



# Skagit County HOME Consortium

**HOME ARP Plan**  
October 28<sup>th</sup>, 2022

## **Introduction**

The Skagit/Island/Whatcom County HOME Consortium will receive \$3,591,066 in Home Investment Partnership American Rescue Plan (HOME-ARP) funds from the U.S. Department of Housing and Urban Development (HUD). This supplemental funding was allocated by formula under the HOME entitlement program and must primarily benefit individuals and families who are experiencing homelessness, at risk of homelessness, or in other vulnerable populations at greatest risk of housing instability.

This plan includes:

- A summary of the consultation and public participation processes undertaken by the Consortium;
- An assessment of the needs of qualifying populations and gaps in local housing and services systems;
- A Plan for uses of HOME-ARP funds for eligible activities.

## **Consultation**

This HOME-ARP allocation plan was prepared in consultation with a broad group of stakeholders whose constituents includes HOME-ARP qualifying populations. We fielded an electronic survey, and we held 5 virtual consultation sessions. Our Consortium specifically sought consultation with agencies serving qualifying populations, including nonprofit agencies, housing authorities, local governments, continuum of care agencies, and victims supports agencies. A list of organizations consulted is included as Appendix A.

### **Survey Feedback**

We received 14 responses to the online survey. Not all respondents answered every question, but the narrative below summarizes the results and key themes raised.

### **Geographic Area Represented**

- Skagit County -4
- Whatcom - 7
- Island - 2
- All of the above - 1

### **Gaps that should be prioritized**

- There is not enough affordable housing for very low income and/or homeless individuals. People are on waiting lists for years.
- Should prioritize families between 60-80% AMI
- Supportive services are our biggest need and gap (in Whatcom). Rental development is also an enormous gap, but the requirement for 70% of units to serve ARP populations will be challenging for larger developments. I have concerns about TBRA with a time-limited fund source.

- Truly homeless and those fleeing domestic violence and human trafficking
- It would be helpful to have these funds deployed in a way that does not create a large need for ongoing services—either by subsidizing rentals for low-income households or by adding a relatively small number of additional supportive housing units. If supportive housing units are added, some of the funding should go towards an operating reserve.
- Needs: TBRA, non-profit operating and capacity building, and supportive services, acquisition & development of non-congregate shelter
- Acquisition and Development of non-congregate Shelter. i.e. single-room dormitory-style.
- Supportive services that include intensive case management and psychiatric care.
- Priority should be given to Nonprofit Operating & Capacity Building Assistance & Rental housing development, if any development were to come to completion, I would also suggest Supportive Services to the property(s) in increase project success.
- Look for the greatest (population) need.
- I think the biggest gaps are the number of available, affordable rental units, and also supports for families with children who do not screen into housing services because they are not literally homeless, but who are highly vulnerable and need intervention and support to mitigate childhood trauma and improve outcomes so those children in our community are not at risk of becoming our next generation of people experiencing homelessness.
- Not making a family live in their car or on the street before they can access assistance.
- People who can't afford market rate housing but do not qualify for housing assistance
- People experiencing homelessness
- Acquisition & Development of Non Congregate Shelter
- Supportive Services (defined by McKinney-Vento and ESG)
- Rental housing development
- Non-congregate shelter development/acquisition in 1 or 2 small cities of Whatcom County, in collaboration with feasibility work being done.
- Supportive services for families experiencing homelessness.
- Operating/capacity support in conjunction with any of the above projects.

### **Needs that should be prioritized**

- Affordable housing and low or no income small group housing.
- Construction of new housing.
- Actual housing (physical buildings), we can issue vouchers all day but the lack of rentals is very troubling in Island County.
- Emergency shelter for families with children, long-term affordability for low-income households, supportive services for people with history of chronic homelessness, other specialty shelters for individuals not well served by large congregate facilities.
- Immediately available shelter
- Safe migrant worker housing
- Intensive case management
- Coordinated medical and psychiatric care. General immediate medical care and coordination
- I would suggest prioritizing a blend of People experiencing Homelessness and other groups experiencing housing instability.

- People experiencing homelessness, families at risk of homelessness. Fleeing DV I feel like is a priority, but also already included in both of those groups/definitions.
- Support services so individuals don't have homelessness as a cycle they fall back into.
- Affordable rental housing development. Use the minimum wage at 30 hours per week as the standard for what makes housing affordable. Most people earning minimum wage are not full time because those jobs are deliberately part time so that employers have no responsibility for paying benefits. No one should need to work multiple jobs just to afford housing.
- Acquisition & Development of Non Congregate Shelter
- Helping the high number of homeless families with children get sheltered, stabilized, housing ready, and permanently housed.

**Do you think our HOME Consortium should prioritize one of the qualifying populations or subgroups within them ahead of others? If yes, which one(s) and why?**

**67% No**

**33% Yes**

### **Ranking Uses of ARPA funds**

The survey asked respondents to rank the possible uses of funds. The highest ranking use was affordable housing development and lowest ranking was non-congregate shelter. The survey included an opportunity for respondents to explain their choices.

Under affordable housing development, comments included:

- We are sorely lacking in affordable rentals;
- Ultimately, more affordable rental units is really what is going to impact the community the most and help us get upstream of the problem, rather than continuing to spend money to fund short-term band-aid solutions.

Another two respondents noted that all of the areas of funding were needed.

### **Feedback provided in Consultation Sessions or 1x1 meetings**

The most consistent theme shared during the consultation session was the shortage of affordable rental housing units. Attendees sometimes referenced low rental vacancy rates or challenges finding housing for the clients they serve.

Attendees also referenced that services funding is needed to support homeless and at-risk populations. Several subpopulations of need were referenced:

- Seniors
- Families with Children
- Farmworkers
- DV and sex trafficking victims (can have different needs and outreach)
- People living in mobile homes

Other feedback received:

- We should consider a focus on prevention and that we have some local diversion programs that have good results.
- We should act with urgency and support immediate needs in the community—the era of tents and RV housing needs to come to an end.
- The pandemic has negatively impacted many nonprofits, this could be an opportunity to address some of the gaps in capacity that have resulted (through operating and capacity building)
- Rehabilitation and predevelopment funds are needed.

### **Public Participation/Hearing**

The Consortium held a public comment period on its draft HOME-ARP plan/2021 Substantial Action Plan Amendment. The comment period began on September 1, 2022 and closed on September 29, 2022.

The Consortium held a public hearing on September 19, 2022 at 1:00 p.m. in the Skagit County Commissioners Hearing Room to receive feedback on the plan. The public hearing was advertised twice in the Skagit Valley Herald, on September 1<sup>st</sup> and September 8<sup>th</sup> in both English and Spanish, and the advertisement included detailed information about accommodations for people with disabilities and special needs. The draft plan was posted on the Skagit County Public Health website on September 1<sup>st</sup> 2022. Notification of the public hearing and an invitation to provide feedback was distributed to all Consortium members and via an email listserve that has 3,900+ subscribers.

The Consortium did not receive any written feedback on the plan outside of its initial consultation period, and no one attended the public hearing.

In terms of broadening public participation, our Consortium provided flexible ways for people to provide feedback. During the consultation process we held online meetings, used an electronic survey, and met with people 1x1 and accepted email feedback for people who could not attend the session. For the public hearing, our public hearing was available in person and online, and we accepted feedback through email, written correspondence and phone calls.

### **Needs Assessments and Gaps Analysis**

HOME-ARP funds must be used to primarily benefit individuals or families that are:

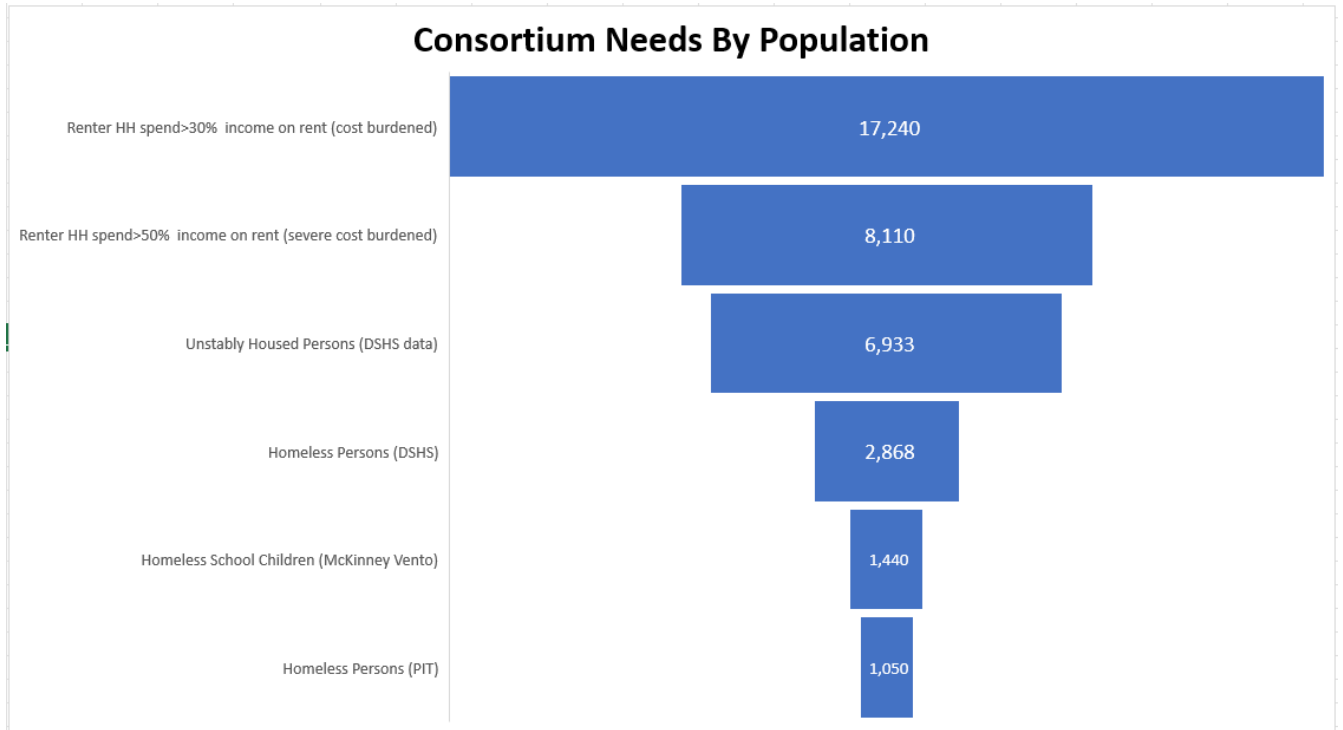
- Homeless (Section 103 or McKinney-Vento definition)
- At risk of homelessness
- Fleeing domestic violence, human trafficking
- Other groups experiencing housing instability
- Veterans meeting these criteria

A complicating factor to understanding the true picture of homelessness is that there is no single definition of homelessness in the United States and as a result there are varying numbers of homelessness reported. For HOME-ARP, the definition of homelessness does not mean someone has to literally be living outside. The definition of homelessness includes people who lack a fixed, regular, and adequate nighttime residence; who are sleeping in places not designed for human habitation (ex. cars, parks, abandoned buildings, camp grounds; people in other temporary living arrangements, including hotels and motels paid for by government programs or nonprofits); people living in shelters; people who

will imminently lose their housing, have a 14-day eviction notice or would otherwise lose their housing within 14 days.

### Size and Composition of Qualifying Populations

The table below shows a range of need estimates based on different data sources and definitions of need.



### Unstably Housed/At Risk of Homelessness

According to HUD Comprehensive Housing Affordability Strategy (CHAS) data, 17,240 renter households in the three County Consortium (not including Bellingham) spend more than 30% of their gross monthly income on their rent. A total of 8,110 households spend more than 50% of their income on rent. Another estimate for unstably housed comes from Washington State DSHS estimates that compiles data from 4 client database systems. That system identifies 6,933 unstably housed people (individuals, not households) in the region. The average household size in our region is 2.5 people, so it is possible to translate estimates between individual and household estimates.

Overall, no matter which data source you examine, there are many thousands of individuals and households that are unstably housed in our region.

### Homelessness Estimates

Each year, Continuums of Care (CoCs) are required by HUD to conduct a count of who is experiencing homelessness. 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 Point-in-Time (PIT) count identifies the number of people who were homeless on that 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. In total, the 2020 PIT count identified 1,050 sheltered and unsheltered people in 2020. We chose to reference 2020 PIT data because an unsheltered count was not conducted in 2021 due to the Coronavirus Pandemic. Data from the 2022 count is not yet complete. Another reference point for homelessness is DSHS data, which showed that there are 2,868 homeless individuals in the Consortium Area.

Because the HOME-ARP definition of homelessness is quite broad, the PIT and DSHS estimates are likely a significant undercount, because they do not include people that will lose their housing within 14 days or who lack a fixed, regular, and adequate nighttime residence (often called “couch surfing”).

One more way to estimate the number of homeless people in the Consortium region is to look at school district data for homeless students. An advantage of this data is that school districts use the McKinney-Vento definition of homelessness, which matches up to the HOME-ARP definition. A disadvantage of the data is that it only includes the student, and not any adult household members. The table below shows that the most recent school district identified 1,440 homeless students in the Consortium area (including Bellingham).

<b>2021 Homeless Student Data (McKinney-Vento)</b>	<b>Total</b>
Coupeville School District	54
Oak Harbor School District	173
South Whidbey School District	85
<b>Island County Total</b>	<b>312</b>
Anacortes School District	46
Burlington-Edison School District	110
Concrete School District	14
Conway School District	9
ESD 189 acting as a school district	0
La Conner School District	25
Mount Vernon School District	143
Sedro-Woolley School District	205
<b>Skagit County Total</b>	<b>552</b>
Bellingham School District	283
Blaine School District	34
Ferndale School District	58
Lummi Tribal Agency	0
Lynden School District	34
Meridian School District	26
Mount Baker School District	86
Nooksack Valley School District	55
<b>Whatcom County Total</b>	<b>576</b>
<b>Total for Three Counties</b>	<b>1,440</b>

## **Fleeing, or attempting to flee Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking**

It is similarly challenging to identify a firm estimate of the number of people that are currently fleeing, or attempting to flee Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking. Many of the data sources referenced earlier, including the school district McKinney Vento statistics, and DSHS data do not track domestic violence statistics. And as previously referenced the PIT Count is not a complete estimate either. Compounding this challenge is the fact that an estimated 50% of DV victims do not report their perpetrators' crimes to the police. Setting these data limitations aside, we do know that:

- According to the National Intimate Partner and Sexual Violence Survey, an estimated 32% of women will be victims of physical violence, and 16% will be victims of sexual violence in their lifetimes;
- National estimates are that roughly 80% of homeless mothers with children have previously experienced domestic violence.
- Households headed by a female and with children are at higher risk of experiencing domestic violence
- Using PIT count data alone, we would estimate that 200 individuals in the Consortium region that are currently homeless have experienced domestic violence.
- The PIT count is likely a significant undercount of need—in 2020 DVSAS fielded 930 calls for assistance from people experiencing domestic violence.

### **Populations at Greatest Risk of Housing Instability**

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability (e.g., moving two or more times during the last 60 days due to economic reasons). The table below shows that there are 7,025 households below 30% AMI, but only 4,520 units affordable at that level, implying a gap of 2,505 units. Furthermore, there are 5,155 renter households that earn <30% AMI and have one or more severe housing problems.

<b>Total Consortium Area (does not include Bellingham)</b>	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
Total Rental Units	38,815		
Rental Units Affordable to HH at 30% AMI (At risk of Homelessness)	4,520	7,025	2,505
Rental units affordable to HH at 30-50% AMI	4,845	6,140	1,295
0-30% AMI Renter HH with 1/ or more severe housing problems (at risk of homelessness)		5,155	
30-50% AMI renter HH w/1 or more sever housing problems (other populations		5,105	



### Gaps within the current shelter, housing, and service delivery systems

The following table identifies beds and units available in the homelessness system. The summary is for the three county region, and includes properties within the City of Bellingham.

Type of housing (from HIC)	Household w/Child		Child Only		Adults only		Total Beds	Total Units
	Beds	Units	Beds	Units	Beds	Units		
Emergency Shelter	534	156	18	11	608	260	1160	427
Transitional Housing	273	97	-	-	86	73	359	170
Rapid Rehousing	593	206	-	-	261	260	854	466
Permanent Supportive Housing	120	38	-	-	436	414	556	452
<b>Totals</b>	<b>1520</b>	<b>497</b>	<b>18</b>	<b>11</b>	<b>1391</b>	<b>1007</b>	<b>2929</b>	<b>1515</b>

### Gaps for Shelter

As the table below shows, there is more need for shelter than current number of beds. Even just accounting for children and not adults—there are 1,440 homeless students and only 534 beds of shelter for households with children. Similarly, the DSHS estimate is 2,868 homeless persons, while our region only has 1,160 beds of shelter. It is important to note that many of these beds are mats in shared congregate shelter spaces.

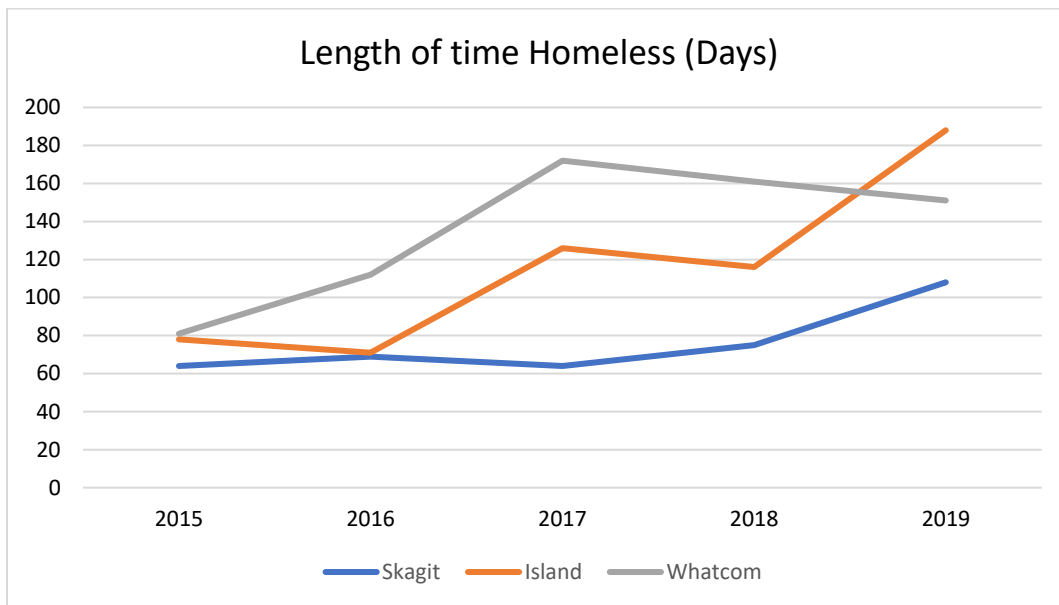
Shelter Available			Need Estimates		
Type of housing	Total Beds	Total Units	PIT estimate homeless	DSHS estimate Homeless Persons	Homeless students
Emergency Shelter total	1160	427	1050	2,868	
Emergency Shelter (available for households with children)	534	156			1,440

For many years our region has recognized that there is a need for additional low-barrier shelter. One of the biggest challenges in planning shelter needs regionally is that capacity depends on the amount of time it takes to obtain housing for those who enter shelter. If there are transitional or permanent housing resources available, those who enter shelter are quickly connected to housing and fewer emergency shelter beds are needed on an ongoing basis. However, our shelter providers can experience bottlenecks as there is not affordable housing for shelter residents to move into.

### Gaps for Transitional and Affordable Housing

In addition to shelter needs, there are significant gaps for transitional or permanent housing. According to data from the Washington State Homeless System Performance Report Cards, people accessing our housing systems are spending more than 100 days homeless, and many are not able to successfully exit to permanent supportive housing. Unfortunately the length of time homeless has been increasing for all three counties over the last several years.

	Total Entries	Length of time homeless	Exits to Permanent Housing
Skagit County	1,260	108	43%
Island County	806	188	80%
Whatcom County	1,901	151	61%



### Domestic Violence Service Capacity

Our Consortium Region has several programs and providers that serve people fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking. They include shelter, rapid rehousing, transitional housing, and prevention services. A major challenge for these programs is availability of permanent housing supply.

	2021
Households served during year	224
Households exited from programs	198
Households exited to temporary housing	110 (56%)
Households exited to Permanent Housing	57 (29%)

Source: WA State Commerce 2021 Golden Report

### Gaps for Other Populations

For other populations at greatest risk of housing stability, there is a gap of thousands of affordable units, as evidenced by the table below. There are an estimated 5,155 renter households that earn <30% AMI and have one or more severe housing problems, which would qualify them for the “at risk of homelessness” category of housing.

<b>Total Consortium Area (does not include Bellingham)</b>	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
Total Rental Units	38,815		
Rental Units Affordable to HH at 30% AMI (At risk of Homelessness)	4,520	7,025	2,505
Rental units affordable to HH at 30-50% AMI	4,845	6,140	1,295

**Information from Consortium 5 Year Plans**

Each county within the HOME Consortium submitted 5 Year Homeless Housing Plans to the State Department of Commerce, and provide annual updates on the plans. The plans provide valuable insight into the needs and gaps in each community. Highlights from those plans are included below:

**Island County**

- Limited Capacity in all types of housing stock and with Housing Providers’ capacity to scale services to meet the need
- Deficient amount of funding and funding restrictions
- Lack of cross system collaboration

More specific gaps were identified within the Homeless Crisis Response System:

- Housing and services for homeless individuals entering the community from jails, correctional facilities, foster care, hospital, treatment facilities, mental institutions, and those who are chronically unsheltered
- Low Barrier/Housing First-Harm Reduction Housing (for chronically unsheltered and other high-needs populations)
- Integration of planning across systems serving homeless populations
- Support for those struggling with addictions
- Need Units/beds of Medical Respite Care to provide medical oversight for sick and injured homeless individuals.
- Additional units of affordable housing when homeless households are ready to reenter mainstream.
- Need to continue to improve case management and coordination between housing providers and other systems of care to meet needs of the most vulnerable
- Transportation when Island Transit not available
- Regulations not supporting certain types of housing
- Emergency shelter with shower, laundry and acceptance of pets

**Skagit County**

System Gaps & Opportunities:

- Transportation: There is a significant lack of transportation options for people without access to a personal vehicle in Skagit County.
- Childcare: Free or low-cost childcare is a scarce resource in Skagit County.

- Medical and behavioral health services: Regular health care becomes especially difficult to access without a stable living environment.
- Day services/drop-in centers: Drop-in service centers that offer basic human dignities, such as restroom, shower, laundry and storage access for people experiencing homelessness are virtually nonexistent in Skagit County.
- Emergency Night-by-Night Shelter: As noted earlier, a low-barrier nightly shelter would greatly impact the safety and dignity of people experiencing homelessness in our community (since the report was published a Pallet/tiny cabin shelter was created)
- Permanent Supportive Housing: PSH projects are one of the most effective and beneficial services for the most vulnerable people experiencing homelessness in our community.

### **Whatcom County Strategic Plan to End Homelessness**

#### Community Challenges Identified:

- Affordability and Availability of Housing Units: planners have estimated the need for an additional 11,000 affordable housing units
- Population Growth: in the five years following 2013, the population of Whatcom County grew by 19,578 people, but housing units only increased by 5,457 units
- Health Services for Housing Stability: Although mental illness and substance abuse rates have remained relatively steady and are not the leading causes of homelessness, a shortage of treatment options for those struggling with substance use disorder and/or poor mental health is an enormous challenge for people experiencing homelessness.

#### Seven Evidence-Based Strategies were included in the plan:

1. Centralized Point of Entry
2. Rapid Re-Housing
3. Permanent Supportive Housing
4. Increase the Supply of Affordable Housing
5. Homelessness Prevention and Diversion
6. Interim Housing (Both emergency shelters and transitional housing)
7. Economic Security (Income, employment, and financial stability)

### **Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:**

The HOME-ARP notice defines “other populations” as populations who do not meet the criteria as established in the previous populations (homeless individuals, individuals at-risk of homelessness, individuals fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking) as such:

- (1) Other Families Requiring Services or Housing Assistance to Prevent Homelessness is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance,

including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

(2) At Greatest Risk of Housing Instability is defined as household who meets either paragraph (i) or (ii) below:

(i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);

(ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:

For the purposes of this allocation plan, this PJ will consider “other populations” households at greatest risk of housing instability (meaning households in the community making less than or equal to 50% AMI and still rent burdened).

**Identify priority needs for qualifying populations:**

Skagit and Island Counties plans to prioritize the creation of new units of affordable housing opportunities for qualified populations where possible. Whatcom County plans to prioritize the creation of new units of non-congregate shelter.

**Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:**

The level of need and gaps have been determined through consultation with local service providers, local area data, reports, and studies referenced in the previous section. The data and reports highlight that the most pressing need in our community is the production of additional units of affordable housing, including shelter.

**Plan for Use of HOME ARP Funds**

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

The Consortium plans to select affordable housing and shelter projects through a competitive funding opportunity (NOFA) process similar to how it has historically selected projects. For affordable rental housing projects, the Consortium plans to use the State Combined Funders application, which includes information about the project, population served and financial information. For shelter project applications, the Consortium will develop a similar NOFA process. Applications are reviewed and scored by the Skagit County HOME Consortium Executive Advisory Committee.

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

No, the PJ will not administer 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 have been provided to a subrecipient or contractor prior to HUD's acceptance of the HOME ARP allocation plan.

**Use of HOME ARP Funding**

	<b>Funding Amount</b>	<b>Percent of Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$0	0	
Acquisition & Development of Non Congregate Shelters (Whatcom County)	\$1,051,716.64	29%	
Development of Affordable Rental Housing (Island County)	\$710,157.26	20%	
Tenant Based Rental Assistance (TBRA)	\$0	0%	
Development of Affordable Rental Housing (Skagit County)	\$1,541,906.81	43%	
Non-profit Operating	\$0	\$0	5%
Non-Profit Capacity Building	\$0	\$0	5%
Admin & Planning	\$287,285.28	8%	15%
<b>Total</b>	<b>\$3,591,066 .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:***

As the table above illustrates, the Consortium plans to allocate its funding to the development of affordable rental housing development and acquisition and development of non-congregate shelters. To maintain geographic equity, the plan allocates HOME ARP funding using geographic targets by participating county. The allocation percentages are in line with the HOME ARP allocation formula used by HUD.

Although HUD would allow the Consortium to take a 15% admin rate, the PJ believes that the program can be administered at an 8% admin rate. If projects are delayed or are more complex than anticipated, it is possible that the Consortium may need to amend this plan to take a larger admin expense to complete the projects.

***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:***

The needs assessment referenced earlier in this plan identified needs in all of the HOME ARP spending categories. However, additional housing capacity for both shelter and affordable housing surfaced as the highest needs which is why those two categories have been selected for funding.

### **HOME-ARP Production Housing Goal**

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

Because projects have yet to be selected through a NOFA process, it is difficult to estimate the precise number of units that will be created. Using the HOME maximum per unit subsidy as a guide, with \$3.2 million in development subsidy, we estimate that approximately 20 new units of housing could be created using HOME ARP funding.

***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 estimated 20 new units would address the priority needs of adding affordable housing and shelter capacity in the Consortium region.

### **Preference and Prioritization**

**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:**

This allocation plan notes that the Consortium plans to allocate its funding to development of affordable housing and acquisition and development of non-congregate shelter. These projects could potentially serve all qualifying populations for HOME ARP. The Consortium will follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).

In scoring applications, in alignment with the Washington State Housing Trust Fund, the Consortium plans to continue its practice of giving preference/priority points for projects that serve high need populations, including households with very-low-and-low-incomes, homeless persons, and other target populations that align with a local priority or need.

Specifically, a NOFA selection process would include:

- Higher scoring for projects that are dedicated to extremely low (<30% AMI) and low-income (<50% AMI) residents. The highest scores would be available to projects that set aside a higher percentage of units for these low and very-low-income groups.
- Higher scoring for projects where more units are targeted to “literally” homeless households at entry following the HUD definition
- Higher scoring for projects that serve high-priority populations, including homeless households, or other target populations that align with a local need. For scoring the “other target populations” applicants would be asked to provide information describing the target population and would be scored for alignment with a local priority and need.

It is possible that development projects, including shelters will be designed to serve specific qualifying populations. For example, shelter projects would prioritize homeless populations instead of serving unstably housed people that do not need shelter. It is possible that development projects, including shelters will be designed to serve specific qualifying populations. For example, shelter projects would prioritize homeless populations instead of serving unstably housed people that do not need shelter.

***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:***

By aligning its project scoring with the Washington State Housing Trust Fund to prioritize high need populations, the Consortium increases the chances that its development projects will be able to secure the funding leverage needed to move forward. With limited resource available, leveraging state and other funding will maximize the impact of the HOME ARP funds and the number of new units that are ultimately created. Prioritizing high needs populations is also consistent with local housing plans and reports that were referenced earlier in this action plan.

#### **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):***

There are three different Coordinated Entry (CE) systems in the Consortium region (Whatcom, Island, Skagit). Because none of the CE systems serve all of the qualifying populations for HOME ARP, the Consortium will not be able to use CE systems for referral to HOME ARP-funded projects. Instead, each project will develop its own referral methods and lists. Consistent with the practice of our CE system, and in alignment with housing best practices and fair housing law and regulations, we would expect projects will prioritize entry to services based on vulnerability. Each county already uses a vulnerability assessment to serve the highest need members of our community first. The Consortium expects that priority would be given to higher need populations, including households with incomes at or below 30% AMI, projects that serve persons with special needs, including persons with disabilities and homeless persons and farmworkers.

***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):***

#### **Not Applicable**

***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):***



**Not Applicable**

*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):*

**Not Applicable**

**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 Consortium does not intend to implement any limitations at this time. It is possible that development projects, including shelters may be designed to serve specific qualifying populations. For example, shelter projects may prioritize homeless populations ahead of serving unstably housed people.

*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:*

**Not Applicable**

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

**Not Applicable**

**HOME-ARP Refinancing Guidelines**

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

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

**The Consortium does not intend to use HOME ARP to refinance existing debt.**

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

**Not Applicable**

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

**Not Applicable**

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

**Not Applicable**

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

**Not Applicable**

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

**Not Applicable**

## Appendix A. List of Agencies Specifically Consulted

Agency/Org Consulted	Type of Agency/Org	Method of Consultation
Skagit DVSA	DV Services providers, homeless service provider	1x1 meeting
Beacon Development Group	Affordable Housing Development Consultant	Meeting/Information Session
Washington State office of Public Defense	Public agency that addresses needs of QP (all)	Meeting/Information Session
Volunteers of America	Private agency that addresses needs of QP (all); veteran service organization;	Meeting/Information Session
Community Action of Skagit County	Private agency that addresses needs of QP (all); veteran service organization; homeless service provider	Meeting/Information Session, Online Survey
City of Anacortes	Public Agency that address the needs of the QP (all)	Meeting/Information Session
Skagit Goodwill Job Training & Education Center	Private organization that address fair housing, civil rights, and needs of people with disabilities	Meeting/Information Session
Whatcom County Health Department	CoC serving the jurisdiction	Meeting/Information Session, Online Survey
Opportunity Council	Private agency that addresses needs of QP (all); homeless service provider	Meeting/Information Session, Online Survey
Housing Authority of Skagit County	PHA	1x1 meeting
Family Promise	Homeless service provider, Private agency that addresses needs of QP (all)	Meeting/Information Session
Whatcom County Housing Advisory Committee	PHA,; CoC serving the jurisdiction, DV Service providers, Homeless Service Providers	Meeting/Information Session
Anacortes Housing Authority	PHA	Online Survey
Bellingham & Whatcom Housing Authority	PHA	Online Survey, meeting/information session
City of Sedro-Woolley	City, governing entity of contracted PHA (operated by KCHA)	Online Survey
City of Burlington	City	e-mail feedback
City of Bellingham	Public agency that addresses need of QP (all)	Online Survey
YWCA of Bellingham	Homeless Service Provider	Online Survey
Lydia's Place	Homeless Service Provider	Online Survey

Skagit County Public Health	CoC serving the jurisdiction, Public agency that addresses need of QP (all), veteran service provider	Meeting/Information Session/1x1 meeting
Sedro Woolley School District	Public agency that addresses need of QP (school age)	Online Survey
Brigid Collins Family Support Center	Private organization that address fair housing, civil rights, and needs of people with disabilities	Online Survey
Skagit County Legal Aid	Private organization that address fair housing, civil rights, and needs of people with disabilities	Meeting/Information Session
Island County Human Services	CoC serving the jurisdiction; public agency that address needs of the QP (all)	Meeting/Information Session
Island County Housing Authority	PHA	Online Survey