBG OPERATIONS CORPORATION</b>                  | Emergency/Temporary Shelter Provider<br>Permanent Supportive Housing Provider<br>Supportive Services Provider<br>Housing Provider/Landlord/Property Manager                                                                 | Survey                        | Identified lack of affordable housing as great unmet need for qualifying populations and selected “development of affordable housing, including Permanent Supportive Housing” as top priority for use of HOME-ARP Funds. Respondent stated that “development of units is number one priority.”                                                                                                                                                                                                                                                  |
| <b>Urban League of Metropolitan St. Louis, Inc.</b> | Supportive Services Provider<br>Other Organization addressing the Needs of People Experiencing or At Risk of Homelessness; People Fleeing Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking | Survey                        | Housing for people at risk of homelessness and at high risk of housing instability is the biggest unmet need for qualifying populations. There is not enough housing available in private and public sector, therefore, rental assistance and services were selected as two highest priorities for use of HOME-ARP funds. Respondent stated that “We currently have a waiting list of over 60 clients in need of rental and mortgage assistance. Being able to provide assistance can help make sure decrease homelessness for these families.” |
| <b>Catholic Urban Programs</b>                      | Emergency/Temporary Shelter Provider                                                                                                                                                                                        | Survey                        | Families experiencing homelessness and lack of                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

|                                 |                                                                                                                                                                                                              |        |                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|---------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                 | Other Organization addressing the Needs of People Experiencing or At Risk of Homelessness; People Fleeing Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking                  |        | housing are the unmet needs identified among qualifying populations. Desire to see qualifying populations go from “homeless to housed.” The highest priority for use of HOME-ARP funds was identified as services, including case management, legal services, moving cost assistance, etc.                                                                                                                                                    |
| <b>DOORWAYS</b>                 | Emergency/Temporary Shelter Provider<br>Permanent Supportive Housing Provider<br>Supportive Services Provider<br>Housing Provider/Landlord/Property Manager<br>Organization Serving People with Disabilities | Survey | Unmet housing needs for qualifying populations were identified as funds for people at risk of homelessness and emergency shelter funds for hotel/motel stays. The two highest priority uses of HOME-ARP funds are rental assistance and services. The respondent stated that “There is not sufficient rental assistance for people who are at risk of homelessness and once housed people need supportive services to maintain that housing.” |
| <b>Caritas Family Solutions</b> | Permanent Supportive Housing Provider                                                                                                                                                                        | Survey | Respondent indicated that housing for families with support during and after impacting events was the greatest unmet housing need among qualifying populations, and services and supports are lacking, inconsistent, and difficult to access. The highest priority use of HOME-ARP funds was identified as acquisition/development of non-congregant shelter                                                                                  |

|                                           |                                            |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------|--------------------------------------------|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                           |                                            |        | units. Specific needs identified were “acquisition of additional housing and provision of supportive services.” Further, the respondent stated that “permanent supportive housing is the top need.”                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>St. Clair County Housing Authority</b> | Housing Provider/Landlord/Property Manager | Survey | <p>Unmet housing needs for qualifying populations were identified as follows:</p> <p>Insufficient supply of all types of housing, including emergency, transitional, and permanent housing.</p> <p>Inadequate supportive services to truly address the underlying reasons why qualifying populations experience homelessness. Clients need extensive services and training to allow them to reach a point where they can adequately maintain a home (apartment). The respondent indicated that gaps in the current shelter and housing inventory included long-term, sustained supportive services for targeted populations and identified development of affordable housing, including Permanent Supportive Housing, and Services as the two highest priority uses of HOME-ARP funds. The respondent explained these selections by stating “Again, there is a lack of affordable housing of all types in the community (emergency, shelters, transitional, and permanent housing). I see too many families go through the system, get settled, supportive services end and the family slips back into unstable</p> |

|                                                                             |                                                                                                                                                                                                                                                                                      |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                             |                                                                                                                                                                                                                                                                                      |        | housing situation. The cycle repeats itself too often.”                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Land of Lincoln Legal Aid</b>                                            | Other Organization addressing the Needs of People Experiencing or At Risk of Homelessness; People Fleeing Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking; Supportive Services Provider; Organization that addresses civil rights and fair housing | Survey | Poor housing conditions and lack of repairs was identified as an unmet housing need for qualifying populations, with lack of affordable housing and rental assistance listed as gaps in the current shelter and housing inventory. The two highest priority uses for HOME-ARP funds were identified as development of affordable housing, including Permanent Supportive Housing, and services. The respondent stated that “As an eviction attorney, I service people who cannot afford their rent, and whose housing is in disrepair.” A second respondent from this organization stated that “immediate housing is needed for the people and additional help with moving in, legal issues and follow up case management.” |
| <b>St. Clair County Intergovernmental Grants &amp; Economic Development</b> | Other Organization addressing the Needs of People Experiencing or At Risk of Homelessness; People Fleeing Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking                                                                                          | Survey | The greatest unmet housing need among qualified populations was identified as lack of affordable housing. In response to a question regarding gaps in the shelter and housing inventory, the respondent stated that “Shelters and low-income housing units seem to be declining.” The two highest priority uses of HOME-ARP funds were identified as development of affordable housing, including                                                                                                                                                                                                                                                                                                                           |

|                              |                                       |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
|------------------------------|---------------------------------------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                              |                                       |        | <p>Permanent Supportive Housing, and Acquisition/Development of Non-Congregate Shelter Units. The respondent explained that “our current housing stock seems to be declining. Many of our existing housing providers are getting out of the business since covid.”</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Inspired Incorporated</b> | Homeless Supportive Services Provider | Survey | <p>Unmet housing and service needs among qualifying populations were identified as follows: Mental Illness, medication stabilization, substance use disorder, ADL concerns after chronic homelessness. Gaps in the service delivery system in St. Clair County were listed as “emergency access especially during afterhours and weekend.” The two highest priority uses for HOME-ARP funds were identified as development of affordable housing, including Permanent Supportive Housing, and Acquisition/Development of Non-Congregate Shelter Units. The respondent explained that the “Ultimate goal is to eliminate homelessness therefore permanent housing with supportive services to assist client sustain and maintain housing is a priority. Permanent housing especially for chronically homeless population is limited therefore more housing is needed. COVID-19 changed operational standards for many congregated settings thus to decrease the spread non-</p> |

|                                                                                |                                                                                                                              |               |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|--------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------|---------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                |                                                                                                                              |               | <p>congregated shelter units would be a proactive placement plan, but it will also address the operation of drop-in centers that only afford night accommodations that require the homeless to leave during the day. During extreme weather, the SOP increases health risks and fails to address the true homeless need.”</p>                                                                                                                                                                                                                                |
| <p><b>Violence Prevention Center</b></p>                                       | <p>Emergency/Temporary Shelter Provider</p>                                                                                  | <p>Survey</p> | <p>Lack of landlord support was listed as unmet need for qualifying populations and lack of affordable housing was identified as a gap within the current shelter and housing inventory in St. Clair County. The two highest priority uses for HOME-ARP funds were identified as development of affordable housing, including Permanent Supportive Housing, and rental assistance. The respondent further stated that “Affordable housing along with assistance with deposits, application fees and outstanding utility assistance is very much needed.”</p> |
| <p><b>Comprehensive Behavioral Health Center of St. Clair County, Inc.</b></p> | <p>Permanent Supportive Housing Provider<br/>Supportive Services Provider<br/>Housing Provider/Landlord/Property Manager</p> | <p>Survey</p> | <p>In response to a question about the unmet housing service needs among qualifying populations, the respondent stated “This is a long list. From our perspective, it is hard for people to battle serious mental illness and or substance use disorder when they don't have a place to live. Once they are housed then we don't have</p>                                                                                                                                                                                                                    |

|                                                    |                                                                                                                                                                                             |        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                    |                                                                                                                                                                                             |        | <p>enough case managers or transportation assets to get them reliably transported to appointments on time.” Gaps in the current shelter and housing inventory were identified as shortage of both shelter accommodations and affordable housing units, and transportation for those who have been placed into housing. The two highest priority uses of HOME-ARP funds were identified as development of affordable housing, including Permanent Supportive Housing, and Services. The respondent reiterated that transportation was a barrier, stating that “Our ability to provide effective behavioral health and substance use disorder services to the homeless and to the population that is housed by supportive housing programs is limited by the problem of transporting clients to their appointments.”</p> |
| <b>Chestnut Health Systems -MetroLink Outreach</b> | Other Organization addressing the Needs of People Experiencing or At Risk of Homelessness; People Fleeing Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking | Survey | <p>In response to a question about unmet housing and service needs for qualifying populations the respondent indicated that shelter space is insufficient and that there has been a drop in availability, adding “There is one drop in in the county. There are also no male shelters and there is no availability in the female shelters. The housing hotline has made improvements to staffing however the housing waitlist is</p>                                                                                                                                                                                                                                                                                                                                                                                   |

|  |  |  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|--|--|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |  |  | <p>approximately 3 years long.”</p> <p>The two highest priority uses for HOME-ARP funds were identified as development of affordable housing, including Permanent Supportive Housing, and Acquisition/Development of Non-Congregate Shelter Units. The respondent stated “Our outreach team encounters multiple individuals who report being unhoused. These individuals are referred to SVDP however this agency is often overcrowded and has multiple reports of safety concerns. The county does not have any male shelters and there is not availability in female shelters. Those who are unhoused have minimal options to seek shelter, especially in the cold weather therefore they abuse resources such as hospitals, to seek safety. The current housing waitlist is approximately 3 years long so finding long term permanent housing is also an obstacle. Surrounding counties are also experiencing the same issue(s) so those who are unhoused have minimal resources.”</p> |
|--|--|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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

Through an online survey, IGD received thirteen responses from twelve different agencies regarding the housing and service needs for Qualifying Populations and priority uses for HOME-ARP funds. The twelve organizations that participated in the survey represented: affordable housing providers, homeless service providers, emergency shelters, disabilities providers, veterans’ groups, domestic violence and human trafficking groups and sheltering, mental health providers, civil rights groups and organizations, and other groups that work with the Qualifying Populations.

Survey respondents agreed that the community does not have sufficient rental and permanent housing capacity to prevent and end homelessness. Affordable and income-based housing were identified as the biggest gaps in the housing inventory, with ten of the thirteen respondents selecting “development of affordable housing, including Permanent Supportive Housing” as a high priority use for HOME-ARP funds. Supportive Services, including case management, legal services, moving cost assistance, etc. was the second most selected priority for use of HOME-ARP funds, with seven respondents indicating that this was one of two highest priorities for their organization.

***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: 12/29/2022***
- ***Public comment period: start date – 1/24/2023 end date – 2/10/2023***
- ***Date(s) of public hearing: 1/25/2023***

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

On December 29, 2022, St. Clair County published notice in the Belleville News Democrat and the East St. Louis Monitor newspaper that a Public Hearing on the draft allocation plan would be held at 2:00 p.m. on January 25, 2023. Further, the public notice stated that the draft plan would be made available on January 24, 2023, allowing for public comment and question to be submitted for a 15-day period ending at 4:00 p.m. on February 10, 2023. As part of St. Clair County’s Public Hearing process, citizens are allowed to ask questions and openly share their ideas. The Public Hearing has intentionally been scheduled near the beginning of the comment period in order to give citizens time to hear the information at the hearing and give feedback. The newspaper publication also outlines a phone number, email address, and physical address where any written comments may be submitted as well. Once the comment period is over, citizen comments are analyzed.

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

The draft allocation plan was placed at easily accessible public locations in Belleville and East St. Louis. In Belleville, the draft plan was made available at the St. Clair County IGD office and in East St. Louis the draft plan was made available at the East St. Louis Public Library. Further, the draft allocation plan was placed on St. Clair County’s website for viewing. The Public hearing was scheduled for 2:00 pm to accommodate more citizens during work hours.

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

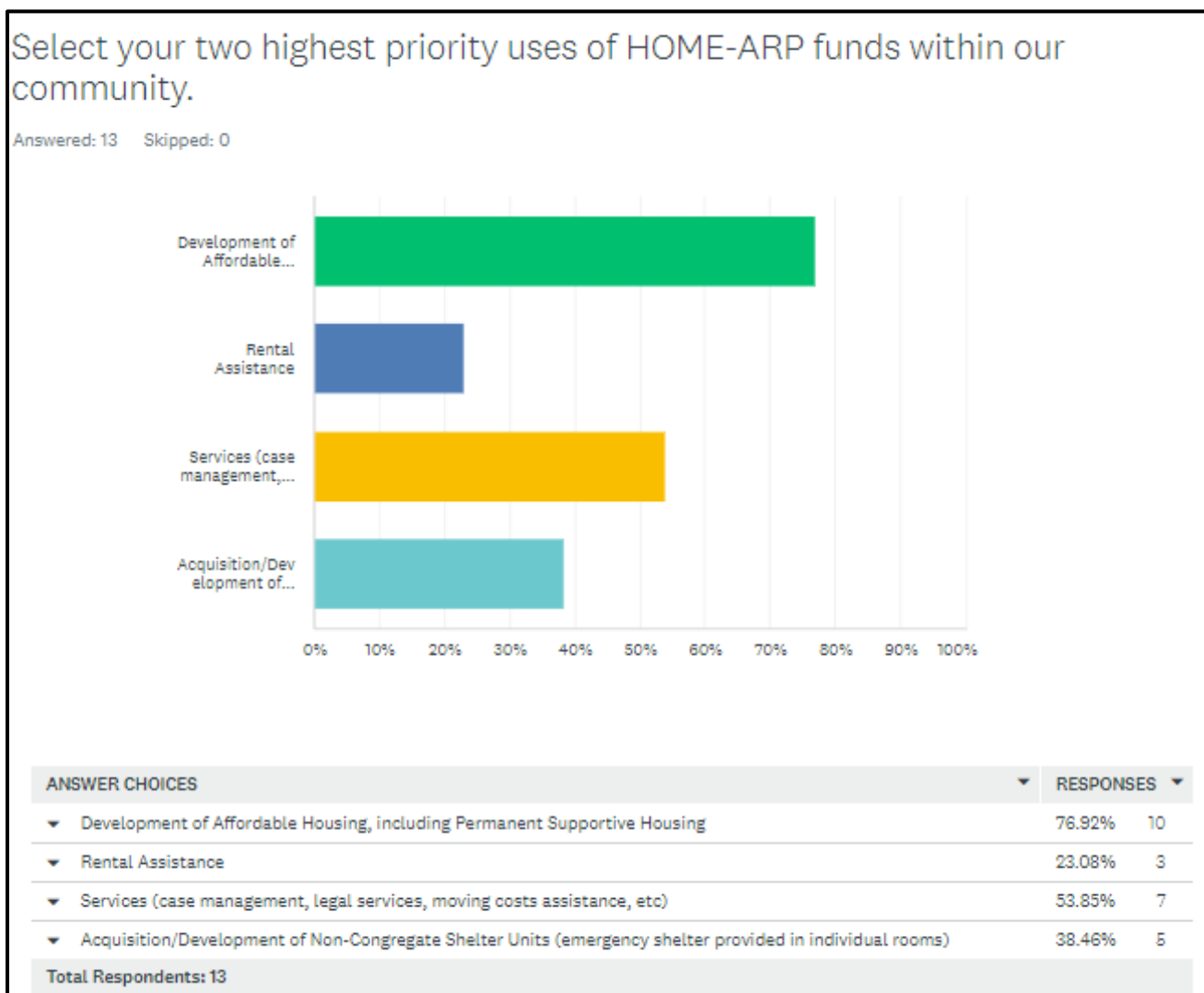
All public comments have been uploaded as attachments to the HOME-ARP Allocation Plan.

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

IGD was diligent in seeking and incorporating broad-based community input to guide its HOME-ARP fund allocation. All comments and recommendations were received, accepted, and considered during the preparation of the HOME-ARP Allocation Plan. The final version of the HOME-ARP Allocation Plan, as submitted to HUD, incorporates all comments received as a part of the citizen participation process.

## Needs Assessment and Gaps Analysis

The Needs Assessment and Gaps Analysis examines the size and composition of qualifying populations, identifies current resources available, assesses unmet housing and services needs of these populations, and calls attention to existing gaps. During the consultation process, IGD asked survey participants to select the two highest priority uses for HOME-ARP funds. The majority of participants selected Development of Affordable Housing, including Permanent Supportive Housing, as a high priority (77%), followed by Supportive Services (54%), including case management, legal services, moving cost assistance, etc., Acquisition/development of non-congregate shelter units (38%), and finally rental assistance (23%).



***St. Clair County, in accordance with Section V.C.1 of the Notice (page 14), 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***

**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            | 32                | 10         | 19          | 19         | 10        |                              |                      |      |               |              |            |             |            |
| Transitional Housing         | 100               | 34         | 35          | 35         | 15        |                              |                      |      |               |              |            |             |            |
| Permanent Supportive Housing | 138               | 56         | 128         | 128        | 15        |                              |                      |      |               |              |            |             |            |
| Other Permanent Housing      | 60                | 24         | 24          | 0          | 0         |                              |                      |      |               |              |            |             |            |
| Sheltered Homeless           |                   |            |             |            |           | 62                           | 41                   | 20   | 23            |              |            |             |            |
| Unsheltered Homeless         |                   |            |             |            |           | 0                            | 94                   | 0    | 7             |              |            |             |            |
| <b>Current Gap</b>           |                   |            |             |            |           |                              |                      |      |               | -176         | 30         | -9          | 15         |

Information provided by St. Clair County Continuum of Care 2022 Point in Time Results

|              | Sheltered Persons    | Unsheltered Persons    | Total |
|--------------|----------------------|------------------------|-------|
| # Persons    | 103                  | 94                     | 197   |
|              |                      |                        |       |
|              | Sheltered Households | Unsheltered Households | Total |
| # Households | 62                   | 92                     | 154   |

Information provided by St. Clair County Continuum of Care 2022 Point in Time Results

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

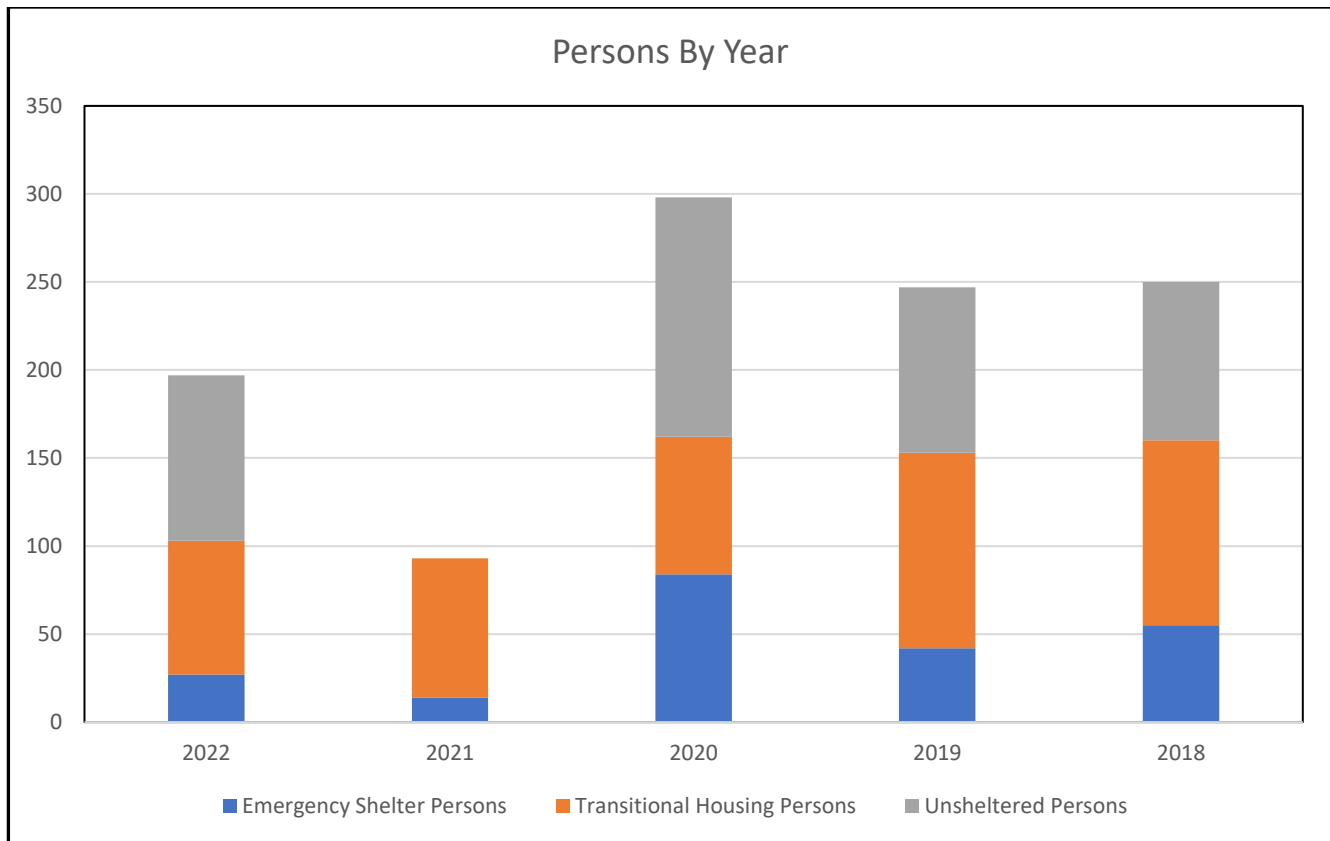
***Homeless as defined in 24 CFR 91.5***

Pursuant to the HOME-ARP Notice (CPD-21-10), HUD defines the homeless as an individual or family who lacks a fixed, regular, and adequate nighttime residence; an individual or family who will imminently lose their primary nighttime residence; or unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but are defined as

homeless under the Runaway and Homeless Youth Act, the Head Start Act, the Public Health Service Act, the Food and Nutrition Act of 2008, the Child Nutrition Act of 1966, or the McKinney-Vento Homeless Assistance Act. This qualified population is further defined at 24 CFR 91.5. Every year, communities across the country are required by HUD to conduct a census of the number of people experiencing homelessness on a single night in January, called the Point-in-Time (PIT) count. In addition to counting anyone staying in an emergency shelter on that night, outreach is conducted to identify persons spending the night outdoors or in places not meant for human habitation. The PIT count identifies the number of people who were homeless on one particular night. By itself, the PIT count is not a reliable predictor of how many people will be homeless or receive housing resources in a year. However, when used along with other data, it can provide key information on the state of homelessness currently, and over time

### **2022 - 2018 Point-in-Time Summary for All Household Types**

Based upon a comparison of PIT count numbers (shown below) for the East St. Louis, Belleville/St. Clair County Continuum of Care for 2018 through 2022, the total number of homeless individuals has decreased from 250 individuals in 2018 to 197 individuals in 2022. The PIT data also indicates that the number of unsheltered homeless individuals has remained about the same. During the 5-year period under review, the number of homeless individuals decreases slightly from 2018 to 2019, then spikes in 2020 due to a 20% increase in unsheltered persons. The next two years show a decrease in sheltered persons, and the number of unsheltered persons returns to 94 in 2022. However, the number of homeless households decreased from 2020 to 2021, indicating that households consisting of a larger number of individuals may have become homeless between 2020 and 2021.



**Note:** The data provided above is for all household types, including both Adult Only and Adults & Children Household Types.

### 2022 Point-In-Time Demographics at a Glance

|                                                                                     |                                                                                              |            |
|-------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------|------------|
|  | <b>Sheltered Persons (staying in emergency shelter or transitional housing)</b>              | <b>103</b> |
|  | <b>Unsheltered Persons (persons living outside or places not meant for human habitation)</b> | <b>94</b>  |
|  | <b>Families (households with at least one adult and one child)</b>                           | <b>21</b>  |
|  | <b>Individuals (adults without children)</b>                                                 | <b>94</b>  |
|  | <b>Children (under 18)</b>                                                                   | <b>39</b>  |

|                                                                                   |                          |           |
|-----------------------------------------------------------------------------------|--------------------------|-----------|
|  | <b>Youth (age 18-24)</b> | <b>18</b> |
|  | <b>Veterans</b>          | <b>20</b> |

#### Race

American Indian, Alaska Native, or Indigenous  
Asian or Asian American  
Black, African American, or African  
Native Hawaiian or Pacific Islander  
White  
Multiple Races

| Sheltered |              |            | Unsheltered | Total |
|-----------|--------------|------------|-------------|-------|
| Emergency | Transitional | Safe Haven |             |       |
| 0         | 0            | 0          | 0           | 0     |
| 0         | 0            | 0          | 0           | 0     |
| 18        | 59           | 0          | 63          | 140   |
| 0         | 0            | 0          | 0           | 0     |
| 8         | 14           | 0          | 30          | 52    |
| 1         | 3            | 0          | 1           | 5     |

#### Total Households and Persons

Total Number Of Households  
Total Number of Persons  
Number of Children (under age 18)  
Number of Persons (18 to 24)  
Number of Persons (over age 24)

| Sheltered |              |                         | Unsheltered | Total |
|-----------|--------------|-------------------------|-------------|-------|
| Emergency | Transitional | Safe Haven <sup>a</sup> |             |       |
| 17        | 45           | 0                       | 92          | 154   |
| 27        | 76           | 0                       | 94          | 197   |
| 9         | 30           | 0                       | 0           | 39    |
| 1         | 11           | 0                       | 7           | 19    |
| 17        | 35           | 0                       | 87          | 139   |

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

In 2021, the CoC provided homeless prevention services to 211 households. In 2022, services were provided to 79 households. The decrease is due to the spending down of CARES ACT resources and the lack of access to traditional ESG funding.

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

The number of St. Clair County families who are victims of human trafficking, domestic violence, dating violence, sexual assault and stalking is unknown. However, some measures are available via the Continuum of Care and the Uniform Crime Reporting program that help shed light on the question. The St. Clair County Continuum of Care Homeless Point in Time Count for 2022 identified 29 homeless adult victims of domestic violence - 22 sheltered and 7 unsheltered - although it is important to note that tracking and establishing a reliable count of the homeless population is extremely difficult and there is widespread agreement that Point In Time counts underreport the true measure of need in a community. The Crime in Illinois 2020 Annual Uniform Crime Report from the Illinois State Police shows 139 documented forcible rapes in 2020 for St. Clair County. The same report shows 637 documented domestic-related offenses in 2020 and 2 documented human tracking related sex acts in 2019 for St. Clair County.

***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***

There is a great demand for affordable housing in the St. Clair County, as demonstrated by the waiting lists for Public Housing and the Section 8 Housing Choice Voucher (HCV) Programs, as shown below in the wait list summary report by location and bedroom size for the Public Housing Program and the Section 8 HCVP as of January 3, 2023. As of January 2023, there were 5,942 households on the Section 8 HCVP wait list (this is an unduplicated count). Although the Section 8 HCVP wait list is not separated by bedroom size needed (it is a single combined list), the number of families by number of bedrooms needed is tracked for planning and informational purposes and is provided below:

**HOUSING CHOICE VOUCHER WAIT LIST (JANUARY 3, 2023)**

|                                                  | 1 BR  | 2 BR  | 3 BR  | 4 BR | 5 BR | 6 BR | Total |
|--------------------------------------------------|-------|-------|-------|------|------|------|-------|
| <b>Number of Applicants (Unduplicated Count)</b> | 2,387 | 2,012 | 1,187 | 309  | 45   | 2    | 5,942 |

SOURCE: St. Clair County Housing Authority

SCCHA maintains a site-based waiting list for its Public Housing Program. There are eighteen (18) separate wait lists. Applicants can apply for as many locations as they desire, as long as they meet the occupancy designation requirements for the location and the location has units of appropriate size given family composition. For example, some locations are designated for senior citizens only (those applicants age 62 and older). Other designations include “Elderly only”, which targets applicants age 62 and older or applicants who have a disability, Non-senior disabled only, which are reserved for individuals under the age of 62 with a disability, and general occupancy or family developments. The waiting lists for the Public Housing Program also demonstrate a strong demand for affordable housing. Since applicants can be on multiple public housing waiting lists at the same time, the numbers shown at the bottom of the chart below as “Grand Totals” are inflated because of the duplicated counts. However, the numbers shown as “Totals” in the far-right column reflect the unduplicated count of applicants for that particular location. These numbers demonstrate a strong need for affordable housing in St. Clair County.

**PUBLIC HOUSING WAIT LIST BY LOCATION AND BEDROOM SIZE (JANUARY 1, 2023)**

|                            | 1 BR  | 2 BR | 3 BR | 4 BR | 5 BR | TOTAL |
|----------------------------|-------|------|------|------|------|-------|
| AMBER COURT BELLEVILLE     | 477   | 19   | 0    | 0    | 0    | 496   |
| BEL PLAZA 2 - 47TH ST      | 406   | 0    | 0    | 0    | 0    | 406   |
| BEL-PLAZA 1 - CHURCH ST    | 429   | 0    | 0    | 0    | 0    | 429   |
| BLUFFSIDE APARTMENTS       | 399   | 639  | 328  | 67   | 0    | 1,433 |
| CLAYTON MANOR              | 438   | 218  | 88   | 45   | 0    | 789   |
| ERNEST SMITH - CENTREVILLE | 1,174 | 476  | 49   | 48   | 0    | 1,747 |

|                            |        |       |       |     |   |        |
|----------------------------|--------|-------|-------|-----|---|--------|
| FULLERTON - SWANSEA        | 531    | 0     | 0     | 0   | 0 | 531    |
| GARDENWOOD APARTMENTS      | 978    | 662   | 387   | 0   | 0 | 2,027  |
| HAWTHORNE-ALORTON          | 1,217  | 639   | 246   | 50  | 0 | 2,152  |
| HERITAGE MANOR             | 300    | 719   | 419   | 0   | 0 | 1,438  |
| JEFFERSON SQUARE           | 0      | 1,346 | 0     | 0   | 0 | 1,346  |
| LAKEVIEW APARTMENTS        | 508    | 376   | 205   | 0   | 0 | 1,089  |
| PVT MATHISON - CENTREVILLE | 1,183  | 542   | 85    | 54  | 0 | 1,864  |
| RICKERT STATION            | 19     | 0     | 0     | 0   | 0 | 19     |
| SMITHTON                   | 255    | 0     | 339   | 56  | 0 | 650    |
| THOMAS TERRY APARTMENTS    | 841    | 398   | 46    | 27  | 3 | 1,315  |
| WASHINGTON PARK            | 654    | 481   | 0     | 0   | 0 | 1,135  |
| GRAND TOTAL                | 10,174 | 6,783 | 2,192 | 347 | 3 | 19,499 |

SOURCE: St. Clair County Housing Authority

***Describe the unmet housing and service needs of qualifying populations:***

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

Individuals experiencing homeless in the community are in need of more service-enriched affordable housing. Providing access to more safe, decent, affordable housing opportunities with wrap-around, trauma-informed services will allow for a greater number of unsheltered or chronically homeless individuals to receive the critical supports necessary to achieve housing and life stability.

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

Once housing has been secured, there is a need for supportive services such as ongoing case management and transportation to mitigate the risk of becoming homeless again

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

There is a need for supportive services, such as on-going case management. Funding for staff in order to effectively assist individuals with services and on-going case management is also needed. During consultation with the CoC, it was noted that victims fleeing domestic violence often wish to use assistance to relocate outside of the County, adding a potential complication for CoC member organizations and agencies that receive federal funds that earmarked for use within defined geographic boundaries, such as a PJ.

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

In St. Clair County, households of all types (small related, large related, elderly, other) experience housing cost burden. According to the 2013-2018 American Community Survey, in St. Clair County an estimated 41.8% of renter households and 14.8% of owner households face housing cost burden. Housing quality and safety can sometimes become an issue when households do not have the funds to complete necessary home repairs. Further, in St. Clair County, virtually all extremely low-income households (less than 30% AMI), or 19,410 (of 19,415) households, are housing cost burdened or severely housing cost burdened (according to the 2012-2016 CHAS selected data summary for St. Clair County).

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

Local service providers estimate that there are approximately 1,100 to 1,500 homeless individuals in St. Clair County. These local service providers indicate the homeless population continues to grow, and agencies are not able to keep pace. Reasons for the increasing homeless population include job losses from the declining economy and the increase in the cost of living. High inflation has resulted in rapidly increasing household expenses, particularly in the areas of food, rent, fuel, and utilities. The current economy has created over-crowded conditions in existing shelters and a devastating impact on the quality of outreach and assessment services provided by local service providers. The overcrowded conditions in the shelters leave no room for the families that are homeless. While there is a high need for Public Services in St. Clair County, the County does not receive ESG or HOPWA funding and has limited funding eligible to address the collective needs of homeless, non-homeless special needs, and general low-to-moderate income populations.

During consultation with the CoC, it was noted that individuals suffering from mental health issues are often perpetually at risk of losing housing, especially when they are unable to access the necessary level of care and treatment. Additional services that address mental health issues are needed as are services aimed at prevention of housing loss and maintenance of affordable housing. Services need to be coordinated to avoid duplication. Several members expressed interest in using the Housing Navigator tool to help families locate suitable housing opportunities, particularly for those who are seeking to utilize a Housing Choice Voucher. Another issue raised during discussion with the CoC was the difficulty in finding adequate resources to help families move, particularly when moving necessitates a large clean-up effort that requires substantial removal of trash and bulk items that need to be transported to a dump.

***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:***

As is the case in many communities, there is not sufficient housing for renter households at the less than 30% AMI income level. There are 5,155 housing units affordable to renters making less than 30% AMI, but according to HUD CHAS data there are 12,890 renter households at that income level. Renter households at this income level are incredibly difficult to house. It is estimated that a four-person household making 30% of AMI (according to 2020 documentation) can afford monthly rent of approximately \$610, which is below the HOME rents for even an efficiency apartment. Although the data shows that there are technically enough affordable units available for renter households at 30%-50% or 50%-80% AMI, it is likely that some of these units are currently being occupied by households at <30% AMI and that additional affordable units at a variety of price points are needed. Furthermore, even when affordable rental housing is available, it is not uniformly available in all communities, and there may be a lack of affordable rental housing in areas of high opportunity (with access to jobs, services, high quality schools, etc).

Additionally, HUD data shows that there are 6,525 owner households making less than 30% AMI. Although very few – if any – homes would be affordable to these households were they to try and purchase a new home in St. Clair County, it is likely that many of these households have paid off their mortgage and own their home in full (senior citizens living alone are an example of who might fall into this category of homeowners making less than 30% AMI). For these owner households making less than 30% AMI, home repair programs that allow them to perform needed maintenance are critical to ensuring there is sufficient housing available.

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

There is a need for permanent housing with supportive services to meet individual needs of homeless persons and families. This includes housing for homeless persons, including those that are hard-to-serve due to disabilities. There is a profound need for the provision of independent and stable living conditions that address gaps within the current shelter and housing inventory, as well as the service delivery system. The housing and supportive service needs of qualifying populations overlap across populations and are similar to the needs of the low-income population as a whole. All populations would benefit from an increased number of affordable housing units and increased affordability in the housing market. Rising rent and limited availability of units causes increased instability among cost burdened and low-income renters and those at risk of homelessness. Among those experiencing homelessness, the lack of affordable rental units causes a bottleneck in the availability of permanent housing options, creating longer episodes of homelessness and leading to fewer households becoming stably housed overall.

***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:***

At the January 10, 2023 CoC meeting, IGD staff and their consultant facilitated a robust discussion about the level of need and gaps. An analysis of both current past Point-in-Time counts provided information regarding the shortage of shelter and housing inventory.

## 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:***

Based upon the results of IGD's extensive consultation process, and the Needs Assessment and Gaps Analysis, the County is proposing to focus the majority of its HOME-ARP funding on Affordable Rental Housing Development, with a smaller amount of funding that may be ~~to~~ be allocated toward Supportive Services. The opportunity presented by this allocation of HOME-ARP to make the sizable investment to fulfill a long-term solution is vital to strengthening the community's homeless system of care.

IGD will administer the HOME-ARP allocation and oversee all projects to completion. The method and process we intend to use for solicitation and selection of HOME-ARP funded Supportive Services projects is as follows:

- IGD will identify in the solicitation specific Supportive Services that HOME-ARP funding can be used that will address the gaps identified in the Needs Assessment and Gaps Analysis, based on feedback received from the initial public participation and stakeholder engagement, as well as additional public comments we expect to receive in regard to the draft Allocation Plan, (for example, programs that enhance and supplement the existing prevention and diversion programming).
- IGD will publicly announce the projects that were awarded HOME-ARP funding on its website, and via social media.

The method and process we intend to use for solicitation and selection of HOME-ARP funded Affordable Rental Housing Development is as follows:

- IGD will issue a Request for Proposals (RFP) for the development of Affordable Rental Housing.
- Applicants will be provided approximately 30 days to submit their full application for funding.
- If applicants have questions or wish to discuss their plans in advance of submission, IGD will make staff available to answer any questions.
- IGD will be explicit in the solicitation with any other conditions that the County will require in order to receive funding.
- IGD will publicly announce the projects that were awarded HOME-ARP funding on its website.

No portion of the administrative funding was distributed to a contractor or subrecipient prior to HUD's approval of the County's HOME-ARP Allocation Plan.

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

St. Clair County IGD will only administer the administration portion of eligible activities directly. The agencies selected through the RFP process detailed above will move forward with rehabilitation, referral, supportive services and/or selection and housing the individuals and families in the QP's.

***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:** The funding will not be provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

## HOME-ARP Funding Breakdown

|                                                        | 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               | \$ 3,202,646.15        |                      |                 |
| Non-Profit Operating                                   | \$ 0                   | 0 %                  | 0%              |
| Non-Profit Capacity Building                           | \$ 0                   | 0 %                  | 0%              |
| Administration and Planning                            | \$ 565,172.85          | 15 %                 | 15%             |
| <b>Total HOME ARP Allocation</b>                       | <b>\$ 3,767,819.00</b> |                      |                 |

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

During consultation sessions, participants of IGD's consultation process, rated the need for additional Affordable Rental Housing as the being the largest gap within our community, followed by Supportive Services. As IGD completed the HOME-ARP Needs Assessment and Gaps Analysis this top need for additional affordable housing was once again affirmed by an analysis of the available data.

**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:**

Through extensive consultation with the CoC, it was determined that service enriched affordable housing was the best use for the HOME-ARP funds.

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

It is intended that the County's HOME-ARP funds will be used to support the development of an estimated 10-16 units of affordable rental housing for occupancy by qualifying populations (QPs). Development of these units will help address the lack of permanent housing resources. The units will be maintained for occupancy by qualifying populations for a minimum of 15 years.

***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 plan is to create approximately 10-16 additional units of permanent affordable housing with supportive services provided by various agencies.

## **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:***

IGD has given a preference to the Homeless Qualifying Population as defined in 24 CFR 91.5 and Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking Qualifying Population as defined by HUD.

***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:***

The proposed preference identified above will address the unmet need or gap in benefits and services for the two identified qualifying populations by adding housing units and supportive services provided by various agencies~~the housing agency~~ in accordance with needs assessment and gap analysis included in this allocation plan.

## **Referral Methods**

***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):***

N/A

***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):***

N/A

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

N/A

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

N/A

## **Limitations**

***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:***

St. Clair County does not intend to limit eligibility.

***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:***

N/A

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

N/A

## **Refinancing Guidelines**

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

N/A

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

N/A

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

N/A

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

N/A.

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

N/A

- ***Other requirements in the PJ's guidelines, if applicable:***

N/A.