



HOME – American Rescue Plan Funding Affordable Rental Housing Development for Qualifying Populations



1. HOME ARP Allocation Plan
2. HOME ARP Housing Production Goals Worksheet
3. Augusta, Georgia HOME-ARP SF424, SF424B and related Certifications

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Augusta, Georgia HOME-ARP Allocation Plan

All guidance referenced in this plan, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in HUD CPD Notice CPD-21-10: Requirements of the Use of Funds in the HOME-American Rescue Plan Program.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Executive Summary

The City of Augusta has been allocated \$3,483,201 of HOME-American Rescue Plan Act (HOME-ARP) funding from the US Department of Housing and Urban Development (HUD). In order to receive the HOME-ARP allocation, the City must develop a HOME-ARP Allocation Plan that will become part of the City’s FY2021 HUD Annual Action Plan by substantial amendment.

To ensure broad input into the HOME-ARP Allocation Plan from stakeholders and the public, the City engaged in consultation with stakeholders and the public, including a virtual consultation session, a survey of stakeholders, a 15-day public comment period, and a public hearing.

The needs assessment and gap analysis identified the following needs and gaps within the City:

- In January 2022, the annual Point in Time (PIT) count revealed that 298 people were residing in emergency housing, either in shelter or transitional housing. Another 278 people were unsheltered on the streets, in tents or makeshift shelters, or in cars, vans, RVs or campers.
- The most recent CHAS Data from HUD reported over 25% of households with incomes at or below 30% AMI are at risk of homelessness in the City.
- The most recent HUD CHAS data indicates there are 7,585 renter households with an annual income at or below 30% AMI with a cost burden that are at greatest risk of housing instability.
- The CHAS data reports that there are 4,940 households with incomes more than 30 and but equal to or less than 50% AMI that are at risk of homelessness in the City because of at least one of the housing problems as defined by HUD.
- The greatest need for supportive services is in the areas of were mental health services, landlord/tenant liaison, housing search/counseling services, childcare assistance and financial assistance.

To address these needs within the community, the City will utilize HOME-ARP funds for developing affordable rental housing units and administration and planning for the HOME-ARP program.

The City will solicit applications from developers, service providers, and/or nonprofits to administer eligible activities and/or develop housing. A Request for Proposals (RFP) will be issued. The RFP will, at a minimum, specify eligible activities, eligible applicants, minimum and maximum funding amounts, application thresholds, and will provide instructions on how to submit a proposal.

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Introduction

The City of Augusta has been allocated \$3,483,201 of HOME-American Rescue Plan Act (HOME-ARP) funding from the US Department of Housing and Urban Development (HUD). To receive the HOME-ARP allocation the City of Augusta must develop a HOME-ARP Allocation Plan that will become a part of the City's PY2021 HUD Annual Action Plan by substantial amendment.

The HOME-ARP Cost Allocation Plan includes the following:

1. A summary of the consultation process and the results of consultation;
2. A summary of comments received through the public participation process and a summary of any comments or recommendations not accepted and the reason why;
3. A description of HOME-ARP qualifying populations within the jurisdiction;
4. An assessment of unmet needs of each qualifying population;
5. An assessment of gaps in housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system;
6. A summary of planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations;
7. An estimate of the number of housing units for qualifying populations the City will produce or preserve with its HOME-ARP allocation;
8. A description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population;
9. HOME-ARP Refinancing Guidelines; and
10. Certifications and SF-424, SF-424B, and SF-424D Forms.

The following entities are responsible for preparing the Cost Allocation Plan and those responsible for administration of the HOME-ARP grant.

Table 1 – Responsible Agencies

Agency Role	Name	Department/Agency
HOME Administrator	City of Augusta	Housing and Community Development Department

HOME-ARP Eligible Qualifying Populations and Activities

HUD's CPD Notice 21-10 Requirements for the Use of Funds in the HOME-American Rescue Plan Program establishes the requirements for funds appropriated under section 3205 of the American Rescue Plan Act of 2021 for the HOME Investment Partnerships Program (HOME) to provide homelessness assistance and supportive services.

The American Rescue Plan Act (ARP) defines qualifying individuals or families, including Veterans, which 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.

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. Program Planning and Administration

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction's geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans' groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

Stakeholder Consultation and Public Participation

HUD requires each HOME-ARP Participating Jurisdiction to consult with agencies and service providers whose clientele include the HOME-ARP qualifying populations. Agencies that must, at a minimum, be consulted include the Continuum of Care serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address fair housing, civil rights, and the needs of persons with disabilities.

HUD also requires that each Participating Jurisdiction provide opportunities for the public to comment on the proposed Allocation Plan, including the amount of HOME-ARP funds that will be received and the range of activities that the City may undertake.

To ensure broad input into the HOME-ARP Allocation Plan from stakeholders and the public, the City engaged in consultation with stakeholders and the public, including a virtual consultation session, a survey of stakeholders, a 15-day public comment period, and a public hearing.

Stakeholder Consultation

The City of Augusta consulted with the stakeholders listed in the following table in the development of the HOME ARP Cost Allocation Plan.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation
Augusta Housing Authority	Public, addresses needs of qualifying populations, serves as public housing authority	Direct consultation Survey
Augusta Homeless Task Force (CoC)	Private collaborative, addresses needs of qualifying populations including the homeless	Direct consultation Survey
SAFEHOMES Domestic Violence Agency	Non-profit, addresses needs of qualifying populations including homeless	Direct consultation Survey
Salvation Army Augusta Area Command	Non-profit, addresses needs of qualifying populations, including homeless	Direct consultation Survey
CSRA Economic Opportunity Authority, Inc.	Non-profit, addresses needs of qualifying populations, including homeless	Direct consultation Survey

Summary of Feedback Received from Consulted Organizations

Consultation revealed strong support for the following:

Development and support of affordable housing. Participants in these engagements were united in the need for additional affordable housing, specifically permanent supportive housing. Those replying to the survey also all agreed there was “high need” for this housing. There was discussion of various populations, represented by the agencies assembled, in need of both stable housing and services including case management.

Provision of supportive services. Many examples of supportive services were mentioned in the virtual session including case management, fair housing, mental health services, credit repair services, housing counseling, substance abuse services, and eviction defense. Survey respondents were asked to rank what they believed is the current need for various services eligible under HOME-ARP. The activities with the most rankings for “high need” were mental health services (88%), landlord/tenant liaison (86%), housing search/counseling services (78%), childcare assistance and financial assistance (75%).

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of

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

PJs are required to make the following information available to the public:

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

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

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: 3/6/2023***
- ***Public comment period: start date - 3/7/2023 end date – 3/22/2023***
- ***Date(s) of public hearing: 3/23/2023***

Describe the public participation process:

To provide opportunities for public participation, the City of Augusta sent an email to all agencies and individuals on its email list notifying them of the opportunity to participate in the consultation session to be held on April 21, 2022 as part of Augusta’s Homeless Task Force Meeting. In addition to attending the HTF consultation session, they were asked to complete an online survey regarding their views of the level of need for the eligible activities and qualifying populations as described by the CPD Notice 21-10. Those unable to attend, or who had further comments after the virtual session were invited to email them directly to City of Augusta staff.

Describe efforts to broaden public participation:

To broaden public participation, members of the public who are on HCD’s email list were also invited via email to attend the HTF consultation session held in the formulation of the Allocation Plan.

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

A summary of comments and recommendation received during the public comment period and at the public hearing will be included prior to the submission of this Allocation Plan to HUD.

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

A summary of comments and recommendations received but not accepted and the reasons why will be included prior to the submission of this Allocation Plan to HUD.

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Needs Assessment and Gaps Analysis

The needs assessment and gap analysis must evaluate the size and demographic composition of HOME-ARP qualifying populations, and unmet needs of HOME-ARP qualifying populations. In addition, the needs assessment and gap analysis must identify any gaps within its current shelter and housing inventory, and service delivery system.

This needs assessment and gap analysis focuses on the following:

1. Sheltered and unsheltered homeless populations;
2. Currently housed populations at risk of homelessness;
3. Other families requiring services or housing to prevent homelessness; and
4. Those at greatest risk of housing instability or unstable housing situations.

Housing Inventory Count

The annual Housing Inventory Count (HIC) provides useful context regarding the number and type of beds and units that are available for individuals and families experiencing on any given night. The following tables summarize beds and units available as of January 2022 in the City of Augusta by bed type.

Emergency housing beds include emergency shelter and transitional housing; emergency shelter generally allows for short-term or nightly stays, while transitional housing generally allows for a stay up to 24 months. Both types of emergency housing may include supportive services designed to facilitate movement to independent living.

DATA TO BE UPDATED WITH 2023 Point in Time PRIOR TO SUBMISSION

Rapid rehousing provides security and utility deposits and/or monthly rental and utility assistance for rental units that rent for less than the fair market rent. Assistance is generally provided for the shortest period of time necessary for a household to gain stable housing and can range from 3 to 24 months. Permanent supportive housing provides for an unlimited lease term; residents receive services necessary to promote continued housing stability.

DATA TO BE UPDATED WITH 2023 Point in Time PRIOR TO SUBMISSION

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	#	#	#	#	#								
Transitional Housing	#	#	#	#	#								
Permanent Supportive Housing	#	#	#	#	#								
Other Permanent Housing	#	#	#	#	#								
Sheltered Homeless						#	#	#	#				
Unsheltered Homeless						#	#	#	#				

<i>Current Gap</i>											#	#	#	#
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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)		#	
<i>Current Gaps</i>			#

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:

Homeless as defined in 24 CFR 91.5

The 2022 Point in Time Count Data for individuals and families in shelters show Augustans who identify as Black or African American are more likely to experience homelessness in Augusta when compared to other racial identities. Further, those who identify as male are more likely to experience homelessness than other gender identities. Augustans with severe mental illnesses, chronic substance abuse issues, and/or are fleeing domestic violence make up a larger proportion of the special needs groups in the sheltered population.

At Risk of Homelessness as defined in 24 CFR 91.5

The number and demographic composition of the extremely low income households (ELI) in Augusta has been used to describe the size and demographic composition of qualifying populations at-risk of homelessness. The ELI households are likely to be a subset of the ELI population, and real-time assessment of actual housing stability status within the ELI demographic is too volatile to ascertain a true representation without including the characteristics of the broader demographic.

Those at greatest risk of homelessness are severely cost burdened, paying more than 50% of gross monthly income for housing, inclusive of utility costs. The table below is included with data for ELI owner and renter households for all demographic groups combined.

Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	3,059	1,197	100	4,356	488	375	265	1,128
Large Related	509	186	0	695	94	0	0	94
Elderly	727	460	124	1,311	615	395	490	1,500
Other	2,140	677	126	2,943	704	339	130	1,173
Total need by income	6,435	2,520	350	9,305	1,970	1,080	780	3,830

Table 1 – Cost Burden > 50%

Data Source: 2012-2016 CHAS

In summary, the majority of ELI renter households experience severe housing cost burden. In addition, a significant proportion of ELI owner households also experience severe cost burden.

Severe cost burden is an indicator that households may be at risk of homelessness or housing instability, since very little is left for other life necessities after paying for housing and utilities each month. A car repair, illness or injury, or other urgent need may push these households into homelessness or housing instability.

During the recovery from the economic impacts of the Covid-19 pandemic has been Augusta's ability to make use of Emergency Rental Assistance provided under both the CARES ACT and the American Rescue Plan, to assist local renter households with arrearages threatening mass eviction with the secession of the Federal Eviction Moratorium in 2021. Operated in Partnership with United Way of the CSRA, the program served as one of the most vital safety nets for at-risk households in the City of Augusta- the 211 Hotline saw the percentage of callers needing housing or shelter assistance grow by 500% relative to need between 2019 and 2020. Like in many metro American communities, in Augusta income does not meet basic needs of many households. The rate of unemployment and local low paying jobs make it challenging for people with disabilities and older adults with fixed incomes to remain stably housed. Low educational attainment throughout the area impacts access to income and creates employment barriers. Many households have a difficult time accessing educational programs that would help them obtain their high school diploma or GED or attend vocational school. Transportation is also a barrier to education both children and adults. The lack of affordable and accessible quality childcare and early childhood programs also impact the Augusta, Georgia region. For employees and people seeking work outside of traditional work hours have the added challenge of lack of extended hour or overnight care for their children.

For residents with criminal backgrounds or with past eviction histories seeking employment or housing, there are even more limited options. The Augusta area lacks a sufficient number of affordable rental properties. The City of Augusta's renter population, whose income is 30-50% AMI, are the greatest at risk population of being homeless due to substandard conditions of existing housing stock. Outside of recent programs derived from Federal Covid-19 related funding, there have traditionally been few rental assistance programs in Augusta that provide rental deposits, home repair assistance, utility assistance, or eviction defense/eviction expungement. Even for families who are able to obtain rental assistance, it is difficult to find property managers or landlords who accept housing vouchers or other forms of third-party (i.e. assistance) payments.

In further complications of inflation related economic instability, many households in the Augusta area are over income for SNAP benefits (formerly known as food stamps), but are still unable to afford the rising costs of food and other necessities. In many parts of Augusta there are food deserts, limited food pantry options, and transportation challenges that make it hard to access affordable, much less healthy, food options. A high percentage of individuals in the City of

Augusta do not have health insurance (15% or one out of 6 individuals). Since Georgia was one of the states that chose not to adopt Medicaid expansion, ELI households lack the social safety net of subsidized medical care. There are very limited treatment options in the area for people with mental health and substance use issues, particularly for people without health coverage. This combination of factors centralizes the need for increased availability and accessibility of affordable housing in Augusta to bring stability to turbulent economic times in the wake of volatile price environments in many other basic needs.

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

Domestic violence is one of the leading causes of homelessness for women and their children. Although safe housing can provide a pathway to freedom, there are many barriers that prevent survivors from obtaining or maintaining safe and affordable housing. The majority of survivors experience financial abuse, meaning that they have not had access to the family finances, have been prohibited from working, or have had their credit scores destroyed by an abusive partner. Victims may also face discrimination in accessing or maintaining housing based on the violent or criminal actions of perpetrators. Additionally, victims are limited in the locations and types of housing they can access because of their unique safety and confidentiality needs, and many housing or homelessness assistance programs have barriers that inadvertently exclude victims of violence.

Human trafficking is also an issue in Georgia, specifically in Augusta. National research indicates that many of the risk factors and vulnerabilities of human trafficking reflect circumstances faced by HOME-ARP qualifying populations, including caretaker substance use, involvement with the child welfare and/or foster care system, juvenile justice involvement, mental health concerns, runaway or homeless youth, underemployment or unemployment, and unstable housing, among many others. Two of the top five risks/vulnerabilities for human trafficking are homelessness and unstable housing. The majority of statistics about human trafficking are state level data, such as reports from the World Population Review that indicate that the state of Georgia is one of the most extensive hubs of the United States of human trafficking horror. About four of every 100,000 people in Georgia are human trafficking victims, the 7th highest human trafficking rate in the United States. It's important to understand that because sex trafficking is often conducted on the dark web or other secretive platforms, the full scope of the problem isn't known, which means local and national statistics on human trafficking are likely underestimated. Also, survivors of sex trafficking are often manipulated and coerced, so it's an underreported crime. This combination of data and context makes the issue of human / sex trafficking a major concern in the state of Georgia, including within the Augusta area.

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

The most recently available CHAS data indicates that there were 26,385 households in Augusta at or below the Area Median Household Income that had issues with either housing affordability or substandard housing conditions. Households that had at least 1 of 4 severe housing problems comprised roughly 15% of the total households in the Augusta area. Over 17,000 households were either cost burdened (paying more than 50 % of gross income for housing) or had zero or negative income, regardless of whether they had any substandard housing issues.

Children and youth are a population that faces homelessness, yet they are not always eligible for homelessness services for the CoC and other funding streams. Local community partners shared that approximately 300-400 school-aged students in the 2021/2022 academic year were facing homelessness under the McKinney-Vento Act definition in the Richmond County school district. That group includes students and their families who are couch surfing, doubled up, or in other unstable housing situations that are not considered “homelessness” under many of the other HUD programs, but they do fall under the “other special populations” definition for HOME-ARP purposes.

Other populations, as defined by HOME-ARP, include those who:

1. Are currently housed and at risk of repeat homelessness;
2. Have incomes at or below 30% AMI and are experiencing severe housing cost burden; and
3. Otherwise meet the definition of at risk of homelessness and have incomes of more than 30% and at or below 50% AMI.

Other Populations: At greatest risk of housing instability – Households with incomes 30-50% AMI that meet HUD’s §91.5 definition of at risk of homelessness

Households in this category are those with incomes more than 30% and at or below 50% AMI that lack sufficient resources or support networks to prevent homelessness, and

- Have moved more than two times due to economic reasons in the past 60 days;
- Are doubled up with another household due to economic hardship;
- Will be evicted within 21 days;
- Live in a hotel or motel without financial assistance from a nonprofit or government entity;
- Live in an efficiency apartment and are overcrowded;

- Are exiting a publicly funded institution or system of care

HUD Comprehensive Housing Affordability Strategy (CHAS) 2014-2018 data Table 10 provides information on households that include more than one family, household income level and overcrowding. The CHAS data indicates that there are approximately over 23,000 renter households with incomes between 30 and 50 % AMI that are at risk of homelessness in the City because of at least one of the housing problems as defined by HUD. In addition, 919 households are living in rental dwellings that are considered “overcrowded” by HUD standards (i.e. 1.5 persons per bedroom, usually with more than one family per unit).

Housing Problems (Households with one of the listed needs)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Substandard Housing - Lacking complete plumbing or kitchen facilities	205	80	14	80	379	55	20	10	10	95
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	120	70	105	0	295	8	19	25	15	67
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	165	204	230	25	624	10	10	64	130	214

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Housing cost burden greater than 50% of income (and none of the above problems)	6,354	2,244	279	10	8,887	1,849	1,110	885	135	3,979
Housing cost burden greater than 30% of income (and none of the above problems)	930	2,359	3,244	475	7,008	434	914	1,985	742	4,075
Zero/negative Income (and none of the above problems)	1,650	0	0	0	1,650	655	0	0	0	655

Table 2 – Housing Problems Table

Data 2014-2018 CHAS
Source:

Unmet Service Needs of Qualifying Populations

Based on consultation with service providers in the City, the greatest unmet service needs of qualifying populations, including sheltered and unsheltered homeless populations, currently housed populations at risk of homelessness, other families requiring services or assistance to prevent homelessness, and those at greatest risk of housing instability or in unstable housing situations are:

- mental health services
- landlord/tenant liaison services
- housing search/counseling services
- childcare assistance
- financial assistance

Additional unmet service needs of qualifying populations, including sheltered and unsheltered homeless populations, currently housed populations at risk of homelessness, other families requiring services or assistance to prevent homelessness, and those at greatest risk of housing instability or in unstable housing situations include the following:

- Case management services
- Credit repair services
- Education Services
- Food assistance
- Job training and employment services
- Legal services
- Mediation services
- Outpatient health services
- Outreach services
- Substance abuse treatment
- Services for special populations

Describe the unmet housing and service needs of qualifying populations:

Sheltered and Unsheltered Homeless as defined in 24 CFR 91.5

Data analysis shows a gap of at least 250 adult shelter beds and 50 or more family / child shelter beds. This indicates unmet housing needs among unsheltered homeless adults in Augusta, Georgia. The true number of unsheltered homeless adults is likely to be larger due to the challenges of collecting PIT data. In addition, shelter beds are unavailable to a small but not irrelevant portion of the local unsheltered homeless population based upon their barriers related to criminal status, documentation and other related obstacles to attaining shelter in Augusta.

In terms of services for sheltered and unsheltered homeless populations, survey data and HTF interview results indicate a strong need for supportive services and other assistance such as transportation, mental health care, legal care, and other services. The unsheltered and sheltered homeless population in Augusta also suffer from mental health issues and/or substance abuse problems, which can hinder them from obtaining and retaining employment. They also tend to isolate themselves from the public, making it more challenging for provider outreach to make contact and assist individuals with case management.

People experiencing homelessness who rely on public transportation in Augusta have found transit difficult to navigate, with complicated bus routes and limited stops and time offerings. Buses are currently underutilized and there is no alternative centralized transportation system in the City. For people experiencing homelessness (and others), who need to connect with services, attend school/work/ trainings, or even check available housing listings, the inability to get around the City serves as barrier to accessing critical services that would help facilitate housing stability and permanency, and improve quality of life overall. Moreover, the hours of transportation are limited to traditional work hours, leaving people who work second or third shifts unable to use transportation to get to and from jobs. Most of the transportation lines focus toward downtown, so additional challenges exist for people who need public transportation to access jobs or services outside of the downtown area.

People experiencing homelessness in Augusta also report a lack of available jobs they can fairly compete for, with employment opportunities often going to individuals with more experience/skills. Jobs that are available are often part-time, below living wage, and evening/graveyard shifts. Having to juggle multiple low-wage jobs to make ends meet and cover basic costs, make the availability for extended hour or overnight childcare options all the more essential. In addition, employment agencies were reported to be clustered in one area of the City that is not central to “downtown,” where shelters are located, making it less accessible for people experiencing homelessness to obtain employment.

At Risk of Homelessness as defined in 24 CFR 91.5

- Many formerly homeless and rapid re-housing assistance recipients live from paycheck to paycheck and often need more than twelve months of supportive services and financial assistance to secure decent safe housing that can remain affordable to them. Rent and utility assistance continue to be needed by low-income residents of Augusta, Georgia.
- The lack of health insurance can be a key determinant of health status and housing instability along with inconsistent access to health care, which often results in illness, longer hospitalizations, and increased vulnerability to mental health conditions.
- The limitations of the local transportation system and impact the ability for people at risk of homelessness to retain employment and stable housing. For people at risk of

homelessness, stable employment may be located outside the transportation systems reach and/or buses do not run during their evening or weekend working shifts. For families working late night shifts, they are often forced to resort to taking Ubers back home which are increasingly cost prohibitive for households that are already cost burdened and only earning minimum wage.

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

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:

Identify priority needs for qualifying populations:

Priority needs for qualifying populations are:

- Affordable rental housing
- Supportive services including:
 - Landlord/tenant liaison services o mental health services
 - financial assistance services
 - transportation services
 - housing search and housing counseling services
 - childcare assistance
- Tenant-based rental assistance

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:

Enter narrative response here.

HOME-ARP Activities

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

The City will solicit applications from developers, service providers, and/or nonprofits to administer eligible activities and/or develop HOME-ARP Rental Housing. A Request for Proposals (RFP) will be issued. The RFP will, at a minimum, specify eligible activities, eligible applicants, minimum and maximum funding amounts, application thresholds, and will provide instructions on how to submit a proposal.

Describe whether the PJ will administer eligible activities directly:

Augusta, Georgia will administer eligible activities related to the acquisition, construction, renovation and rehabilitation of affordable housing units utilizing HOME ARP funding.

If any portion of the PJ's HOME-ARP administrative funds are provided to a sub recipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the sub recipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the sub recipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Augusta, Georgia will administer eligible activities related to the acquisition, construction, renovation and rehabilitation of affordable housing units utilizing HOME ARP funding and will not provide sub recipient contracts utilizing HOME ARP funds.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Development of Affordable Rental Housing	\$ 2,960,721	85%	N/A
Administration and Planning	\$ 522,480	15 %	15%
Total HOME ARP Allocation	\$ 3,483,201		

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

Development and renovation of affordable rental housing units. This plan allocates \$2,960,721 for the development and renovation of affordable rental housing units using HOME-ARP funds. During the consultation process, the development of other eligible activity resources was discussed and debated. However, the resounding feedback focused on the lack of affordable rental housing units available, specifically to the qualifying populations that this plan aims to serve. Based on the assessments and analysis provided in this plan, the City believes the need is great and should be addressed, and is therefore focusing investment of HOME-ARP funds in to the development of affordable rental housing units.

The City of Augusta has limited affordable rental housing stock. Many of the affordable rental housing units that do exist are old and need updating. According to stakeholder feedback, many landlords or property managers would prefer to rent sub-standard housing to low-income people who are willing to rent, rather than invest in the units to bring them up to code or to update them to be more accessible and eligible to receive housing assistance. Of the units currently in the community's inventory, those that do come on the market and are available for rent to qualifying populations, there are insufficient numbers of the size needed for people on the verge of homelessness. The city lacks studio units or one-bedroom units.

The City of Augusta proposes to use HOME-ARP funds to acquire parcels for, construct and/or rehabilitate existing housing stock for at least 40 units of affordable housing. With the unexpected and unprecedented resources made available through the HOME-ARP allocation, the sustainable investment in increasing the affordable housing stock at this scale will have tremendous long-term impact on the nature of Augusta's housing stock in to the future. The introduction of these affordable housing units will also help to address the unit gap created by local landlords that are often unwilling to rent to the qualifying populations this plan aims to serve. Also not to be understated is that this will also afford the opportunity for some HOME-ARP eligible households to rent housing that is decent, safe and affordable.

Program Administration and Planning. This plan allocates \$522,480 towards the administration and planning functions of the HOME-ARP funds, in line with the statutory limit of 15% of the total award.

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 gaps analysis reflected Augusta, Georgia has insufficient housing and housing services, limited access to support services and an unstable combination of crisis services. These all leave Augusta at a deficit in meeting the housing needs of residents of the community, particularly those who are low and moderate-income and the qualifying populations that this plan aims to serve. Augusta's recent Homeless Task Force Strategic Plan, in addition to interviews and surveys completed in the composition of both that plan and the HOME-ARP Cost Allocation Plan, reflected the same sentiments that these gaps, specifically the lack of affordable rental housing units, are impediments to Augusta's response to the current housing stability crisis.

HOME-ARP funds represent a "once-in-a-lifetime" opportunity to respond to and intentionally address these gaps. Of the opportunities to use the funding, paired with other community resources, the best use of the funds is to focus on developing affordable rental housing and the services to help people maintain their housing. The community has several sources of funding of tenant-based rental assistance including HCV, CoC, EHV, ESG, HOPWA, state funded behavioral health programs, as well as EHV and Mainstream Vouchers.

Augusta's community partners have continuously expressed the challenges and impediments created with tenant-based rental assistance programs not being able to access decent, safe, affordable units in our community. This creates a systemic inefficiency when there are, unfortunately, large numbers of voucher holders unable to utilize their housing benefit due to this lack of available housing stock. This lack of affordable housing has downstream impacts, not just on residents experiencing or at-risk of experiencing homelessness, but also people fleeing domestic violence and other populations that regularly experience housing instability.

As Augusta continues to grow its economic base with infusion of jobs at Fort Gordon Cyber Command and the downtown Cyber Center campus, the increased local interest in market-rate development has created a stall in the development of affordable housing units, particularly for rental opportunities. In every year's planning process, there is consistent feedback on the insufficient housing stock for those residents that need it most.

The investment of HOME-ARP funds to address the longitudinal issues surrounding affordable rental housing availability is a catalyst in moving these conversations forward and helping to ensure that Augusta is a community where anyone that wants to can have a stable home. The new affordable rental housing units developed using HOME-ARP funds will be units that can make use of the many tenant-based rental assistance projects and funds already available to low and moderate-income residents of Augusta.

HOME-ARP Housing Production Goals

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

The City estimates it will develop up to approximately 40 affordable rental units with the funds allocated by this plan, either through new construction, renovation or rehabilitation. There is not yet a plan on the table for this project, so the City cannot project exact units, or whether they will be new construction or an acquisition and/or rehabilitation of an existing structure.

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:

With respect to this plan, the goal of the City of Augusta is to increase affordable rental housing stock in the community, specifically smaller units, such as studios and one-bedroom apartments. The HOME-ARP allocation will be used to create affordable rental housing units with 100% of the units developed made available to HOME-ARP qualifying populations. Augusta will look to optimize impact from this funding to support new construction, renovation and rehabilitation; the end goal being the maximum amount of decent, safe and affordable units added to the community's inventory as possible. Through solicitation for the development of these units, Augusta will emphasize efficiency wherever possible, asking potential partners and developers to leverage other resources that may be available from other funding sources to best meet the needs of the HOME-ARP qualifying populations.

All throughout the consultation process, feedback from stakeholders in the community gave the clear impression that there is a desperate need for more units of affordable housing. People mentioned the lack of units available, the substandard condition of some of the units that are being rented currently, the number of abandoned buildings, and the recent closing of facilities that support qualifying populations.

Stakeholders also identified the insufficient number of small units available for people to rent in the City. Given the limited resources available from HOME-ARP and the need for smaller units, the City will leverage the HOME-ARP funds for smaller units, enabling a greater quantity of new affordable housing to come online in the City.

Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A preference permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A method of prioritization is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).



- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.**

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

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:

ARP requires HOME-ARP activities to primarily benefit households in the qualifying populations. To improve the feasibility and maintain the long-term viability of projects with HOME-ARP rental units for qualifying households, a PJ may invest HOME-ARP funds in units that are not restricted for occupancy solely for qualifying populations as described in the HOME ARP regulations.

-  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.

Units developed by Augusta, Georgia utilizing the HOME ARP Allocation will be developed with preferences designed to address the housing needs of the qualifying populations described in the HOME ARP regulations, specifically the Chronically Homeless population in the Augusta community.

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:

Augusta, Georgia has a large unmet need in the Permanent Supportive Housing inventory available to residents of the community who are experiencing long-term, repetitive episodic homelessness and require intensive service supports to acquire and sustain permanent housing.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, sub recipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ must include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

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):

For HOME-ARP Rental Housing Projects, Augusta, Georgia intends to utilize the community's existing Coordinated Entry System (CES) for referral and placement in HOME-ARP Rental Units. Augusta's CES, the Marion Barnes Resource Center, is operated by the local Community Action Agency (CAA) CSRA Economic Opportunity Authority, also known as CSRA EOA, Inc. The CES is overseen by the local Continuum of Care through Augusta's Homeless Task Force's Executive Board.

Referrals to the HOME-ARP Rental Housing Project Sponsor, Augusta Housing and Community Development, shall incorporate all necessary considerations for HOME-ARP Preferences, Fair Housing Rights and Compliance, local service prioritization methodology and other factors to formulate the referrals for placement in HOME-ARP Rental Housing units.

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):

For the sheltered, unsheltered, and at risk of homelessness populations, the City will recommend use of the Coordinated Entry System (CES), which assesses each individual or household to identify any immediate, emergent needs and risk factors, and to evaluate their overall level of vulnerability, including basic and housing-related needs. Based on those assessments, the Coordinated Entry System will make referrals to participating agencies. For those requiring services or housing assistance to prevent homelessness, and those at greatest risk of housing instability or unsuitable housing situations who may fall outside CES, the City will also utilize the CES system run by CSRA Economic Opportunity Authority (CSRA EOA) to provide referrals to participating providers.

CSRA EOA is an integral partner working to serve vulnerable populations. They have done a great deal of work to research and identify other qualifying populations, partnering with local organizations that both work within and outside the homeless system of care. HUD, through CSRA EOA, is a primary funder of the CES Information & Referral system. As calls for assistance come into the CES system and through local partners who serve qualifying populations who are not served by CES (e.g., the school district identifies families experiencing housing instability who are "couch surfing" or "doubled up," therefore ineligible for assistance through CES), referrals for affordable housing will be made directly to the HOME-ARP projects. The HOME-ARP providers will develop lists from those referrals based on first come, first served criteria. As units become available, the HOME-ARP provider will make referrals based on the households determined to have the highest service need and largest barriers to traditional affordable housing rental markets.

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):

Augusta's CoC currently prioritizes placement for Permanent Supportive Housing through a standardized assessment of persons experiencing chronic homelessness and possessing one more disabling conditions. Prioritization for placement is done through the cultivation of an acuity score that is used to ensure that the hardest to serve (i.e. residents with most barriers to housing stability) are prioritized for placement in Permanent Supportive Housing units.

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):

Augusta intends to utilize an expanded CE process established in partnership with the local Continuum of Care for referral and placement in HOME-ARP Rental Housing Units.

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a

disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

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:

Augusta does not intend to utilize any Limitations to the eligible Qualifying Populations for HOME-ARP Rental Housing units.

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:

Augusta does not intend to utilize any Limitations to the eligible Qualifying Populations for HOME-ARP Rental Housing units.

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):

Augusta does not intend to utilize any Limitations to the eligible Qualifying Populations for HOME-ARP Rental Housing units.

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:

The City of Augusta does not plan to use HOME-ARP funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds. Therefore, refinancing guidelines pursuant to 24 CFR 92.206(b) are not applicable to this HOME-ARP Allocation Plan.

APPENDIX A: CITIZEN PARTICIPATION

Summary of Citizen Participation Comments

xxx-xxx, 2023 Allocation Plan Public Review and Comment Period

A summary of comments and recommendation received during the public comment period and at the public hearing will be included prior to the submission of this Allocation Plan to HUD.

Public Hearing on xxxx, 2023

A summary of comments and recommendation received during the public comment period and at the public hearing will be included prior to the submission of this Allocation Plan to HUD.

APPENDIX B:

SF-424 Grant Applications,
SF-424D Assurances and
Allocation Plan Certifications

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