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**Greater Attleboro/Taunton HOME Consortium (GATHC)
HOME Investment Partnerships Program (HOME
HOME-ARP Allocation Plan**

**Public Hearing – December 19, 2022 at 5pm
Taunton City Hall, Municipal Chambers**

**Fifteen Day Public Comment Period
December 6, 2022 to December 21, 2022**

The City of Taunton, lead city for the Greater Attleboro/Taunton HOME Consortium (GATHC), has issued the draft FY2021 HOME-ARP Allocation Plan on the Consortium's anticipated use of HOME-ARP funds. The Consortium includes the communities of Attleboro, Berkley, Carver, Dighton, Freetown, Lakeville, Mansfield, Middleboro, North Attleboro, Norton, Plainville, Raynham, Seekonk and Taunton have been awarded \$2,611,979 of HOME-ARP funds.

A Public Hearing has been scheduled for December 19, 2022, at 5:00 PM at Taunton City Hall, Municipal Council Chambers, 15 Summer Street, Taunton MA. The purpose of the hearing is to review and take public comment on the draft Allocation Plan.

HOME-ARP funds may be used benefit qualifying populations through:

1. Tenant-based Rental Assistance (TBRA);
2. Development and support of affordable housing;
3. Provision of supportive services;
4. Acquisition and development of non-congregate shelter;
5. Nonprofit capacity building and operating assistance; and
6. Funds for the planning and administration of the HOME-ARP Program.

For the purposes of HOME-ARP, the American Rescue Plan Act (ARP) defines qualifying individuals or families, including Veterans that are:

1. Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act;
2. At risk of homelessness, as defined in section 401 of the McKinney-Vento Homeless Assistance Act;
3. Fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking (as defined by HUD in 24 CFR 5.2003) or human trafficking (as outlined in the Trafficking Victims Protection Act of 2000 as amended [22 USC 7102]); and

4. Part of other populations, where providing supportive services or assistance under section 212(a) of the National Affordable Housing Act 42 USC 12472(a) would: a. Prevent a family's homelessness; b. Serve those with the greatest risk of housing instability.

The draft FY2021 HOME-ARP Allocation Plan is available for a fifteen-day public comment period starting on December 6, 2022. Comments should be submitted to the Office of Economic and Community Development at 15 Summer Street, Taunton, MA 02780: in person by appointment, by mail, email at oced@taunton-ma.gov, hand delivery or by calling until 4:00 p.m. EST on December 21, 2022. The FY2021 HOME-ARP Allocation Plan will be submitted to HUD after a review of public comments, on or about December 23, 2022. For further information, please contact William Roth, Jr., Executive Director, Office of Economic and Community Development, at (508) 821-1030.

The draft plan can be viewed at the following:

- **Office of Economic and Community Development** - 15 Summer Street, 3rd Floor, Taunton, MA
- **Taunton City Clerk's Office** - 15 Summer Street, 1st Floor, Taunton, MA
- **City of Taunton Website:** <https://www.taunton-ma.gov/188/Economic-Community-Development>

Persons requesting accessibility or translation services for this document are asked to call the City of Taunton, Office of Economic and Community Development at 508-821-1030 by December 12, 2022.

HOME-ARP Allocation Plan Template

Guidance

- To receive its HOME-ARP allocation, a PJ must:
 - Engage in consultation with at least the required organizations;
 - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further Fair Housing;
 - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - Anti-Lobbying;
 - Authority of Jurisdiction;
 - Section 3; and,
 - HOME-ARP specific certification.

Participating Jurisdiction: Taunton, MA (lead), Attleboro, Berkley, Carver, Dighton, Freetown, Lakeville, Mansfield, Middleboro, North Attleboro, Norton, Plainville, Raynham, Seekonk **Date:** 12/1/2022

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

Groups active in areas that use or could potentially use HOME-ARP funds were notified of the development of the HOME-ARP Allocation Plan and encouraged to participate in public meetings. OECD also conducted consultation meetings with stakeholders for input including: Continuum of Care organizations (CoC's), homeless and elderly advocates, human service agencies, veteran advocates and Public Housing Authorities (PHA's). Those activities, in conjunction with public hearings, were conducted to provide a forum for the public to learn about the HOME-ARP Program, to ask questions, and to provide input on how the awarded HOME-ARP funds should be spent. Official notices of the public hearings were advertised in local community newspapers. Local agencies who deal with specific housing related issues were also invited to attend and participate in this process.

At the December 17, 2021 meeting of the Greater Bristol County Attleboro Taunton Coalition to end Homelessness (GBCATCH), Janine Peccini of OECD announced the availability of \$2.6 million in HOME ARPA funding for the GATHC. She explained the eligible populations and the need for the GATHC to determine which group(s) will be focused on. This meeting had 21 attendees from organizations including Community Counseling of Bristol County, Manet Community Health Center, Tufts Health, Catholic Social Services, Our Daily Bread, Congressional and state representative offices, and various other housing and social service organizations.

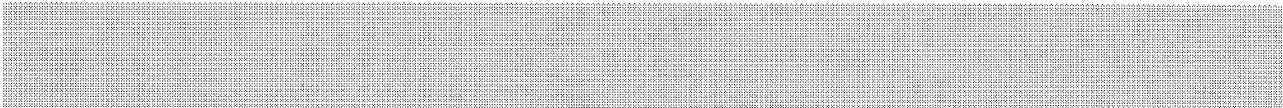
On January 25, 2022, a publicly posted outreach meeting was held by the GATHC for comment on both the PY2022 HOME Program and the PY2021 HOME-ARP. This meeting had 8 attendees including organizations such as New Hope, NeighborWorks, Catholic Social Services, and the South Coast Coalition to End Homelessness.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<i>Greater Attleboro/Taunton HOME Consortium (GATHC)</i>	<i>Regional Organization Civic Leaders</i>	<i>Zoom Meeting</i>	<i>Need for affordable and permanent supportive housing for homeless and near homeless</i>
<i>Greater Bristol County/Attleboro/Taunton Coalition to End Homelessness CoC</i>	<i>Services-homeless Regional organization</i>	<i>Zoom Meeting</i>	<i>Need for affordable and permanent supportive housing for homeless and near homeless. Also additional supportive services.</i>
<i>Father Bill's & Mainspring</i>	<i>Housing Services-homeless</i>	<i>Phone Consultation</i>	<i>Need for affordable and permanent supportive housing for homeless and near homeless. Also additional supportive services.</i>

Housing Authorities in the Consortium	PHA	Phone Consultation	Need for additional affordable housing, primarily rental units.
Veteran Service Organizations	Services - Housing Services-homeless	Phone Consultation	Need for additional housing and human services. Specifically addressing mental health services.
Community Counseling of Bristol County	Housing and Health Services-Children Elderly, Persons with Disabilities Persons with HIV/AIDS Services-Health	Zoom Meeting	Need for new affordable housing especially for elderly. Need for permanent supportive housing for homeless and near homeless. Also additional supportive services.
City of Taunton - Human Services	Services-Elderly Persons	Phone Consultation	Affordable housing and additional services for elderly in Taunton.
New Hope	Services-Victims of Domestic and Dating Violence	Zoom Meeting	Need for additional emergency housing/shelter and services for victims of domestic violence. Needs are for families as well as woman and men.

If additional space is needed, insert image of table here:



Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive,
- The range of activities the PJ may undertake.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- ***Public comment period: start date - 1/25/2022 end date - 2/10/2022***
- ***Public hearing: 1/25/2022***

The City of Taunton's approach to Citizen Participation was to build upon its extensive process used to create prior plans. Groups active in areas that could use resources were notified of the development of the HOME-ARP Allocation Plan and were invited to submit suggestions, ideas and requests for support.

Two public hearings were conducted to provide a forum for the public to learn about the HOME-ARP Program, to ask questions, and to provide input on how funds should be spent. Official notices of the public hearings were advertised in two local community newspapers, posted on the City of Taunton website, and at the OECD office. Consortium members were also asked to post public hearing notices. Local agencies who deal with specific housing related issues were also invited to attend and participate in this process. During the public meetings and prior to the plan being issued, the City received comments which are summarized in the Citizen Participation section of this report and appear in the appendix.

Describe any efforts to broaden public participation:

The Public Hearing was combined with a regular meeting of the GATHC in order to ensure all towns in PJ had advance notice and the opportunity to attend, ask questions, provide feedback, and extend the announcement to their residents.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

As a result of outreach efforts with human service organizations, homeless advocacy groups, housing providers, and the general public, it was determined that overall priorities that should be considered by the Consortium for HOME ARP funds should include: **more affordable rental housing and affordable housing that provides supportive services for homeless and near homeless individuals and families.**

These organizations stated that homelessness and near homelessness is an issue especially with elderly, veterans, families, young people, substance abusers, and the LBGTQ population. It was stated that veterans and families have some additional resources available to them that the other populations do not qualify for.

Comments from the public outreach meetings also concluded: The elderly population is growing and they are affected frequently because of housing costs and maintenance expenses. Also, the high cost of housing, while not the only reason, is seen as the major cause of homelessness.

There were questions regarding the limitations of funding types of projects, such as homeless and Domestic Violence Shelters.

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

All input was considered in the development of this ARP Allocation Plan and priorities were established that would best serve the population as indicated during the public outreach sessions. However, the GATHC has continued to take comments, suggestions and further discussions with human service agencies and other concerned entities up until the publication of this report.

Some specific comments and ideas that have been received in regards to the HOME ARP funding have included providing funding for those delinquent in their rent or mortgage payments, and for programs that would be similar to TBRA. These types of programs were considered but determined to be infeasible with the use of ARP funding. TBRA programs would be allowable under the regulations, however, the Consortium believes that the benefit provided would be limited to only a few clients; and further that it would place a high burden of fiscal management and oversight that the Consortium does not have the capacity to provide. Similarly, any program which would provide individual households with payments to assist with rent or mortgage delinquency would only benefit a few. The consortium would prefer to use the available ARP funding to create new housing units that can provide long term benefit to the Consortium region and constituents.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ

should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	223	50	18	#	0								
Transitional Housing	30	10	12	#	0								
Permanent Supportive Housing	24	7	50	#	33								
Other Permanent Housing						#	#	#	#				
Sheltered Homeless						58	29	1	8				
Unsheltered Homeless						0	28	1	0				
Current Gap										84	9	23	#

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

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	#		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	#		
Rental Units Affordable to HH at 50% AMI (Other Populations)	#		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		#	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		#	
Current Gaps			

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

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

According to the 2022 Point-in Time (PIT) for MA-519 Attleboro, Taunton/Bristol County CoC, there are approximately 250 homeless persons comprising about 115 households. More than half of the homeless households have at least one child. Of those households with children, 49 are in emergency shelters while only 9 are in transitional housing. Children under 18 make up 46% of the total homeless population. 23% of homeless persons in this CoC are Hispanic/Latino. The percentage of Hispanic/Latino homeless in emergency shelters (81%) is noticeably higher than Non-Hispanic/Latino, which is only 73%.

The consortium's at-risk of homelessness population is very difficult to assess. This is because the Consortium is made up of 14 communities that range from rural towns with populations of just over 6,000 residents to the two City's, Taunton and Attleboro, with populations of 59,600 and 46,580 respectively.

Massachusetts has distributed over \$411 million dollars in rental assistance to more than 55,000 households since March 2020. The poverty rate in the two City's in the Consortium; Taunton, and Attleboro are 13.9% and 9.2% respectively. The poverty rate for all of Massachusetts is 11.1%, meaning the two Consortium cities average is higher than average percentage of residents below the poverty line when compared to the rest of the state.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness;***
and,
- ***Those at greatest risk of housing instability or in unstable housing situations:***

The unsheltered population through our Continuum has doubled over the past 2 years. The unmet need for our homeless population is the lack of shelter beds and permanent supportive housing units. Therefore, there is a need for additional emergency shelter capabilities but more so the issue is the bottleneck of housing. Housing costs have risen and the number of low income units do not currently meet the needs of the community. This creates a bottleneck for the shelter; in that those currently in emergency shelter are unable to secure affordable, safe and sanitary permanent housing. Low and moderate income households are at significant risk of a housing crisis as the cost of rental units continues to rise.

Other Families Requiring Services or Housing Assistance or to Prevent Homelessness & Those at Greatest Risk of Housing Instability or in Unstable Housing Situation: Many Consortium residents have experienced the rising cost of rent and are paying more than they can afford for housing. Therefore, many of Consortium residents are only a paycheck away from being homeless.

All of the above qualifying populations need to have supportive services to decrease their risk of housing instability. The populations have substance abuse, mental health issues and lack basic life skills. Without long term housing assistance and supportive services, many households will not be able to obtain and sustain their housing. Supportive services needed consist of case management, child care, education services, employment assistance, food, legal services, housing services, life skills, mental health services, outpatient health services, outreach services, substance abuse treatment services and transportation.

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

The use of Emergency Housing Vouchers has helped to open up supportive housing units for those most vulnerable in the community. Additionally, the Flexible Services Program supported by MassHealth has provided tremendous services to those in a housing crisis. Through case management specifically geared toward housing, many households have been able to obtain either market rate or subsidized units. Those in crisis have had an advocate to help navigate the eviction process and gain access to assistance with rental arrears, etc. Tenant Based Rental Assistance (TBRA): Currently the Consortium does not have a TBRA program.

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

The Consortium's housing and shelter needs are greater than the available resources. As we move into the next few years this gap is going to continually grow.

Based on the 2022 PIT, the city has 28 unsheltered homeless and 125 sheltered homeless all looking to obtain affordable permanent housing. With shelter beds at capacity, 28 individuals were living on the street waiting to access a shelter bed.

There are significant gaps in emergency shelter opportunities for individuals, and no shelter allows for couples to remain together. Additionally the number of subsidized units does not currently meet the need of the consortium.

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 concern for the area are households that have always been housing cost-burdened, paying upwards of 50+% of income toward rent, are no longer able to sustain units as the prices for apartments in the area have increased substantially. One bedroom units previously renting for \$850 a month are now being rented for \$1,200-1,300 a month. Many are households with at least one working adult but their income cannot make the rental costs. Additionally, households with children continue to struggle with childcare challenges and school attendance due to ongoing issues with Covid-19. This prevents many parents from the ability to work full time.

Identify priority needs for qualifying populations:

A large number of households in the Consortium are cost burdened and severely cost burdened when it comes to how much of their income is being paid towards housing. If you are cost burdened or severely cost burdened you are at a greater risk of becoming homeless. Market constraints and rising rental costs, have made the ability of qualifying populations to obtain safe affordable housing almost impossible. A large majority of our homeless population also suffer from mental illness and substance abuse issues. Once a homeless individual does secure housing, it is very difficult for them to sustain that housing while dealing with their disability.

As illustrated above, the need of the consortium's qualifying populations is increasing the number of housing units that are affordable. The qualifying populations also need supportive services to sustain their housing and growing needs on a long-term basis. The consortium needs to increase the supply of permanent supportive housing units to promote housing stability among its qualifying populations.

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:

To determine the level of need and gaps in its shelter, housing inventory and service delivery systems, the Consortium used its annual Point-In-Time Count, and Housing Inventory Chart. The programs allowed for the Consortium to analyze what the current needs are and what services are available to meet those needs.

In preparation of this amendment the Consortium initiated discussion and meetings with service providers throughout the Consortium, and reached out to the consortium members as well. The goal of this outreach was to work closely with service providers to determine the needs of our communities and what obstacles service providers are facing when trying to meet those needs.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

GATHC goal is to leverage HOME-ARP funding with other Federal, State or local funding sources for the development of affordable housing.

Acquisition and Development of Non Congregate Shelters:

Funding will be allocated by a request for proposal (RFP) process. Emphasis will be placed on projects that are leveraging other funding sources.

Affordable Housing Development:

Funding will be allocated by a request for proposal (RFP) process. Emphasis will be placed on projects that are leveraging other funding sources.

If any portion of the PJ's HOME-ARP administrative funds were 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:

Enter narrative response here.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ #		
Acquisition and Development of Non-Congregate Shelters	\$ 1,500,000		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ 1,072,799		
Non-Profit Operating	\$ #	0 %	5%
Non-Profit Capacity Building	\$ #	0 %	5%
Administration and Planning	\$ 39,180	5 %	15%
Total HOME ARP Allocation	\$ 2,611,979		

Additional narrative, if applicable:

GATHC will allocate \$2,572,799 of HOME-ARP funding for the purchase and rehabilitation of affordable housing units and the the Acquisition and Development of Non-Congregate Shelters. These funds will also cover soft costs and a developer fee on each project. GATHC is also setting aside \$39,180 for administration and planning of the HOME-ARP Program

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:

In the 2022 PIT the Consortium counted 125 persons as sheltered homeless in Emergency Shelters. Also 28 people were classified as street homeless and were not able to access shelter. Based on the current housing market of decreased availability, increasing sales prices, increasing monthly rents and low vacancy, affordable housing is in limited supply. Landlords

are hesitant to rent to this population even when they have the benefit of a subsidy. Residents are finding it almost impossible to obtain affordable housing. GATHC public outreach for this amendment generated many responses. Based on those responses and the current homeless and housing inventories it is clear that the number one priority is to increase the supply of affordable housing available to the qualifying populations and to provide non-congregate care shelters. The Consortium will use HOME-ARP funding to produce affordable housing and to provide non-congregate care shelters.

HOME-ARP Production Housing Goals

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

GATHC estimates that the HOME-ARP grant could create 5 new affordable housing units. GATHC will also use, when available, leveraging from other federal, state and local funding sources. If other funding sources are not available, housing projects will be solely completed using HOME-ARP funding. GATHC estimates that the HOME-ARP grant can assist in the creation of 22 of non-congregate shelter units. GATHC will also emphasize the use, when available, leveraging from other federal, state and local funding sources.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ's priority needs:

GATHC estimates that the HOME-ARP grant could create 5 new affordable housing units. GATHC will also use, when available, leveraging from other federal, state and local funding sources. If other funding sources are not available, housing projects will be solely completed using HOME-ARP funding. GATHC estimates that the HOME-ARP grant can assist in the creation of 22 of non-congregate shelter units. GATHC will also emphasize the use, when available, leveraging from other federal, state and local funding sources

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:

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

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 category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

GATHC is not applying preferences to any qualifying populations.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

N/A

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***

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

