

### **Department of Housing and Neighborhood Programs**

#### HUD Consolidated Plan 2021-2025 Consolidated Plan Amendment FY 2021 Annual Action Amendment Citizen Participation Plan

- 2021-2025 Consolidated Plan Amendment-HOME-ARP Allocation \$2,675,234
- FY 2021 Annual Action Plan Amendment-Priority Need-Acquisition/Rehab (reallocate)
- Citizen Participation Plan-Revised
- FY 2021 HOME-ARP Allocation Plan

(Public Comment Period December 1, 2021 – December 30, 2021)

#### INTRODUCTION

This document is a substantial amendment to the City of Little Rock' 2021-2025 Consolidated Plan, FY2021 Annual Action Plan, and Citizen Participation Plan based on HOME Investment Partnerships Act (42 U.S.C 12701 et seq.) and Section 3205 of the American Rescue Plan ("ARP") (Pub. L. No. 117-2).

Title 24 Section 91.505 of the Code of Federal Regulations stipulates the participating jurisdictions shall amend their approved plans whenever they make the following decisions:

- 1. To make a change in its allocation priorities or a substantial change in the method of distribution of funds.
- 2. To carry out a new activity using funds from any program covered by the Consolidated Plan (including program income), not previously described in the Annual Action Plan.
- 3. To substantially change the purpose, scope, location, or beneficiaries of an activity.

This regulation further requires that jurisdictions identify in their citizen participation plans the criteria that they will use for determining what constitutes a substantial amendment.

Consistent with these requirements, the City of Little Rock Citizen Participation Plan, states that substantial amendments to the Consolidated Plan or Annual Action Plan are required when the City of Little Rock Community Development Division wishes to make one of the following changes:

- 1. A proposed new activity which cannot reasonably be construed to have been included within the programmatic intent of the adopted application or in the commitment of funds to a specific project; or
- 2. An activity that was identified in the adopted application, but which subsequently is proposed to be deleted; or
- 3. An activity that is proposed to be altered in terms of its purpose, scope, location, or beneficiaries to such an extent that it can no longer reasonably be construed as the activity reviewed by the public and approved by the Consolidated Plan Advisory Committee.
- 4. The criteria to be used in determining if an activity is at risk of becoming substantially changed from its originally intended purpose will be based upon further Consolidated Plan Advisory Committee actions to modify/amend the Consolidated Plan proposed activities.

- 5. City staff shall proactively monitor each funded project for compliance with its respective performance criteria and provide periodic progress reports to the Consolidated Plan Advisory Committee.
- 6. Any activity that is judged to be at risk of substantially changing from its originally intended propose, scope, location, or beneficiaries will be reviewed in a public hearing forum prior to a decision by the Consolidated Advisory Plan Committee as to whether the performance objectives of the project shall be amended.
- 7. An application for a CDBG Section 108 Loan Guarantee.

The proposed change is to carry out the following activities not previously described in the Consolidated Plan and the Annual Action Plan:

The proposed change is to cancel a project and reallocate the funding to a new project in the Annual Action Plan:

- Acquisition/Rehabilitation-2020 Program Income (HOME)—Decrease Funding \$276,217.35
- New Construction–2020 Program Income (HOME) —Increase Funding \$276,217.35

#### PROPOSED AMENDED SECTION

#### I. 2021-2025 CONSOLIDATED PLAN – STRATEGIC PLAN

The proposed substantial amendment will amend the Strategic Plan of the 2021-2025 Consolidated Plan in the following sections:

- A. SP-35 Anticipated Resources
  - Add \$2,675,234 in HOME-ARP supplemental allocation made available through the HOME Investment Partnerships Act (42 U.S.C 12701 et seq.) and Section 3205 of the American Rescue Plan ("ARP") (Pub. L. No. 117-2) for activities to primarily benefit individuals and families that meet the requirements for one or more "qualifying populations" (QPs) of homelessness.

#### SP-45 Goals

- a. Increase 3.1 SL Community & Public Facilities/ Park and Rec Repairs (\$1,000,048.90 HOME-ARP) to develop and provide housing assistance to 50 homeless households for a limited time to reduce their risk of homelessness.
- b. Increase 2.1 DH New Construction of owner/rental housing (\$423,900.00 HOME-ARP) to acquire and construct 4 new units to assist the homeless.
- c. Increase 1.6 SL Other Special Needs to provide assist to 55 households (\$350.000.00 HOME-ARP) for supportive services, homeless prevention services, and housing counseling.
- Increase 2.5 DH Rental Assistance to provide housing assistance to enable 35 homeless and/or low- moderate income households (\$500.000.00 HOME-ARP) with permanent housings or to remain in their homes to avoid risk of homeless.
- e. Increase O.1 Administration to reflect the HOME-ARP administration and planning (\$401,285.10).

#### II. 2021 ANNUAL ACTION PLAN

The proposed substantial amendment will amend the 2020 Annual Action Plan in the following sections:

- B. AP-15 Expected Resources
  - a. Include HOME-ARP supplemental allocation of \$2,675,234 for eligible activities that primarily benefit individuals and families that meet the requirements for one or more "qualifying populations" (QPs) of homelessness. The activities are Tenant-Based Rental Assistance (TBRA), Production or Preservation of Affordable Rental Housing, Purchase and Development of Non-Congregate Shelter, Administration, Supportive Services, Homeless Prevention Services and Housing Counseling.
- C. AP-20 Annual Goals and Objectives
  - a. Add 2.6 DH Rental Housing Assistance-provide housing assistance to enable 35 homeless and/or low-moderate income households with permanent housings or to remain in their homes to avoid risk of homeless.

- b. Add 3.1 SL Community & Public Facilities/ Park and Rec Repairs to develop and provide housing assistance to 50 homeless households for a limited time to reduce their risk of homelessness.
- c. Add 1.6 SL Other Special Needs for supportive services, homeless prevention services, and housing counseling.
- d. Increase 2.1 DH New Construction of owner/rental housing to acquire and to construct 4 new units to assist the homeless.
- D. AP-35 Projects & AP-38 Project Summary
  - a. Add Community & Public Facilities/ Park and Rec Repairs (HOME-ARP \$1,000,048.90) to develop and provide housing assistance to homeless households for a limited time to reduce their risk of homelessness.
  - b. Add Other Special Needs (HOME-ARP \$350,000.00) for supportive services, homeless prevention services, and housing counseling.
  - c. Add HOME Rental Assistance (COVID-19)-Eligible HOME activities are Tenant Based Rental Assistance for low-and moderate income households with rental assistance for a limited time (\$500,000.00), and increase administrative funds to reflect HOME-ARP (\$401,285.10).
  - d. Reallocate Acquisition/Rehabilitation (2020 Program Income) \$279,217.35 for New Construction (2020 Program Income)
  - e. Increase New Construction of owner/rental housing to acquire and to construct 4 new units to assist the homeless.
- E. AP-55 Affordable Housing
  - a. Increase 1-year goals for the number of households to be supported for homeless by 105.
  - b. Increase 1-year goals for the number of households to be supported for rental assistance by 39.
  - c. Update the narrative in the discussion section to reflect HOME-ARP Activities

#### III. CITIZEN PARTICIPATION PLAN

The Citizen Participation Plan was revised to include a comment period timeframe of less than thirty (30) days prior to submission to HUD when granted by HUD. The shorter comment period can range from 3-days to 15-days.

#### IV. HOME-ARP ALLOCATION PLAN

#### Introduction

In September 2021, the U.S. Department of Housing and Urban Development awarded the City of Little Rock of \$2,675,234 in HOME-American Rescue Plan Act of 2021 ("HOME-ARP") funding from the U.S. Department of Housing and Urban Development (HUD) made available through the HOME Investment Partnerships Act (42 U.S.C 12701 et seq.) and Section 3205 of the American Rescue Plan ("ARP") (Pub. L. No. 117-2). HOME-ARP fund is to be used to help communities create affordable housing and services for people experiencing or at risk of experiencing homelessness.

In order to receive funding, the City must develop and submit to HUD for approval a HOME-ARP Allocation Plan which describes the distribution of funds and identify any preferences for eligible activities. The development of the Plan is based on the requirements of Community Planning and Development (CPD) Notice 21-10. It involves stakeholder consultation and community engagement. The following is the HOME-ARP Allocation Plan.

#### Consultation

The City of Little Rock recognizes that partnerships with public and private entities as well as the community are vital to the provision of effective services to the Little Rock community. These partners provide the expertise needed to develop our Plan.

During the planning process for the amendment to 2021 Annual Action Plan to include HOME-ARP, the City of Little Rock consulted with the community, city departments, public and private organizations in the development of the update to the Consolidated Plan. The process includes public meetings to hear community views on housing and community development needs, as well as, consulting with public and private entities.

Currently, the City has monthly meetings with the Homeless Providers throughout the city. These non-profits were invited to a special meeting in April 2021, to brainstorm about the HOME-ARP. The group listed additional shelter beds and rental housing as current needs of the homeless.

#### Summarize the consultation process:

The City conducted two (2) virtual meetings and three (3) public meetings to inform the public of the additional HOME-ARP allocation and the type of eligible activities. Other public/private entities were invited and contacted to provide additional information to develop the HOME-ARP Allocation Plan. The consensus of the group that all the eligible activities are need for the City.

#### List the organizations consulted and feedback Table 1

Agency/Organization Consulted	Type of Agency/Organization	Method of Consultation	Feedback
Better Community Development (BCD)	CHDO/Housing	Public Meeting	BCD supported the need for funds providing housing options.
Central Arkansas Team Care for the Homeless (CATCH)	Homeless	Meetings	CATCH supported the need for the funds to address supportive services and providing housing options.
Pulaski County Community Service (PCCS)	Other Government- County	Public Meeting HMIS	PCCS provided HMIS data which was used in planning.
University District Development Corporation (UDDC)	CHDO/Housing	Public Meeting	UDDC supported the need for funds providing housing options.
Little Rock Housing Authority / Metropolitan Housing Alliance	PHA/Housing	Public Meeting	MHA supported the need for the funds to address supportive services and providing housing options.
Little Rock, City of	City Departments	Meetings	City supported the need for supportive services, shelter, and other housing options.
St. Francis House	Homeless/Housing	Public Meeting	St. Francis House was contacted to provide additional information on services for the qualified population.
Family Promise of Pulaski County	Homeless/Housing	Public Meeting	Family Promise of Pulaski County was contacted to provide additional information on services for the qualified population.

Agency/Organization Consulted	Type of Agency/Organization	Method of Consultation	Feedback
Our House	Homeless/Housing	Public Meeting	Our House was contacted to provide additional information on services for the qualified population.
Women & Children First	Domestic Violence	Public Meeting	Women & Children First was contacted to provide additional information on services for the qualified population.
Jericho Way-Depaul USA	Homeless	Public Meeting	Jericho Way supported the need for supportive services, shelter, and other housing options.

#### **Public Participation**

## Describe the public participation process, including information about and dates of the public comment period and public hearings held during the development of the plan:

In developing the 2021 Amended Annual Action Plan, the City followed a detailed citizen participation plan. This included input from other City departments, residents, non-profit organizations, and other public and private entities that provide assisted housing, social service housing and supportive service providers to special needs population.

The City conducted two (2) virtual meetings and three (3) public meetings throughout the City to discuss HOME-ARP Allocation. On August 29<sup>th</sup> and September 26<sup>th</sup>, the public notices were published in the Arkansas Democrat-Gazette in English and Spanish. The meeting were as follows:

Date	Туре	Location
09/16/21	1 <sup>st</sup> Public Hearing	Virtual-WebEx
10/04/21	Public Meeting	West Central Community Center, 4521 John Barrow Rd
10/07/21	Public Meeting	Dunbar Community Center, 1001 W 16 <sup>th</sup> St
10/18/21	Public Meeting	Southwest Community Center, 6401 Baseline Rd
10/21/21	Public Meeting	Virtual-WebEx

The 2021 Amended Annual Update to the Consolidated Plan will be available for review and comment during a 30-day comment period from December 1, 2021 through December 30, 2021. The updated plan will be available on the City's website, local libraries, and City's community Centers for review. A public hearing will be conducted at the December 21, 2021 Board of Director's meeting as another opportunity to comment on the plan.

#### Describe any efforts to broaden public participation:

Three (3) mail outs of over two-hundred fifty (250) notices in English and Spanish were sent to residents about the public hearings and public meetings. The public meetings were held at differed times to increase public participation. All meetings were advertised on City's Website as well as NextDoor App. Citizens could comment through email, voicemail, and postal mail.

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

This section is pending the conclusion of the comment period.

## Summarize the comments and recommendations not accepted and state the reasons why:

This section is pending the conclusion of the comment period.

#### **Needs Assessment and Gaps Analysis**

Table 2

	Homeless												
Current Inventory			Homeless Population										
	Fan	nily	Adult	s Only	Vets			Victims	Family		Adults Only		
	# of Beds	# of Units	# of Beds	# of Units	# of Beds	Family	Adult	Adult Vets	of DV	# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	188	56	453	453	31								
Transitional Housing	70	26	171	171	47								
Permanent Supportive Housing	370	129	826	826	495								
Other Permanent Housing						0	0	0	0				
Sheltered Homeless						93	520	65	44				
Unsheltered Homeless						22	551	56	17				
Current Gap										+143	+28	-447	-447

Data Sources: 2020 Point in Time Count (PIT); 2020 Continuum of Care Housing Inventory count (HIC)

#### Table 3

	Non-Homeless		
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	35165		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1980		
Rental Units Affordable to HH at 50% AMI (Other Populations)	970		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		5645	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		5260	
Current Gaps			-7955

Data Sources: 2013-2017 American Community Survey (ACS); 2013-2017 Comprehensive Housing Affordability Strategy (CHAS)

## Describe the size and demographic composition of qualifying populations within the Participating Jurisdiction's (PJ's) boundaries:

#### Homeless:

The 2020 Point In Time (PIT) count discovered 1,186 people who were homeless in Little Rock. The estimated number of "sheltered" homeless people in the four central Arkansas counties increased by 11.36% from 2019. A total of six hundred thirteen (613) persons were counted as "sheltered homeless", with 79% residing in emergency shelters and 21% residing in transitional housing in 2020.

Over 69.3% of the people counted as homeless in 2020 PIT count identified as male, 30.3% as female, the remaining 0.4% of the people identified as transgender or gender non-conforming. More than 86% were persons over age of 24. A fifth of the people were identified as chronically homeless and with a majority listed as unsheltered. Veterans counted for 10.2% of the homeless.

The homeless population consist of 51.7% Black/African-American and 44.5% White. The current racial makeup of the City is 40.6% Black/African-American and 43.4% White. The homeless rate of Black/African-American is slightly higher than the percent current living in the City while the homeless rate for White is consist.

ADE Data Center reported the first quarter of the 2021/2022 school year for Pulaski County there were eight hundred ninety-five (895) homeless students. The following are the homeless types:

Number of Types	Homeless Types	
53	Sheltered	
783	Doubled Up	
6	Unsheltered	
53	Hotels/Motels	
0	Unaccompanied Youth	

#### At Risk of Homelessness:

Comprehensive Housing Affordability Strategy (CHAS) breakdown data occupied housing units by HUD Area Median Family Income (HAMFI), including 30% and below HAMFI and by their housing problems. The 2013-2017 CHAS data shows that over 25% of all rental households units experience severe housing problems with 16% of rental households at 30% and below of HAMFI.

Based on the 2019 ACS-1 year estimated the City's poverty rate is 12.3%. Households that are receiving assistance and are nearing the end of that assistance are facing uncertain housing situations, especially considering the current COVID-19.

## Fleeting or Attempting to Flee, Domestic Violence, Sexual Assault, Stalking, or Human Trafficking:

According to the Women & Children First 37.3% of Arkansas women and 35.6% of Arkansas men experience intimate partner physical violence, intimate partner sexual violence and/or intimate partner in their lifetimes; 453 victims in Arkansas were served by domestic violence shelters and programs in one day; an estimated 18.6% of Arkansas women will experience stalking in their lifetime; and as of December 31, 2015, Arkansas had submitted 2,460 misdemeanor domestic violence records and no permanent protective order records to the NICS Index.<sup>1</sup>

Five percent of the 2020 PIT respondents reported experiencing domestic violence. In the last four years the City has experienced an increase each year. From 2010-2019, there was an average of 154 domestic violence-related calls per year

#### Other populations:

There is an estimated 80,285 occupied housing units in Little Rock. Approximately 14% percent were comprised of a household with an annual income that was less than or equal to 30% of the area median income (AMI). Over 43% percent are renters and 35% percent of the renters reported earning less than or equal to 30% of AMI. Sixteen percent of the renters earning was less than or equal to 30% or AMI while another 14% percent earning between 31% to 50%.

The 2020 PIT count reported that 121 people (10.2%) who were homeless were Veterans. Over 46% percent of the Veterans counted were living in unsheltered conditions.

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

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

There were 743 first-time homeless clients based on the 2020 System Performance Measures for the CoC. There was an increase in days spent in Emergency Shelters +15 nights and +37 Transitional Housing with average stay of 71 nights.

There are 624 shelter beds for households without children. This is a deficiency of 447 shelter beds for this population. The beds for household with children are currently sufficient.

Approximately, 7,955 rental households have 1 or more severe housing problems for households with income between 0% to 50%. This is a major problem for households.

<sup>&</sup>lt;sup>1</sup> https://www.wcfarkansas.org/statistics/

The 2021 CoC Application reported that Domestic Violence had a need for 199 clients, but are currently serving 104 with unmet 95.

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

The City doesn't own a shelter. They have partnered with North Little Rock and contracted with Depaul USA to handle the day to day operations of the Jericho Way Homeless Day Center.

The City reallocated HOME funds to provide TBRA in response to COVID-19. Thirty-four households were assisted. The City also received ESG-CV and ESG funds from Arkansas Department of Human Services. Approximately 230 individuals and 113 households were assisted. The City still has ESG-CV funds available. The City partnered with three (3) organizations to provide emergency rental assistance with CDBG-CV. The organizations are Central Arkansas Development Council (CADC), St. Francis House, and Family Promise of Pulaski County. Approximately 563 households were assisted.

The City continued to serve as the Collaborative Applicant for the Central Arkansas Continuum of Care (CoC). In this role, assistance was provided to member agencies seeking Homeless Assistance Grants through HUD Super NOFA competitive application process. The Central Arkansas CoC was awarded eight (8) grants for a total of \$3,027,153.00.

Arkansas Department of Human Services and Arkansas Economic Development Council received additional allocation of 7.8 million in CARES Act and 173 million U.S. Dept. of the Treasury funds which has been a tremendous relief for Pulaski County.

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

There is a current gap of 447 shelter units for single adults and youth which includes a place to live that is affordable paired with supportive services. This was due to the increase in the homeless and to allow for social distancing during the COVID.

The estimated gap of affordable rental homes that are needed in Little Rock is approximately 7,955 rental homes. Housing affordability in Little Rock impacts the HOME-ARP qualifying populations, but also other low-and moderate-income households and other vulnerable populations, such as persons with disabilities and person fleeing domestic violence, sexual assault, and sex trafficking. The affordability gap for renters is growing while income continues to grow at a slower pace causing a cost burdened.

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

The high cost burden is a housing characteristics strongly linked with instability and an increased risk of homelessness. The federal minimum wage is \$7.25. In 2020 the state minimum wage was \$10.00 and increased to \$11.00 in 2021. Massachusetts Institute of Technology, Department of Urban Studies and Planning Living Wage Calculator reported Little Rock's living wage for an individual is \$13.97 per house or about \$29,058 annually. If you are a single parent with three children, then you need to make at least \$45.33 per hour. Two working parents with three children in Little Rock would need to make at least \$22.76 per hour to sustain a livable wage.

#### Identify priority needs for qualifying populations:

Even though the needs of each group generally overlap, each of these populations may have greater needs than others. Those who are experiencing or are at-risk of homelessness need more affordable housing and shelter options that short-term, mid-term and long-term interventions. Those who are at-risk of homelessness have a strong need for homelessness prevention and stabilizing services, while those who are currently homeless or experiencing chronic homelessness need more street outreach and case management services.

Families or individuals fleeing domestic or dating violence has a critical need for temporary shelter for safe harboring and supportive services to help them transition to permanent supportive housing. These families and individuals also need supportive services to assist them like the legal advocacy, childcare, employment services, and case management.

As identified in the Homeless Needs Inventory and Gap Analysis Table, the greatest need in the City is housing interventions for single adults and households with AMI less than 30% and between 30%-50%. These households need support with staying housed. Most of these households will also need a livable wage and supportive services to create long-term self-sufficiency.

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

The data represented in this report is a compilation of the 2013-2017 CHAS, the 2020 PIT count, and the 2021-2025 Consolidated Plan. All of the Plans had various methodologies and went through extensive public consultation process including multiple public hearing.

#### **HOME-ARP** Activities

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

The City plans to administer activities directly. In the event the City is not able to administer the activities then applications will be solicited for developers, service providers, subrecipients and/or contractors.

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

The City will not allocate funds to a subrecipient or contractor to administer the entire HOME-ARP grant.

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 350,000.00		
Acquisition and Development of Non- Congregate Shelters	\$ 1,000,048.90		
Tenant Based Rental Assistance (TBRA)	\$ 500,000.00		
Development of Affordable Rental Housing	\$ 423,900.00		
Non-Profit Operating	\$ 0.00	0 %	5%
Non-Profit Capacity Building	\$ 0.00	0 %	5%
Administration and Planning	\$ 401,285.10	15 %	15%
Total HOME ARP Allocation	\$ 2,675,234.00		

#### Use of HOME-ARP Funding

#### Additional narrative, if applicable:

## Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rational for the plan to fund eligible activities:

One of the major gaps in the City's homeless inventory is access to affordable housing. People experiencing housing crisis or fleeing an unsafe situation need to find a place to stay quickly. Access to this type of housing is a current gap in the system. Emergency shelter and interim housing can help to fill this gap. Also a shelter can help those experiencing homelessness or individuals who fleeing, or attempting to flee, domestic violence and sexual assault.

#### **HOME-ARP Production Housing Goals**

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

The following table estimates the number of affordable rental housing units qualifying populations:

Supportive Services	55
TOTAL	55
Non-Congregate Shelters	50
Tenant Based Rental Assistance	35
Rental Housing	4
TOTAL	89

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

HOME-ARP Tenant-Based Rental Assistance (TBRA) will assist qualifying households with rental assistance and security deposits. The City will establish a maximum rental assistance term of 24 months using the HOME-ARP funds. The City intends to undertake TBRA activities to assist persons who are experiencing homelessness and those who are fleeing or attempting to flee domestic violence to locate, obtain, and maintain permanent housing.

HOME-ARP funds may be used to acquire, rehabilitate, or construct affordable housing primarily for occupancy by households of individual and families that meet the definition of one or more of the qualifying populations. Priority will be given to projects that develop rental housing for person who are experiencing homelessness and those who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD.

#### Preferences

## Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

Individuals and families that are experiencing or at-risk of homeless will be priority. In addition to housing instability, homeless individuals are more susceptible to acute health concerns, physical or sexual assault, and drug and alcohol abuse, making them some of the most vulnerable populations and in need of specialized and intense services. Housing or shelter assistance will support these families or individuals leaving homelessness.

The City will also give priority to families or individuals who are fleeing, or attempting to flee, domestic violence, and sexual assault.

# If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The City will support activities that prioritize families and individuals who are the most vulnerable to improve the quality of life for program participants. These qualifying populations require assistance transitioning to housing, short-term or long-term supportive services like case management, legal services, or other supportive services. These families will have a higher likelihood of becoming self-sustaining over time with better housing options and wrap-around services.

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

Other qualified population like households like veterans household or households who are at or below 50% AMI and experiencing housing problems will be eligible to receive rental assistance or supportive services. These families and individuals usually have a great risk of having housing instability. The City will fund eligible activities that also support the stabilization of these households, which will alleviate affordability challenges, overcrowding, and unsafe living conditions.

#### **HOME-ARP** Refinancing Guidelines

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

Not applicable

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

Not applicable

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

Not applicable

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

Not applicable

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

Not applicable

Other requirements in the PJ's guidelines, if applicable.

Not applicable

#### V. PUBLIC NOTICE

Notice of the proposed substantial amendment will be published in the Arkansas Democrat-Gazette on November 28, 2021. The 30-day comment period will be December 1, 2021-December 30, 2021. Written comments should be sent on or before December 30, 2021 to the following:

City of Little Rock Department of Housing and Neighborhood Programs Community Development Tracey Shine 500 West Markham, Suite 120W Little Rock, AR 72201

The Board of Directors of the City of Little Rock will conduct a public hearing on the substantial amendment at the Board's meeting at the Centre at University Park, 6401 West 12<sup>th</sup> Street on **Tuesday**, **December 21**, **at 6:00pm**. The substantial amendment due to HOME Reallocation and HOME-ARP will be presented for approve at the Board's meeting on **Tuesday**, **January 18**, **2022 at 6:00pm**.

