

# HOME-ARP Allocation Plan

Substantial Amendment to FY 21 Annual Action Plan

State of Oregon  
Oregon Housing & Community Services



March 2023



## Executive Summary

In May 2021, Congress passed the American Rescue Plan (ARP) which included HOME-ARP resources to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter to reduce homelessness and increase housing stability across the country. Oregon received an allocation of approximately \$33 Million in HOME-ARP resources. These one-time dollars are in addition to the annual allocation of HOME received by the State of Oregon, but similarly are for use in “balance of state” communities that do not receive their own direct allocation of HOME-ARP or HOME dollars.

To receive the HOME-ARP allocation, OHCS has developed this HOME-ARP Allocation Plan that will become part of the OHCS 2021 Annual Action Plan through a substantial amendment.

In developing this HOME-ARP Allocation Plan, OHCS engaged broadly with partners and stakeholders, consulted directly with HUD-required organizations, convened 15-day public comment period, and held a public hearing prior to submitting the plan to HUD for review.

Development of the HOME-ARP Allocation Plan includes the HUD-required Gaps Analysis/Needs Assessment highlighting the following gaps and needs of qualifying populations in Oregon:

- Recent Point-in-Time (PIT) and Housing Inventory Count (HIC) data reflect sheltered homeless households of approximately 3,000 across the state, including adults with and without children, veteran households, and those escaping domestic violence.
- Additionally, the same data sets indicate that approximately 6,793 households are homeless without shelter.
- Oregon has approximately 5,600 rental units affordable to the approximately 30,000 households with incomes below 30% AMI but the gap in affordable housing is approximately 6,700 rental housing units.

OHCS will address these gaps and needs by utilizing HOME-ARP resources to fund the development of permanent affordable rental housing in rural Oregon communities. Additionally, HOME-ARP resources will support capacity building efforts in rural communities to increase the ability of smaller communities to provide service enriched housing for Oregon’s most vulnerable populations.

A Notice of Funding Availability (NOFA) will solicit HOME-ARP funding applications for projects serving eligible HOME-ARP populations in rural communities as well as requests for HOME-ARP capacity building resources to better position rural communities to develop service enriched housing.



# Table of Contents

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Introduction .....	1
Consultation .....	2
Public Participation .....	4
Needs Assessment and Gaps Analysis .....	6
HOME-ARP Activities .....	11
HOME-ARP Production Goals .....	13
HOME-ARP Preferences.....	13
HOME-ARP Refinancing Guidelines.....	.13



# Introduction

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Oregon was awarded an allocation of \$32,894,168 in HOME-ARP resources that must be fully expended by September 30, 2030. To receive these HOME-ARP resources, HUD must approve the Oregon HOME-ARP Allocation Plan, which follows HUD's prescribed template as follows:

- **Consultation:** This section summarizes the community engagement that occurred as part of identifying community priorities for HOME-ARP activities in Oregon
- **Public Participation:** This section discusses how the public was provided with the opportunity to comment on the draft HOME-ARP Plan. It also contains a summary of the community engagement that informed the Plan.
- **Needs Assessment and Gaps Analysis:** This section provides information on the size, demographic makeup, and unmet housing needs of HOME-ARP qualifying populations.
- **HOME-ARP Activities:** This section describes what HOME-ARP-eligible activities OHCS will fund with HOME-ARP dollars and describes the process that OHCS will use to distribute HOME-ARP resources for eligible affordable rental projects and capacity building efforts.
- **HOME-ARP Production Housing Goals:** This section contains unit goals for the production of affordable housing using HOME-ARP dollars.
- **HOME-ARP Preferences:** This section identifies any preferences OHCS will establish for one or more qualifying populations.
- **HOME-ARP Refinancing Guidelines:** This section indicates whether or not OHCS will allow rental rehabilitation projects requesting HOME-ARP resources to refinance existing debt.

## HOME-ARP Eligible Populations

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#));
- At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11360\(1\)](#));
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
- In other populations where providing supportive services or assistance under section 212(a) of the Act ([42 U.S.C. 12742\(a\)](#)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability;
- Veterans and families that include a veteran family member that meet one of the preceding criteria.



### HOME-ARP Eligible Activities

- Production or Preservation of Affordable Housing
- Tenant-Based Rental Assistance (TBRA)
- Supportive Services, including services defined at [24 CFR 578.53\(e\)](#), homeless prevention services, and housing counseling.
- Purchase and Development of Non-Congregate Shelter. These structures can remain in use as non-congregate shelter or can be converted to: 1) emergency shelter under the Emergency Solutions Grant program; 2) permanent housing under the Continuum of Care; or 3) affordable housing under the HOME Program.

## Consultation

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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 the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities. States are not required to consult with all Continuums of Care or PHAs in their jurisdiction.

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 state may undertake.

To ensure broad input into the HOME-ARP Allocation Plan, OHCS engaged in consultation with stakeholders and the public, including convening virtual consultation sessions, directly engaging with HUD-required organizations that did not participate in a virtual session, publishing a 15-day public comment period notice, and scheduling a public hearing.

In developing the HOME-ARP Allocation Plan, OHCS utilized a variety of methods to consult existing stakeholder and partner networks.

- OHCS conducted consultation through regularly scheduled online meetings of a variety of stakeholder networks, industry associations, and partner groups such as the Oregon Statewide Unhoused Network, Oregon Veterans Housing Network, the OHCS Housing Stabilization network of Community Action Agencies, and Housing Oregon to name a few. Collectively, the membership of these networks and participation within HOME-ARP meetings represented all groups required for consultation in the development of the



HOME-ARP Allocation plan, including homeless service providers, organizations serving all four qualifying populations, fair housing organizations, and those serving individuals with disabilities.

- Additional consultation conversations were scheduled to solicit more targeted feedback from public housing authorities, local elected officials, and rural continuum of care organizations.
- OHCS presented the HOME-ARP Allocation Plan and the Homeless Housing Response NOFA Framework to the OHCS advisory body, Housing Stability Council, over the course of its development.
- OHCS held a public meeting to solicit feedback on the draft HOME-ARP Allocation Plan before its finalization and submission to HUD for review.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation
<b>Oregon Statewide Unhoused Network</b>	Statewide network of agencies and organization serving homeless populations	Online meeting
<b>Oregon Veterans Housing Network</b>	Statewide network of veterans housing and service providers	Online meeting
<b>Housing Authorities of Oregon</b>	Statewide network of Public Housing Authorities	Online meeting
<b>League of Oregon Cities</b>	Statewide network of cities	Online meeting
<b>Association of Oregon Counties</b>	Statewide network of counties	Online meeting
<b>Community Action Network</b>	Statewide network of community action agencies	Online meeting
<b>Rural Oregon Continuum of Care</b>	Continuum of Care Organization	Online meeting
<b>Fair Housing Council of Oregon</b>	Statewide civil rights organization	Email
<b>Housing Oregon</b>	Statewide housing and community development association	Online meeting



### **Summary of feedback received**

Entities consulted in the development of the Oregon HOME-ARP Allocation Plan acknowledged significant investments made by the Oregon State Legislature into non-congregate shelter and rent assistance programming during the 2019-2021 Biennium and generally agreed using HOME-ARP resources to further the goal of increasing permanent rental housing was a funding priority given the abundance of rent assistance resources and oversubscribed nature of existing rental development resources. A repeated topic of discussion was how to identify services in rural communities for additional supportive housing units as well as the need to identify project-based rent assistance to support operating costs in affordable housing serving populations with little or no ability to pay rent.

## **Public Participation**

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As part of developing the HOME-ARP allocation plan, HUD requires that HOME PJs encourage and incorporate public feedback into the development of the plan. As such, it is required that the public be provided with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of no less than 15 calendar days before it is submitted to HUD for review and approval. In accordance with this requirement, OHSC utilized existing elements of our approved Citizen Participation Plan for public notice requirements and reasonable accommodations. Also, as required, OHCS held a public hearing to get feedback on the draft HOME-ARP allocation plan prior to submitting the plan to HUD. One additional objective of the public hearing was to ensure that the public was aware how much HOME-ARP was awarded to Oregon and which eligible activities were being proposed by OHCS.

### **Public Notice Process**

- **Date(s) of public notice:** 2/24/2023
- **Public comment period:** start date: 2/24/2023, end date: 3/13/2023
- **Date(s) of public hearing:** 3/13/2023

### **Description of the public participation process:**

- OHCS used its vast stakeholder distribution email list to make the public aware that the HOME-ARP Draft Allocation Plan was available for review.
- Stakeholders were notified that the HOME-ARP Allocation Plan and Homeless Housing Response Framework on the Housing Stability Council website on three different occasions throughout the development and finalization of the plan.
- Public Notices regarding the public comment period and public hearing date were issued in 3 major newspapers across Oregon: The East Oregonian, Bend Bulletin, The Oregonian. One of these notices is provided below as an example:





The State of Oregon through the Oregon Housing and Community Services (OHCS) is seeking public comments for our HOME American Rescue Plan (HOME ARP) funding priorities included in the following document:

- HOME ARP Allocation Plan

All Oregon residents are invited to submit comments during the 15-day public comment period beginning **Friday, February 24, 2023, and ending Monday, March 13, 2023**. Written comments may be submitted to Oregon Housing and Community Services; attention Andrea Matthiessen, HOME and HTF Program Manager, 725 Summer Street NE Suite B, Salem, OR 97301-1266; or by email at [andrea.matthiessen@hcs.oregon.com](mailto:andrea.matthiessen@hcs.oregon.com). Verbal comments may be submitted by calling (503) 986-0963. **Comments are due no later than Monday, March 13, 2023.**

A copy of all this document, and any applicable attachments, are available at <https://www.oregon.gov/ohcs/development/Pages/grants-tax-credit-programs.aspx>

OHCS is committed to providing meaningful access. For accommodations, modifications, translation, interpretation or other services, please contact the OHCS office at (503) 986-2100, TTY 503-986-2100, or email at [housinginfo@oregon.gov](mailto:housinginfo@oregon.gov).

Las personas sordas o con impedimentos adultos pueden usar un TTY llamando al 503-986-2100, o al servicio de relevo 711/otro acomodacion deben cumincarse con Andrea Matthiessen al (503) 986-0963 a la brevedad posible.

Questions, concerns, or requests for information in alternative formats from individuals with disabilities must be submitted to Andrea Matthiessen before March 13, 2023.

OHCS will be holding a public hearing for these documents on **Monday, March 13, 2023, at 1:00 pm PST**.

Register in advance for this meeting:

<https://us02web.zoom.us/join/register/tZEtcuurj4jEtRF7IeIsPjZZI7ytrykY4v>

After registering, you will receive a confirmation email containing information about joining the meeting.

Oregon Housing and Community Services programs are administered in a non-discriminatory manner, consistent with Equal Opportunity Employment Opportunities, Affirmative Action, and Fair Housing requirements.

#### Description of efforts to broaden public participation:

OHCS used its existing email distribution list and HOME-ARP Allocation Plan materials were also posted on the [OHCS HOME-ARP webpage](#).

#### Highlights of comments received during the public participation process:

- Allow for deeper development subsidies for projects serving very low-income households
- Support for non-congregate shelter options
- Support for increasing capacity of community-based organizations
- Prioritize rural communities for development resources
- Lack of support for new initiatives and programs





## Needs Assessment and Gaps Analysis

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This section of the HOME-ARP Allocation Plan addresses the size, demographic composition, and unmet housing need of the four HOME-ARP qualifying populations:

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#));
- At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11360\(1\)](#));
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
- Other populations where providing supportive services or assistance under section 212(a) of the Act ([42 U.S.C. 12742\(a\)](#)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability;

Additionally, it identifies gaps within the current shelter and housing inventory and service delivery system for the populations including, but not limited to:

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

Oregon has eight Continuums of Care (CoCs) whose Point in Time (PIT) and Housing Inventory Count (HIC) data are reflected in the Oregon HOME-ARP Gaps Analysis/Needs Assessment:

1. Central Oregon
2. Clackamas County
3. Jackson County
4. Lane County
5. Portland/Multnomah County Consortium
6. Salem/Marion and Polk County
7. Washington County
8. Balance of State (Rural Oregon Continuum)

In 2021, an estimated 13,428 people experienced unsheltered homelessness across Oregon on a single night, according to an analysis of PIT counts (where conducted) and trends over time. An additional 4,579 people were reported to have experienced sheltered homelessness on a single night in January. This gives a total of 18,007 people experiencing homelessness across the state, although major gaps in the available data mean this number may not be completely accurate and is not directly comparable to earlier years. CE data from a similar timeframe (January to March) showed 25,678 people experiencing homelessness across the state. Because CE lists are continuously updated and managed in different ways across the state, they are not



directly comparable to PIT counts, but both increased from 2020 to 2021. The modeled PIT count grew by 34.1 percent over that time and the CE count by 49.3 percent.

Demographic analysis was complicated by PIT count waivers, the fact that not all CoCs collected the same demographic data in CE lists, and a lack of available data from school districts on student homelessness for the 2020 to 2021 school year.

**Gaps within the current shelter and housing inventory as well as the service delivery system:**

Within this PJ, a comparison of individuals in families experiencing homelessness with current beds for this subpopulation shows a gap of 1,226 beds. For individual adults experiencing homelessness, this gap is 8,264 beds. An analysis of CHAS data for this PJ show a gap of 99,600 housing units for households at 0%-50% area median income and with one or more severe housing problems.

Anecdotally, there are challenges in delivering services to people experiencing homelessness in rural areas due to the large travel times and distances. In urban areas, service delivery for people experiencing unsheltered homelessness is complicated by funding constraints for outreach workers and other services when compared to the total subpopulation.

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	296	106	861	861	12								
Transitional Housing	193	83	496	496	86								
Permanent Supportive Housing	1,027	440	1,041	1,041	880								
Other Permanent Housing						270	721	460					
Sheltered Homeless						345	2,254	308	82				
Unsheltered Homeless						1,042	5,037	476	238				
<b>Current Gap</b>										3,265	1,028	8,393	5,614



Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	385,830		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	8,840		
Rental Units Affordable to HH at 50% AMI (Other Populations)	7,485		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		60,770	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		55,155	
<b>Current Gaps</b>			99,600

### Homeless as defined in 24 CFR 91.5

The 2022 Annual Homeless Assessment Report indicates an estimated 17,959 people experienced unsheltered homelessness across Oregon on a single night, using an analysis of unsheltered PIT counts (where conducted) and modeled trends over time. That same report shows Oregon as one of the top 5 states with the largest changes in homelessness at 22.5% (an increase of 3,304 households). An additional 5,178 people were reported to have experienced sheltered homelessness. This gives a total of 18,606 people experiencing homelessness across the state, although major gaps in the available data mean this number may not be completely accurate. Coordinated entry (CE) and by-name lists from a similar timeframe showed 25,678 people experiencing homelessness across Oregon.

### Demographics: Gender Identity

Women	Men	Transgender	Gender Non-Conforming
925	1,682	24	26

### Demographics: Ethnicity

Non-Hispanic/Latino	Hispanic/Latino
2,305	352

### Demographics: Race

White	Black or African American	Asian	American Indian or Alaskan Native	Native Hawaiian or other Pacific Islander	Multiple Races
1,872	344	22	107	57	255



Across Oregon, people of color—especially those who Black or African American and American Indian or Alaskan Native—experience homelessness at a disproportionately higher rate than White people. For example, an analysis of CE and HBNL data in 2021 show that 9.3% of those on the lists across the state are Black or African American, despite making up only 2.2% of the overall population according to census estimates for the same period. The same analysis showed American Indians or Alaskan Natives comprise 7.2% of those on such lists across the state, although they made up only 1.8% of the overall population.

#### Homeless: Unmet Housing Need

Within this PJ, a comparison of individuals in families experiencing homelessness with current beds for this subpopulation shows a gap of 3,265 beds. For individual adults experiencing homelessness, this gap is 8,393 beds. An analysis of CHAS data for this PJ show a gap of 48,911 housing units for households at 0%-50% area median income and with one or more severe housing problems.

Anecdotally, there are challenges in delivering services to people experiencing homelessness in rural areas due to the large travel times and distances. In urban areas, service delivery for people experiencing unsheltered homelessness is complicated by funding constraints for outreach workers and other services when compared to the total subpopulation.

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

Households at risk of homelessness are those with incomes below 30% AMI that lack sufficient resources or support networks to prevent homelessness, and 1) have moved more than two times due to economic reasons in the past 60 days, 2) are doubled up with another household due to economic hardship, 3) will be evicted within 21 days, 4) live in a hotel or motel without financial assistance from a nonprofit or government entity, 5) live in an efficiency apartment and are overcrowded, or 6) are exiting a publicly-funded institution or system of care.

#### Unmet Housing Need for Households At-risk of Homelessness

Across Oregon, there is a shortage of nearly 110,000 rental homes affordable and available to the over 140,000 extremely low-income households whose incomes are at or below 30% of area median income (AMI). 80% of these households are severely cost burdened, spending more than half of their income on housing. Severely cost burdened poor households are more likely than other renters to sacrifice other necessities like healthy food and healthcare to pay the rent, and to experience unstable housing situations like evictions.

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

On a single day in 2020, 59% of Oregon's domestic violence programs reported serving 1,123 adult and child victims of domestic violence. During this same 24-hour period, 300 Hotline calls were received, averaging 13 contacts per hour. Victims made 118 requests for services that



were unmet due to lack of resources. In 2018, Oregon sexual and domestic violence services received 128,786 calls.

Unmet Housing Need for Household Fleeing Domestic/Dating Violence, or Sexual Assault

The HUD Continuum of Care Homeless Assistance Programs domestic violence Subpopulation for 2020 included 397 sheltered and 1,088 unsheltered individuals compared to the same report for 2022 which indicated 712 unsheltered and 920 sheltered and 1,371 households reported.

According to the 2019 Oregon Statewide Shelter Study, all but six counties in Oregon have at least one domestic violence (DV) shelter. However it is likely that many people housed in family shelters have also experienced domestic violence. The U.S. Department of Health and Human Services found that “between 22 percent and 57 percent of all homeless women report that domestic violence was the immediate cause of their homelessness.”

**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**

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

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

The 2022 HUD AHAR Report shows that 6,447 estimated individuals experiencing homelessness in Oregon have repeated patterns of homelessness, with over 30 percent of all individuals experiencing homelessness having chronic patterns of homelessness. In this same report, Oregon had the second largest absolute increase of all states in the number of individuals experiencing chronic patterns of homelessness, with 2,324 more individuals experiencing chronic patterns of homelessness were counted than in 2020.

According to 2021 ACS data, 47% of renter households in Oregon with incomes between 30 and 50% AMI are severely cost burdened, spending more than 50% of their income on rent. Additionally, 85% of households with incomes between and 50% AMI are cost burdened, spending more than 30% of their income on rent.

According to a recent assessment by Oregon Housing and Community Services and ECONorthwest, Oregon needs an additional 72,777 units of housing for households below 30% of the median family income in their region and therefore at possible risk of homelessness, but not already experiencing homelessness. Based on a study by Portland State University, as of June 2021 approximately 59,400 Oregon households had no confidence in their ability to pay next month’s rent and an additional 66,000 had only slight confidence, demonstrating high levels of housing instability. Many of these households likely required housing assistance to



prevent homelessness, as an estimated 25%-62% of households that are evicted enter homelessness according to multiple regional studies.

### **Unmet Housing and Service Needs of the Qualifying Populations**

The greatest unmet housing needs of the four qualifying populations are:

- Permanent rental housing that is affordable to qualifying and other populations; and
- Service enriched supportive rental housing that coordinates specialized services with housing that is affordable to qualifying and other populations.

### **Oregon determined the level of need and gaps in the State’s shelter and housing inventory and service delivery systems based on the data presented in the plan:**

Level of need and gaps in shelter and housing inventory and service delivery systems were determined using the 2022 Annual Homeless Assessment Report to Congress, 2021 and 2022 PIT and HIC data, Comprehensive Housing Affordability Strategy (CHAS) data, American Community Survey data, the 2021-2025 OHCS Consolidated Plan, conversations with service providers, and the following published reports:

- Bates, Lisa K., Marisa Zapata, Jacen Greene, and Stefanie Knowlton. *Updated Cost of Oregon Evictions - June*. Portland, OR: Portland State University, 2021.
- Green, Timothy, Marisa Zapata, and Jacen Greene. *Oregon Statewide Homelessness Estimates 2021*. Portland, OR: Portland State University Homelessness Research & Action Collaborative, 2021.
- Oregon Housing and Community Services and ECONorthwest. *Building on New Ground: Meeting Oregon’s Housing Need*. Salem, OR: Oregon Housing and Community Services, 2021.
- Substance Abuse and Mental Health Services Administration. *Behavioral Health Barometer: Oregon, Volume 6: Indicators as measured through the 2019 National Survey on Drug Use and Health and the National Survey of Substance Abuse Treatment Services*. HHS Publication No. SMA–20–Baro–19–OR. Rockville, MD: Substance Abuse and Mental Health Services Administration, 2020.
- Substance Abuse and Mental Health Services Administration. *2020 National Survey of Drug Use and Health*. Rockville, MD: Substance Abuse and Mental Health Services Administration, 2020.

## **HOME-ARP Activities**

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OHCS will solicit HOME-ARP funding applications through a Notice of Funding Availability (NOFA). The notice will specify eligible activities (affordable housing development and capacity building support) and applicants for rental development resources (private and non-profit housing developers, community-based organizations, public housing authorities, and Federally recognized Tribes). Applications will be scored at a minimum based on capacity, readiness to



proceed, integration of tenant services, and leveraged resources, including identification of project-based rent assistance resources.

Applicants requesting capacity building resources will be required to identify barriers to developing service enriched housing for eligible HOME-ARP populations in their community and describe anticipated actions for addressing those barriers and how the use of HOME-ARP capacity building resources will be used to increase capacity to develop affordable rental housing for HOME-ARP eligible populations.

OHCS will administer the planning, administration, and funding of eligible HOME-ARP activities directly. No subrecipients or contractors will be responsible for program administration on behalf of the state.

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 0		
Development of Non-Congregate Shelter	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 24,670,627		
Non-Profit Operating	\$ 1,644,708	5 %	5%
Non-Profit Capacity Building	\$ 1,644,708	5 %	5%
Administration and Planning	\$ 4,934,125	15 %	15%
<b>Total HOME-ARP Allocation</b>	<b>\$ 32,894,168</b>		

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

The Oregon HOME-ARP Needs Assessment and gap analysis indicated a need for permanent housing associated with populations that are homeless or at greatest risk of homelessness. As such, OHCS will distribute the majority of HOME-ARP resources to address this identified need.

**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 HOME-ARP Gaps Analysis/Needs Assessment clearly shows the need for affordable rental housing for qualifying populations with incomes under 30% AMI. Prioritizing HOME ARP resources to increase the inventory of units available to these households will help to fill that gap.

The number of severely cost burdened renters in Oregon could also be supported through the use of HOME-ARP funds for tenant-based rental assistance. However, given the shortage of





available units, particularly in high demand communities, implementing a new tenant-based rental assistance program is unlikely to meet the needs of Oregon’s most vulnerable renters. Considering the recent infusion of emergency housing vouchers directly from HUD to local public housing authorities, adding new vouchers could also create unnecessary competition for scarce units.

Using HOME-ARP resources to create service enriched housing will help to stabilize Oregon’s lowest-income renters who are at high risk of housing instability and homelessness or are currently experiencing homelessness and seeking opportunities for housing stability. Service enriched rental housing will help to address the needs of Oregon’s growing population of people experiencing chronic homelessness or people with disabilities who need supportive services coupled with affordable housing.

## HOME-ARP Production Housing Goals

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OHCS anticipates producing approximately 80 units of service enriched affordable rental housing for HOME-ARP qualifying populations. Because most HOME-ARP qualifying populations are also extremely low-income, these rental units will specifically address the need for units affordable to households with income less than 30% AMI.

Increasing the availability of affordable rental housing for eligible HOME-ARP populations will address the need for permanent housing identified in the HOME-ARP Gaps Analysis/Need Assessment.

## Preferences

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OHCS does not intend to give preference to one or more of the HOME-ARP qualifying populations or subpopulations.

## HOME-ARP Refinancing Guidelines

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OHCS does not intend to use HOME-ARP resource to refinance existing debt in multifamily housing being rehabilitated with HOME-ARP funding.

