

INTRODUCED: March 13, 2023

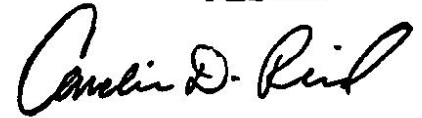
AN ORDINANCE No. 2023-088

To authorize the Chief Administrative Officer to submit a HOME – ARP Allocation Plan to the United States Department of Housing and Urban Development (HUD) for the receipt of Home Investment Partnerships – American Rescue Plan (HOME - ARP) Program funds in the amount of \$5,840,854.00.

Patron – Mayor Stoney

Approved as to form and legality
by the City Attorney

**A TRUE COPY:
TESTE:**



City Clerk

PUBLIC HEARING: MARCH 27 2023 AT 6 P.M.

THE CITY OF RICHMOND HEREBY ORDAINS:

§ 1. That the Chief Administrative Officer, for and on behalf of the City of Richmond, be and is hereby authorized and directed to submit a HOME – ARP Allocation Plan to the United States Department of Housing and Urban Development (HUD), in the form of the document attached hereto entitled “HOME – ARP Allocation Plan,” and dated March 31, 2023, for the receipt of Home Investment Partnerships – American Rescue Plan (HOME - ARP) Program funds in the amount of \$5,840,854.00.

§ 2. This ordinance shall be in force and effect upon adoption.

AYES: 9 NOES: 0 ABSTAIN: _____

ADOPTED: MAR 27 2023 REJECTED: _____ STRICKEN: _____



CITY OF RICHMOND

INTRACITY CORRESPONDENCE

O&R REQUEST

DATE: February 22, 2023

EDITION: 1

TO: The Honorable Members of City Council

THROUGH: The Honorable Levar M. Stoney, Mayor


THROUGH: J.E. Lincoln Saunders, Chief Administrative Officer *Sabrina Joy-Hogg* For Lincoln Saunders

THROUGH: Sabrina Joy-Hogg, Deputy Chief Administrative Officer for Finance and Administration *Sabrina Joy-Hogg*

THROUGH: Sheila D. White, Director of Finance *Sheila White*

THROUGH: Jason May, Director, Department of Budget and Strategic Planning

THROUGH: Sharon L. Ebert, Deputy Chief Administrative Officer for Economic Development and Planning

FROM: Sherrill Hampton, Director, Department of Housing and Community Development 

RE: Approval of The City's HOME-ARP Allocation Plan and its Submission to HUD

ORD. OR RES. No. _____

PURPOSE: To (i) approve the City's HOME-ARP Allocation Plan as it relates to the proposed use of the \$5,840,854 federal award and (ii) authorize the Chief Administrative Officer to submit the Plan to the U.S. Department of Housing and Urban Development (HUD) for their review and approval.

REASON: HUD requires that each jurisdiction receiving HOME-ARP funds develop and submit an Allocation Plan as it relates to the proposed utilization of the funds.

RECOMMENDATION: Approval is recommended by the City Administration.

BACKGROUND: In the Federal Fiscal Year 2021, HUD allocated the City of Richmond \$5,840,854 from its HOME Investment Partnerships – American Rescue Plan (HOME-ARP) Program. This one-time, formula-based funding is intended to help jurisdictions address homeless

assistance needs by creating or preserving affordable housing; providing tenant-based rental assistance; funding supportive services, including homelessness prevention services and housing counseling; or purchasing or developing non-congregate shelters. City Council accepted and approved the appropriation of the HOME-ARP federal award on January 23, 2023, as Ordinance 2023-010 (see **Attachment A**). To receive the \$5,840,854, the City must submit a HOME-ARP Allocation Plan for HUD's review and approval.

The City of Richmond and the counties of Henrico and Chesterfield are collaborating on a regional approach regarding the use of each jurisdiction's HOME-ARP funding based on the fact that housing insecurity is not a challenge that stops at jurisdictional borders. In a letter dated December 13, 2021, the three localities confirmed their intent to collaborate in efforts to reduce regional homelessness (see **Attachment B**). However, given HUD requirements, each locality must develop and submit a HOME-ARP Allocation Plan even if working collaboratively.

The City of Richmond's HOME-ARP Allocation Plan (see **Attachment C**) focuses on the creation of additional permanent supportive housing units. The data analysis and community stakeholder consultations conducted in collaboration with Chesterfield and Henrico counties revealed a significant need for permanent affordable housing for individual adults who are low-income, chronically homeless and living with disabling conditions. The availability of permanent supportive housing (PSH) is one of the best tools for helping to reduce the number of persons in shelters as well as those who may be unsheltered. The Plan explains the process that led to the conclusion and proposed use of the funds.

FISCAL IMPACT/COST:

- The adoption of the Allocation Plan would allow the City of Richmond to utilize the \$5,840,854 of HOME-ARP funds to further address the affordable housing needs of very low-income and homeless individuals, upon the review and approval of HUD.

FISCAL IMPLICATIONS: No negative fiscal implication.

BUDGET AMENDMENT NECESSARY: No

REVENUE TO CITY: No new revenue at this time.

DESIRED EFFECTIVE DATE: Upon Adoption

REQUESTED INTRODUCTION DATE: March 13, 2023

CITY COUNCIL PUBLIC HEARING DATE: March 27, 2023

REQUESTED AGENDA: Consent

RECOMMENDED COUNCIL COMMITTEE: Land Use, Housing, and Transportation

CONSIDERATION BY OTHER GOVERNMENTAL ENTITIES: None

AFFECTED AGENCIES: Department of Housing and Community Development

RELATIONSHIP TO EXISTING ORD. OR RES.: Ordinance 2023-010; "One Richmond: An Equitable Affordable Housing Plan" (Res. 2022-R008, adopted February 28, 2022); and "The City of Richmond Strategic Plan to End Homelessness 2020-2030" (Res. 2020-R031, adopted May 11, 2020).

REQUIRED CHANGES TO WORK PROGRAM(S): The activity will be added to HCD's staff work plans for implementation and monitoring.

ATTACHMENTS: **Attachment A** – Ordinance 2023-010 – Acceptance and Appropriation of the HOME-ARP Award from HUD and **Attachment B** - Collaboration Letter between Richmond, Henrico, and Chesterfield and **Attachment C** – City of Richmond HOME-ARP Allocation Plan.

STAFF: Sherrill Hampton, Director, Department of Housing and Community Development, Sherrill.Hampton@rva.gov or (804) 646-6822.



Department of Housing and Community Development

Main Street Station, 1500 East Main Street, Suite 300, Richmond VA 23219

HOME-ARP Allocation Plan

For Submission to HUD

*HOME Investment Partnerships –
American Rescue Plan (HOME-ARP) Program*

March 31, 2023

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Introduction

The City of Richmond is located at the crossroads of I-64 and I-95 along the fall line of the James River, one of the United States' most historic rivers. Richmond, the Capital of Virginia, has an estimated population of 229,233 (in 2020) according to the Census Bureau's Population Estimates Program (PEP), an increase of 13.6% since the 2010 Census. Richmond is located between Chesterfield County, immediately to the south with a population of 348,500 (Census ACS, 2020) and Henrico County, wrapping around the City to the east, north, and west with a population of 330,076 (Census ACS, 2020). Both of these surrounding counties have also grown in population over the last 10 years. As the core of a metropolitan area with a population of over 1.3 million (2020 Decennial Census), Richmond is home to many of the area's largest employers and most of the area's historic housing, cultural and recreational assets, and a key transportation hub. However, the City is not only separated from its neighbors by lines on a map, but also by the Code of Virginia provisions that leave cities and their surrounding counties independent of each other. As such, Richmond encounters problems not typically seen in cities of its size in other parts of the country. It is home to a large concentration of households with limited education, low income, and limited resources for securing safe, decent, and affordable housing.

The City of Richmond, Virginia is an entitlement community under the U.S. Department of Housing and Urban Development (HUD) for the following Federal programs:

- Community Development Block Grant (CDBG)
- HOME Investment Partnership (HOME)
- Emergency Solutions Grant (ESG)
- Housing Opportunities for Persons with AIDS (HOPWA)

Congress appropriated \$5 billion in funds under the American Rescue Plan (ARP) Act of 2021. These funds are to be used to assist the homeless and those persons and families who are at risk of becoming homeless. The U.S. Department of Housing and Urban Development (HUD) is administering this program and the City of Richmond was allocated \$5,840,854 in HOME-ARP funds.

The City of Richmond's Department of Housing & Community Development is the lead entity and the administrator for the HOME-ARP funds.

The City of Richmond partnered with Chesterfield and Henrico Counties to collaborate in the stakeholders consultation process. The group consultation process helped develop a more regional approach for the HOME-ARP Allocation Plan to meet the needs of the four (4) qualifying populations.

The City of Richmond prepared this HOME-ARP Allocation Plan to address its local needs and to establish priorities for the use of HOME-ARP funds. The City must submit its Allocation Plan to HUD by March 31, 2023. In order to determine the City's needs, interviews and video conferences were held with various housing providers, social service agencies, the Continuum of Care members, advocate agencies, etc. Agencies and organizations that serve all the qualifying populations were contacted and interviewed.

The Greater Richmond Continuum of Care (GRCoC) seeks to prevent, reduce, and end homelessness through effective and coordinated community-wide efforts and services. GRCoC coordinates homeless services and homelessness prevention across the City of Richmond, and the counties of Charles City, Chesterfield, Goochland, Hanover (including the Town of Ashland), Henrico, New Kent, and Powhatan.

HOME-ARP Eligible Projects/Activities:

The following projects/activities are eligible with the HOME-ARP funds:

- 1. Production or Preservation of Affordable Rental Housing**
 - Acquisition, construction of affordable rental housing for individuals and families that are part of the Qualifying Populations
 - Can include single family or multifamily housing, transitional or permanent housing, group homes, single room occupancy (SRO) units, and manufactured housing
- 2. Tenant Based Rental Assistance**
 - Providing payments to a tenant to cover housing and housing-related costs, including rental assistance, security deposit assistance, utility deposits, and utility payments to households that are part of the Qualifying Populations
- 3. Supportive Services**
 - Providing supportive services to members of the Qualifying Populations under three categories:
 - McKinney-Vento Supportive Services
 - Homelessness Prevention Services
 - Housing Counseling Services
- 4. Purchase and Development of Non-Congregate Shelter**
 - Acquisition, construction, or rehabilitation of non-congregate shelter units to service individuals and families that are part of the Qualifying populations

HOME-ARP Qualifying Populations:

The HOME-ARP Program has the following four (4) Qualifying Populations for this program:

- 1. Homeless**
- 2. At Risk of Homelessness**
 - An individual or family who is extremely low income (<30% AMI), does not have support networks, and meets at least one of the conditions for homelessness (24 CFR 91.5)
- 3. Fleeing, or Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking**
- 4. Other populations who do not qualify under any of the populations above but meet one of the following criteria:**

- Those who are currently housed due to temporary or emergency assistance or need additional assistance or services to avoid a return to homelessness
- Populations at Greatest Risk of Housing Instability
 - Households whose income is <30% AMI and are experiencing severe cost burden
 - Households whose income is <50% AMI and meet one of the criteria for being At Risk of Homelessness

In compliance with the HUD regulations, the City of Richmond has prepared a substantial amendment to its FY 2021 Annual Action Plan in order to submit the HOME-ARP Allocation Plan.

A “draft” of the FY 2021 Annual Action Plan - Substantial Amendment - HOME-ARP Allocation Plan was placed on public display on the City’s website at: <https://www.rva.gov/housing-and-community-development/public-documents>. The display period started on Friday, March 9, 2023 through Friday, March 24, 2023 for a 15-day display period. A Public Hearing was held on Wednesday, March 22, 2023 to present the proposed HOME-ARP Allocation Plan and solicit resident comments. Upon completion of the 15-day comment period, the City of Richmond submitted the FY 2021 Annual Action Plan - Substantial Amendment - HOME-ARP Allocation Plan to the U.S. Department of Housing and Urban Development through IDIS on or before Friday, March 31, 2023.

Consultation

Describe the consultation process including methods used and dates of consultation:

During the consultation process, the City of Richmond aimed to meet with as many of the stakeholders, agencies/organizations, and housing providers that are part of the following categories:

- The CoC serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs), and
- 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.

The HOME-ARP Consultation Milestones are the following:

HOME-ARP Consultation Milestones	
Consultation	July 2022 through March 2023
Newspaper Notice	March 9, 2023
On Display	March 10, 2023
Public Hearing	March 22, 2023 at 6:00 PM
Off Display	March 24, 2023

The City of Richmond partnered with Chesterfield and Henrico Counties to collaborate in the stakeholders consultation process. The group consultation process goal was to develop a more regional approach to meet the needs of the four (4) qualifying populations.

The City ran a newspaper notice in the "Nuevas Raices" on Tuesday, March 7, 2023 and in the "The Richmond Free Press" on Thursday, March 9, 2023. In the notice it states that the "Draft" HOME-ARP Allocation Plan was on public display for fifteen (15) days on the City’s website at: <https://www.rva.gov/housing-and-community-development/public-documents>.

The Public Hearing was held on Wednesday, March 22, 2023 at 6:00 PM to discuss the proposed HOME-ARP Allocation Plan and solicit resident comments on the Plan.

List the organizations consulted:

Agency/Organization Consulted	Type of Agency/Organization	Method of Consultation	Feedback
Regional Homeless Services Providers	Homeless Services Providers Fair Housing Organizations Domestic Violence Services Providers Public Agencies <i>See Table below for list of attendees.</i>	Two-Hour Virtual Listening Session conducted 12/01/2022	Service providers named building/rehabbing affordable rental housing as both the biggest need and the eligible activity that will most impact persons experiencing homelessness. Furthermore, participants stated that even when there are units available, not every landlord will accept housing vouchers, or the vouchers, even when able to go up to 130% of FMR, do not cover soaring rents in the region. Participants also stated that additional Permanent Supportive Housing (PSH) would positively assist those experiencing chronic homelessness and free up capacity in other parts of the system. Many participants view PSH as a “huge priority” that would “enable long-term change.” Folks also shared that any new permanent supportive housing programs should include supportive services that are customized to meet individual needs.
Regional Community Partners (beyond Homeless Service Providers)	Fair Housing Organizations Re-Entry Organizations Domestic Violence Services Providers Public Agencies <i>See Table below for list of attendees.</i>	Two-Hour Virtual Listening Session conducted 12/01/2022	Regional community partners said that building new and/or rehabbing affordable rental housing units, would make the biggest impact for our unhoused neighbors. Additional housing units also need to be truly affordable so that people with extremely low incomes can afford them. Participants also recognized that building and rehabbing these units would not be a short-term solution, but a longer-term, more permanent solution. Participants shared the need for education on landlord-tenant rights and financial literacy for members of the qualifying populations. Feedback around supportive services acknowledged that these are most effective when combined with affordable and accessible housing (vouchers, rental units, etc) as well as flexible funding to holistically address needs.
Individuals with Lived Experience	Individuals with Lived Experience with	In-person surveys	When asked which of the previously eligible activities would be most helpful, the majority of the respondents replied that more

	<p>Homelessness served through emergency shelter.</p> <p><i>See Table below for list of participants.</i></p>	<p>conducted on 12/15/2022 and 12/20/2022</p>	<p>accessible shelters are needed to be connected to housing access. Respondents stated an immediate need for shelter and safety is not being met by the resources that are currently available in the region. The next most referenced eligible activity was building long-term affordable housing. Many lamented that accessibility and safety in affordable housing is hard to find and can be dangerous to live in.</p>
<p>Greater Richmond Continuum of Care Executive Board</p>	<p>Continuum of Care</p> <p><i>See Table below for list of attendees.</i></p>	<p>Virtual Meeting held 12/27/2022</p>	<p>Lack of affordable units is preventing people from leaving shelters even with vouchers. Lack of identification and other qualifying documents is also a barrier to being able to access housing in a timely manner. The barriers to accessing housing further extends the length of time persons spend experiencing homelessness. Long-term, affordable, supportive housing is the best solution. Coordinated Entry should be used, access points should be increased and be more available to persons experiencing street homelessness.</p>
<p>Key State Partners</p>	<p>Virginia Department of Behavioral Health and Developmental Services</p> <p>Virginia Department of Housing and Community Development</p> <p>Virginia Housing (state housing finance agency, and Housing Choice Voucher Administrator)</p> <p><i>See Table below for list of attendees.</i></p>	<p>Virtual Meeting held 01/04/2023</p>	<p>The Commonwealth had a priority need to increase permanent supportive housing opportunities for the past decade, initially driven by the state’s Olmstead settlement (a mandate to ensure community integration in housing options for people with disabilities), as well as priority to address homelessness. This has led to new resources and program incentives to develop Permanent Supportive Housing (PSH) for people with Intellectual Disabilities as well as people with serious mental illness experiencing homelessness and unnecessary institutionalization. These efforts have been led by an interagency structure, with DBHDS, Virginia Housing, and DHCD as primary agency leads. While there has been some progress, there is a need to build community capacity and local resource commitments to ensure this will continue and be scaled to meet the needs of the qualifying populations. DBHDS PSH programs align with SAMHSA PSH fidelity standards, including adherence to optimizing choice, ensuring low barrier access, and a clear separation of housing and services. DHCD provides scoring preferences for projects that provide qualified PSH units (5 point</p>

			<p>increase on 100 point scale). Minimum of 1 unit, up to 5-8% depending on size of building. Priority populations are people exiting homelessness, ID/DD, or SMI. MOUs with a service organization for referrals are required to ensure they can fill those units in a timely manner. DHCD values leveraging of available local resources when assessing applications for state funding and prioritizes projects that come in with a reasonable mix of committed sources. Virginia Housing requires a 10% leasing preference for special populations within the Virginia LIHTC program. Additionally, Virginia Housing is pursuing allowing projects based on Housing Choice Vouchers (HCV) in their catchment area to address underutilization of vouchers due to the lack of housing inventory across the state.</p>
<p>Community Services Boards (Public behavioral health and developmental disability services agencies)</p>	<p>Local CSBs: Chesterfield County Community Services Board Henrico Mental Health and Developmental Services Richmond Behavioral Health Authority <i>See Table below for list of attendees.</i></p>	<p>Virtual Meeting held 01/04/2023</p>	<p>The regional community services boards stated that they are seeing an increase in housing need among criminal justice involved populations, and that homelessness in the region is being addressed by detaining persons experiencing homelessness in jail, increasing their justice involvement and therefore housing barriers. Additionally, they reported an increase in the number of individuals entering homelessness from state hospitals or other institutional settings. They would like to see the services/programmatic emphasis be on housing status rather than disability type in order to have more flexibility and better meet the needs of the populations served. Overall, there is a great need for low barrier, truly affordable housing stock that has considerations for multiple historically marginalized populations.</p>
<p>Department of Social Services</p>	<p>Regional DSS <i>See Table below for list of attendees.</i></p>	<p>Virtual meetings held 08/19/2022 & 01/09/2023</p>	<p>The regional DSS partners reported that the biggest need is affordable housing. There is a significant impact on individuals' ability to find housing due to wide-spread generational poverty. Many of the individuals seeking housing are having difficulty making payments or are behind on utilities and other bills, further preventing them from rental eligibility. The housing made available</p>

			<p>must be low barrier for historically marginalized populations and should be well integrated into the community and close to resources.</p>
<p>Richmond Redevelopment and Housing Authority</p>	<p>Public Housing Authority</p> <p><i>See Table below for list of attendees</i></p>	<p>Virtual Meeting held 01/11/2023</p>	<p>There are thousands of households on the waiting list now with over 10,000 people on the waiting list for one-bedroom units. Voucher utilization has been impacted by the lack of housing inventory, for single adults. Barriers such as documentation and accessibility prolong the time people spend in crisis. Specialty vouchers are usually paired with other service providers so they often have someone helping them overcome these barriers. People coming in without case managers often need more help and are not housed as quickly. RRHA is working with the Greater Richmond CoC to build a partnership on EHV and implement referrals and preferences for people identified through the CoC's Coordinated Entry System.</p>
<p>Key Stakeholders</p>	<p>Community Based Organizations</p> <p><i>See Table below for list of participants.</i></p>	<p>Online survey distributed via direct emails, blasted via the GRCoC Listserv, and distributed to all Listening Session attendees</p>	<p>Long-term, affordable housing, specifically, permanent supportive housing, was identified as the greatest need. It was reported that the community has been "saturated" with Tenant Based Rental Assistance (TBRA), but there are not enough housing units to utilize these vouchers (either due to tenant barriers, cost of rent, or landlord refusal to accept a voucher).</p>

Homeless Services Providers Listening Session Invitees (*denotes invited but did not attend)

Name	Agency	Type of Agency	QPs Served
Cara Kaufman	Henrico County Department of Community Revitalization	PJ Partner	N/A
Stephen Batsche	The Salvation Army Central Virginia	Homeless Services Provider	QP 1
Jonathan Penn	Chesterfield-Colonial Heights Social Services	Public Agency	All QPs
Lexie Haglund	CARITAS	Homeless Services Provider	QP 1
Donna Stallings	Housing Opportunities Made Equal of VA	Fair Housing Organization	All QPs
Katie Chlan	Richmond Behavioral Health Authority	Public Agency	QP 1
Sharonita Cousin	Virginia Supportive Housing	Homeless Services Provider, Veterans Services, Housing Developer	QP 1, 4
Erica Holmes	SJV - Flagler Housing and Homeless Service	Homeless Services Provider	QP 1, 2, 4
Kelly Green- Bloomfield	SJV - Flagler Housing and Homeless Service	Homeless Services Provider	QP 1, 2, 4
Katelyn Schoelles	SJV - Flagler Housing and Homeless Service	Homeless Services Provider	QP 1, 2, 4
Noah Page	YWCA Richmond	Domestic Violence Provider	QP 3
Katie Rhodes	YWCA Richmond	Domestic Violence Provider	QP 3
Kristin Riddick	Housing Families First	Homeless Services Provider	QP 1, 2
Karen O'Brien	CARITAS	Homeless Services Provider	QP1
Nathan Ruckman	Virginia Supportive Housing	Homeless Services Provider, Veterans Services, Housing Developer	QP 1, 4
Kelly King Horne	Homeward	Continuum of Care	QP 1, 2
Heather Fritz	EMS of Virginia	Private Services Organization	QP 2, 4
Cathy Easter	Safe Harbor	Domestic Violence Provider	QP 3
Marc Rene	Richmond Metro Habitat	Private Housing Provider	QP 4
Cory Richardson- Lauve	Virginia Home for Boys and Girls	Private Disability Services Organization	QP 4
Anita Bennett	Daily Planet Health Services	Homeless Services Provider	QP 1
Sarah Tunner	Daily Planet Health Services	Homeless Services Provider	QP 1
Jessica Sagara	Chesterfield County Department of Community Enhancement	PJ Partner	N/A
Sarah Chua	Chesterfield County Department of	PJ Partner	N/A

	Community Enhancement		
Cara Kaufman	Henrico County Department of Community Revitalization	PJ Partner	N/A
Rachael Thayer	Henrico County Department of Community Revitalization	PJ Partner	N/A
Lily Miller	(not reported)	N/A	N/A
*	Commonwealth Catholic Charities	Homeless Services Provider	QP 1
*	HomeAgain	Homeless Services Provider, Veterans Services	QP 1

Community Partners Listening Session Invitees (*denotes invited but did not attend)

Name	Agency	Type of Agency	QPs Served
Jovan Burton	Partnership for Housing Affordability	Regional Planning Org, Housing Resource Line Administrator	QP 2, 4
Kalisha Jackson	Housing Opportunities Made Equal of VA	Fair Housing Organization	All QPs
Ben Wong	OAR of Richmond	Private Organization, Re-Entry Assistance for Justice Involved Populations	QP 4
Donna Stallings	Housing Opportunities Made Equal of VA	Fair Housing Organization	All QPs
Brenda Hicks	Housing Opportunities Made Equal of VA	Fair Housing Organization	All QPs
Hana Yun	ACTS	Private Organization, Housing Services	QP 2, 4
Jonathan Penn	Chesterfield DSS	N/A	N/A
Nathan Ruckman	Virginia Supportive Housing	Homeless Services Provider, Veterans Services, Housing Developer	QP 1, 4
Julie Anderson	Virginia Supportive Housing	Homeless Services Provider, Veterans Services, Housing Developer	QP 1, 4
Karen Swansey	Virginia Boys and Girls Home	Private Disability Services Organization	QP 4
Leslie Beard	Partnership for Housing Affordability- Housing Resource Line	Regional Planning Organization, Housing Resource Line	QP 2, 4

		Administrator	
Marion Cake	Project Homes	Private Organization, Affordable Housing	QP 4
Shaniqua Faulk	Virginia Supportive Housing	Homeless Services Provider, Veterans Services, Housing Developer	QP 1, 4
Veronica Reid	Virginia Community Voice	Private Organization, Community Advocacy	All QPs
Andi MacDougall	(not reported)	N/A	N/A
Michelle Jones	Housing Opportunities Made Equal of VA	Fair Housing Organization	All QPs
Sharonita Cousin	Virginia Supportive Housing	Homeless Services Provider, Veterans Services, Housing Developer	QP 1, 4
Jessica Sagara	Chesterfield County Department of Community Enhancement	PJ Partner	N/A
Sarah Chua	Chesterfield County Department of Community Enhancement	PJ Partner	N/A
Luanda Fiscella	Henrico County Department of Community Revitalization	PJ Partner	N/A
Cara Kaufman	Henrico County Department of Community Revitalization	PJ Partner	N/A
Rachael Thayer	Henrico County Department of Community Revitalization	PJ Partner	N/A
*	Veterans Outreach	Veterans Services	QP 1, 2
*	DLW Veterans Outreach and Training Center	Veterans Services	QP 2, 4
*	Vietnam Veterans of America	Veterans Services	QP 2, 4
*	Moments of Hope	Veterans Services	QP 2, 4
*	HandUp Community Resource Center	Veterans Services	QP 1
*	Start By Believing	Domestic Violence Provider	QP 3

Survey with Persons with Lived Experience

Name	Type of Agency	QPs Served
Katya	Person with Lived Experience	QP1 & 3
Jazmine	Person with Lived Experience	QP1

Kris	Person with Lived Experience	QP1
Vicky	Person with Lived Experience	QP1
Telecia	Person with Lived Experience	QP1 & 3
Lillian	Person with Lived Experience	QP1, Other (Veteran)
Richard	Person with Lived Experience	QP1
Melvin	Person with Lived Experience	QP1, Other
James	Person with Lived Experience	QP1
Michael	Person with Lived Experience	QP1
Donavon	Person with Lived Experience	QP1
Thomas	Person with Lived Experience	QP1, Other (Veteran)
Rodney	Person with Lived Experience	QP1
Marcus	Person with Lived Experience	QP1

Interview with Greater Richmond Continuum of Care Executive Board

Name	Agency	Type of Agency	QPs Served
Kelly King Horne	CoC Board Member, Homeward	Continuum of Care Collaborative Applicant and HMIS Lead	QP 1, 2
Irene Zolotorofe	CoC Board Member, Virginia Commonwealth University	Healthcare: Injury and Violence Prevention	All QPs
Dr. P. Cook	CoC Board Member, Virginia Commonwealth University	Healthcare: Injury and Violence Prevention	All QPs
Katie Rhodes	CoC Board Member, YWCA	Domestic Violence	QP 3
Anette Cousins	CoC Board Chair, Community Foundation of Greater Richmond	Other	N/A
Matt Scaparro	CoC Board Member, Better Housing Coalition	Private Organization, Affordable Housing Developer	QPs 2, 4
Beth Vann-Turnbull	CoC Board Member, Housing Families First	Homeless Services Provider	QPs 1, 2
Sherrill Hampton	City of Richmond Department of Housing and Community Development	PJ Partner	N/A
Eric Leabough	Henrico County Department of Community Revitalization	PJ Partner	N/A
Rachael Thayer	Henrico County Department of Community Revitalization	PJ Partner	N/A
Cara Kaufman	Henrico County Department of Community Revitalization	PJ Partner	N/A

Interview with Key State Stakeholders (DBHDS, DHCD, Virginia Housing)

Name	Agency	Type of Agency	QPs Served
Kristin Yavorksy	DBHDS	Public Agency, Disability Services	QP 1, 4
Abby Boyd	Virginia Housing	Public Housing Authority	All QPs
Chloe Rote	DHCD	Public Agency, Affordable Housing Development	All QPs
Dan Cohen	Chesterfield County Department of Community Enhancement	PJ Partner	N/A
Jessica Sagara	Chesterfield County Department of Community Enhancement	PJ Partner	N/A
Sarah Chua	Chesterfield County Department of Community Enhancement	PJ Partner	N/A
Rachael Thayer	Henrico County Department of Community Revitalization	PJ Partner	N/A
Eric Leabough	Henrico County Department of Community Revitalization	PJ Partner	N/A

Interview with Regional Departments of Social Services-Chesterfield

Name	Agency	Type of Agency	QPs Served
Kiva Rogers	Chesterfield County DSS	Public Agency	All QPs
Danika Briggs	Chesterfield County DSS	Public Agency	All QPs
Lolita Moody	Chesterfield County DSS	Public Agency	All QPs

Interview with Regional Departments of Social Services-Henrico

Name	Agency	Type of Agency	QPs Served
Gretchen Brown	Henrico County DSS	Public Agency	All QPs
Eric Leabough	Henrico County Department of Community Revitalization	PJ Partner	N/A
Rachel Thayer	Henrico County Department of Community Revitalization	PJ Partner	N/A
Cara Kaufman	Henrico County Department of Community Revitalization	PJ Partner	N/A

Interview with Regional Community Services Boards

Name	Agency	Type of Agency	QPs Served
Katie Chlan	Richmond Behavioral Health Authority	Public Agency	QP 1, 2, 4
Doug Bilski	Chesterfield Community Services Board	Public Agency	QP 1, 2, 4
Michael Nielsen	Henrico Mental Health and Developmental Services	Public Agency	QP 1, 2, 4
Adam Seehaver	Chesterfield Community Services Board	Public Agency	QP 1, 2, 4
Daniel Rigsby	Henrico Mental Health and Developmental Services	Public Agency	QP 1, 2, 4
Karen Bowker	Chesterfield Community Services Board	Public Agency	QP 1, 2, 4
Rachael Thayer	Henrico County Department of Community Revitalization	PJ Partner	N/A
Cara Kaufman	Henrico County Department of Community Revitalization	PJ Partner	N/A
Jessica Sagara	Chesterfield County Department of Community Enhancement	PJ Partner	N/A
Sarah Chua	Chesterfield County Department of Community Enhancement	PJ Partner	N/A

Interview with Richmond Redevelopment and Housing Authority

Name	Agency	Type of Agency	QPs Served
Fatimah Hargrove	RRHA	Public Housing Authority	All QPs
Eric Leabough	Henrico County Department of Community Revitalization	PJ Partner	N/A
Rachael Thayer	Henrico County Department of Community Revitalization	PJ Partner	N/A
Cara Kaufman	Henrico County Department of Community Revitalization	PJ Partner	N/A
Sherill Hampton	City of Richmond Department of Housing and Community Development	PJ Partner	N/A
Sarah Chua	Chesterfield County Department of Community Enhancement	PJ Partner	N/A

Online Survey Participants

Name	Agency	Type of Agency	QPs Served
Martha Shephard	Henrico Area Mental Health	Public Agency	All QPs

	& Developmental Services		
Anita Bennett	Daily Planet Health Services	Homeless Services Provider	QP 1
Lexie Haglund	CARITAS	Homeless Services Provider	QP 1
Veronica Reid	Virginia Community Voice	Community Advocacy Organization	All QPs
Kelly King Horne	Homeward	Continuum of Care	QP 1, 2
Katie Chlan	Richmond Behavioral Health Authority	Public Agency, PSH Provider	QP 1, 2, 4
Nancy Kunkel	Board Secretary and Housing Steering Committee Member, RISC	Private Organization, Advocacy	Other
Ben Wong	OAR	Private Organization, Re-entry	QP 1, 2, 4
Matt Scaparro	Better Housing Coalition	Affordable Housing Developer	QP 2, 4

Summarize feedback received and results of upfront consultation with these entities:

The Chesterfield, Henrico, and Richmond HOME-ARP consultation process overwhelmingly revealed the following feedback for the need to increased permanent housing options across all four (4) HOME-ARP qualifying populations. In particular permanent housing for those persons with complex housing and supportive service needs, and lengthy histories of homelessness living in unsheltered and sheltered locations. The following consistent themes mentioned in the HOME-APR consultation process were:

- There is not enough affordable rental housing for people with no income to extremely low incomes (0-30% AMI) in the region
- When available, the majority of existing housing stock is not accessible to members of the qualifying population and therefore, increases the length of time individuals spend experiencing homelessness. This exacerbates and overwhelms the shelter system.
- Those with direct contact with the qualifying populations specifically stated that there is a need for Permanent Supportive Housing (PSH) in the region.
- Service providers indicate the number of individuals entering homelessness from institutional settings and/or cycling through local jails is increasing rapidly, and the acuity of the population is resulting in higher service needs, beyond current system capacity. Additionally, the acuity and vulnerability of the population experiencing homelessness in terms of complex health and disabling conditions was affirmed through data analysis.
- Of the stakeholders consulted, including the Public Housing Authorities operating in the region, it was highlighted that the need for tenant based rental assistance for members of the qualified population was a lower priority due to the lack of accessible housing inventory to pair with housing assistance vouchers.
- Some stakeholders, including members of the qualified population, expressed a need for shelter to address immediate needs, but the overall greatest need expressed was for more accessible and

affordable rental housing for people experiencing homelessness, including people residing in shelters. Members of the Qualified Populations shared that their immediate needs were not being met largely due to a lack of, or insufficient resources. Many noted that the housing options in the region have high barriers and the timeline to access the resources prevents some individuals from ever gaining access to permanent housing options.

Housing and homelessness organizations expressed the need for and support for Permanent Supportive Housing (PSH) and a regional approach to meeting these needs:

- Representatives from the Greater Richmond Continuum of Care stated that they would support a regional PSH effort by exploring options to expand Coordinated Entry access points and continued community collaboration with the Housing Resource Line to ensure low barrier access to those with the greatest housing and support services needs.
- Representatives from state housing and service partners (DBHDS, DHCD, Virginia Housing) identified the development of new PSH inventory as a state priority and have prioritized PSH unit development within their funding programs through a combination of required preferences and incentives.

Based on the feedback gathered by the Chesterfield, Henrico and Richmond community engagement it shows the greatest need is for new affordable permanent housing.

Public Participation

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: 3/9/2023***
- ***Public comment period: start date - 3/10/2023 end date - 3/24/2023***
- ***Date(s) of public hearing: 3/22/2023***

Describe the public participation process:

The City of Richmond held one (1) public hearing for consultation with City residents, non-profit agencies and/or organizations, the public housing authority, housing providers, Continuum of Care members, etc. on the "Draft" HOME-ARP Allocation Plan. During the public hearing, the City staff and the City consultants discussed the planning process in the development of the HOME-ARP Allocation Plan. This included the interviews, virtual conferences, and remarks made.

The public hearing notice for the City of Richmond HOME-ARP Allocation Plan was published in the Spanish newspaper, the "Nuevas Raices," on Tuesday, March 7, 2023 and in the "The Richmond Free Press" on Thursday, March 9, 2023.

The fifteen (15) day public comment period on the "Draft" HOME-ARP Allocation Plan was from Friday, March 10, 2023 through Friday, March 24, 2023. The City of Richmond placed the "Draft HOME-ARP Allocation Plan on the City's website <https://www.rva.gov/housing-and-community-development/public-documents>.

The City residents were able to provide additional comments, via email at Sherrill.Hampton@rva.gov or via phone at (804) 646-1766. Written comments were addressed to the City of Richmond's Department of Housing and Community Development, attention Ms. Sherrill Hampton, Director, 1500 E. Main Street, Suite 300, Richmond, VA 23219.

Describe efforts to broaden public participation:

The City of Richmond partnered with Chesterfield and Henrico Counties to collaborate in the stakeholders consultation process. The goal of the regional consultation process was to develop a more regional approach to meet the needs of the four (4) qualifying populations and to reach out to as many agencies and organizations as possible. In addition, this consultation process also included a survey of persons who had live experience.

To broaden public participation, the City of Richmond advertised that the Draft HOME-ARP Allocation Plan was on public display and the date and time of the public hearing on the Draft HOME-ARP Allocation Plan in two (2) local newspapers. One of the newspapers is in Spanish and the notice was displayed in Spanish to broaden the outreach of the Draft Plan. In addition, the Draft HOME-ARP Allocation Plan was posted on the City's website to make the Plan available to a larger audience.

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 recommendations will be included after they are received.

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

A summary of any comments or recommendations that were not accepted will be included after the comment period is concluded.

Needs Assessment and Gaps Analysis

*In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.*

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	256	84	193	193	0								
Transitional Housing	13	3	69	69	65								
Permanent Supportive Housing	349	111	693	693	2								
Other Permanent Housing	9	2	86	86	14								
Sheltered Homeless						259	353	61	43				
Unsheltered Homeless						0	85	7	6				
Current Gap										0	0	176	176

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	54,108		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	18,355		
Rental Units Affordable to HH at 50% AMI (Other Populations)	27,660		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		13,850	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		7,690	
Current Gaps			21,540

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

Based on the 2022 Point-In-Time Count, there were 697 homeless individuals identified in the Richmond/Henrico, Chesterfield, Hanover Counties CoC. Of those people experiencing homelessness, 466 (67%) were black, 179 (26%) were white, and the remaining 7% were Asian (3), American Indian or Alaskan Native (7), Native Hawaiian or Other Pacific Islander (1), and 41 identified as having multiple races. Additionally, 436 (63%) were male, 254 (36%) were female, and 7 (1%) identified as transgender or gender non-conforming.

Among the population of those experiencing homelessness, there was a large portion that were identified as severely mentally ill (176 individuals, which was 25% of the surveyed population) and another 12% identified as having chronic substance abuse issues (82 individuals).

The "Homeward 2022 Gap Analysis" estimated that the population in the City of Richmond experiencing homelessness for the period of April 1, 2021 through March 31, 2022 was 4,261 persons. Of this, 39.9% were families with children and 60.1% were adults not accompanied by children. Of the 4,261, 23.9% were children under the age of 18 years. Another 43.9%

were 25-54 years old and 23.7% were 55 and over in age. The racial breakdown of the homeless population is 82.8% of the population were Black/African American, 12.3% are white, and 4.9% are another race.

The Housing Resources Line for the time period of September 2020 through June 2022 received 6,000 calls from the City of Richmond residents of which 1,171 calls were for services to assist homeless needs.

At Risk of Homelessness as defined in 24 CFR 91.5

24 CFR 91.5 defines At Risk of Homelessness as an individual or family that has an annual income below 30% of the HUD area median family income, they do not have sufficient resources or support networks, and meets one of several other conditions. According to the most recently available CHAS data, 22,385 households (or 24.7% of the total population) live at 30% or below the HUD Area Median Income and of those 22,385 households: 17,050 have one or more housing problems, which includes either incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, or have a cost burden greater than 30%.

The Housing Resource Line for the time period of September 1, 2020 through June 30, 2022, received a total of 6,000 calls from the City of Richmond residents. The demographic characteristics of the callers to the Housing Resource Line are the following:

Family Composition:

- **1-person household** - 2,782 (58%)
- **2-person household** - 898 (19%)
- **3-person household** - 508 (11%)
- **4-person household** - 347 (7%)
- **5+ person household** - 291 (6%)

Household Annual Income:

- **< \$25,000** - 3,552 (77%)
- **\$25,000 - \$50,000** - 742 (16%)
- **\$50,000 - \$75,000** - 58 (1%)
- **> \$75,000** - 8 (0%)
- **Not disclosed** - 238 (5%)

Race/Ethnicity:

- **Black/African American** - 3,934 (71%)

- **White** - 543 (10%)
- **American Indian/Alaskan Native** - 24 (0%)
- **Asian** - 11 (0%)
- **Hispanic/Latinx** - 96 (2%)
- **Multi-Racial** - 157 (3%)
- **Undisclosed** - 801 (14%)

Age:

- **Under 17** - 1 (0%)
- **18 - 24** - 294 (8%)
- **25 - 34** - 724 (20%)
- **35 - 44** - 646 (18%)
- **45 - 54** - 621 (17%)
- **55 - 64** - 711 (20%)
- **65 - 74** - 422 (12%)
- **75 and over** - 101 (3%)
- **Not disclosed** - 86 (2%)

Gender:

- **Female** - 3,690 (65%)
- **Male** - 1,987 (35%)
- **Non-Binary** - 3 (0%)
- **Transgender** - 8 (0%)
- **Not Disclosed** - 28 (0%)

Other Characteristics:

- **Veteran** - 247 (4%)
- **1 or more Mental Health challenge** - 737 (13%)
- **Disability or Chronic Health Issue** - 243 (4%)

Based on the above statistics, the largest household composition served was single person households (50%) followed by two-person households (19%). There were 3,552 households or 77% with incomes less than \$25,000 per year. Racial and ethnicity showed that 71% of the households were Black/African Americans. Age ranged from 44% in the 25 to 44 age group of 52% were in the 45 and over age group. There were 65% of the persons who were female and 35% who were male. Interesting to note that only 4% were veterans.

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

During the 2022 Point-In-Time Count, there were 49 homeless individuals who were identified as victims of domestic violence in the Richmond/Henrico, Chesterfield, Hanover Counties CoC. Additionally, according to 2021 data from the Homeless Management Inventory System (HMIS), there were 198 having history of domestic violence; and 63 persons fleeing domestic violence, of which 23 were fleeing with children.

Stella P Data has 211 domestic violence survivors that are currently fleeing are experiencing homelessness. 458 domestic violence survivors and not currently fleeing or unknown fleeing status.

Based off the Partnership for Housing Affordability – Housing Resource Line for the time period of September 2020 through June 2022 they received 6,000 calls from residents in the City of Richmond. Of those calls 52 or 0.87% were from survivors of domestic violence.

EmpowerNet collects data from a 24/7 crisis hotline for all people fleeing or attempting to flee domestic violence, human trafficking and related situations of sexual or dating violence or harassment. During the time period of July 1, 2021 through June 30, 2022, 1,442 persons called the crisis hotline, of which 795 were from the City of Richmond. During this period of time 1,258 domestic violence victims received services. The characteristics of callers to the domestic violence hotline are the following:

Race/Ethnicity:

- **Black/African American** - 741 (51%)
- **White** - 428 (30%)
- **Asian** - 25 (2%)
- **Native American/Alaskan Native** - 16 (1%)
- **Hispanic** - 125 (9%)
- **Unknown** - 147 (10%)

Gender:

- **Female** - 1,330 (92%)
- **Male** - 93 (6%)
- **Transgender Identifies Female** - 11 (0.7%)
- **Transgender Identifies Male** - 2 (0.1%)
- **Other** - 6 (0.4%)

Other Characteristics:

- **Immigrant, Refugee, or Asylum Seeker** - 33 (2%)
- **Limited English Proficiency** - 35 (2%)
- **Disability** - 133 (9%)
- **Medical or Health Needs** (including pregnancy) - 44 (3%)
- **Experiencing Homelessness** - 110 (8%)
- **Incarcerated** - 16 (1%)

EmpowerNet reports that 54 calls they received stated they experienced sexual violence and 281 calls they received experienced domestic violence. These persons reported became homeless as a result of their experience. In addition, 114 calls stated they received sexual violence and 610 calls said they experienced domestic violence and reported having to relocate as a result of their experience. They received 569 calls requesting shelter or emergency housing services.

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

Those with disabilities are at greatest risk of housing instability. According to the most recent American Community Survey (ACS) data from 2021, there were 34,082 residents (15.2% of the total civilian non-institutionalized population) of the City of Richmond who have a disability. This shows that a significant portion of the City's population is at a high risk of housing instability.

Among others that are at greatest risk of housing instability, those who are at or below 30% of the HUD Area Median Income who are burdened by their monthly housing costs are at a higher risk of becoming homeless. According to the most recent CHAS data, 18,355 (35.4%) households in the City have incomes at or below 30% of the HUD AMI. 35,905 (39.8%) households in the City have a housing cost burden of greater than 30% of their income.

For households requiring services or housing assistance to prevent homelessness, there were 169 persons, which comprises 79 households assisted by rapid re-housing according to the Homeless Management Inventory System (HMIS).

Based off the Partnership for Housing Affordability – Housing Resource Line for the time period of September 2020 through June 2022 they received 6,000 calls from residents in the City of Richmond. Of those calls only 52 or 0.87% were from survivors of domestic violence.

The Richmond Redevelopment & Housing Authority has 3,499 units of public housing, 3,294 units of project-based vouchers, and 2,697 units of tenant-based vouchers. The public housing occupancy rate is 86% and the project-based utilization rate is 88%.

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 (Optional):

The City of Richmond has a variety of resources to assist households experiencing homelessness and at-risk of becoming homeless through Federal, State, and local programs. These programs range from emergency shelters for household's experience homelessness, through the development of affordable rental housing for extremely low-income and low-income households. Below is a summary of the resources available through the City of Richmond:

- **Community Development Block Grant (CDBG) Program:**

The City of Richmond is a federal entitlement grantee. In FY 2022 the City received \$4,474,570 of Community Development Block Grant (CDBG) funds. These funds are used for public service activities, owner-occupied housing rehabilitation, housing counseling, downpayment assistance, rental housing rehabilitation, and economic development activities. Funding is provided to agencies for services to the homeless and those who are at-risk of becoming homeless.

- **HOME Investment Partnership (HOME) Program:**

The City of Richmond, as a federal entitlement grantee, received \$1,764,354 in FY 2022 HOME Investment Partnership (HOME) funds. These funds are used for downpayment assistance programs; pre-purchase counseling, financial literacy, and homebuyer group education; the construction of new single family homes, and to develop rental housing for low and moderate income households. These funds help to provide housing counseling and development of affordable housing for owner and rental housing to combat those households who are at risk of becoming homeless or housing instability.

- **Emergency Solutions Grant (ESG) Program:**

The City of Richmond is also a federal entitlement grantee for the Emergency Solutions Grant (ESG) Program. In FY 2022 the City received \$384,355 of Emergency Solutions Grant (ESG) funds. These funds are being used for programs that provide homeless services, support, and housing assistance through the programs coordinated and provided by the

Greater Richmond Continuum of Care in an effort to end homelessness. In addition, funds are being used for emergency shelter, case management, rapid re-housing services, and provide ongoing operation of the Homeward Community Information System serving homeless population.

- **Housing Opportunities for Persons with AIDS (HOPWA) Program:**

The City of Richmond is also a federal entitlement grantee for the Housing Opportunities for Persons with AIDS (HOPWA) Program. In FY 2022 the City received \$1,794,492 of Housing Opportunities for Persons with AIDS (HOPWA) funds. These funds are being used to provide funding for housing related services for those with HIV/AIDS in the City of Richmond MSA. In addition, funds are being used to provide for tenant based rental assistance, emergency short-term mortgage assistance, utility assistance, and information referrals to address the needs of the homeless and persons who are at risk of becoming homeless.

- **Housing Inventory Count (HIC):**

The chart below is the Continuum of Care Housing Inventory Count (HIC) for 2022.

	Family Units	Family Beds	Adult Only Beds	Child Only Beds	Total Year Round Beds	Seasonal	Overflow/Vouchers	Subset of Total Bed Inventory		
								Chronic Beds	Veteran Beds	Youth Beds
Emergency, Safe Haven and Transitional Housing:	87	269	262	0	531	135	0	N/A	65	0
Emergency Shelter	84	256	193	0	449	135	0	N/A	0	0
Safe Haven	0	0	47	0	47	N/A	N/A	N/A	44	0
Transitional Housing	3	13	22	0	35	N/A	N/A	N/A	21	0
Permanent Housing:	113	358	779	0	1,137	N/A	N/A	N/A	494	2
Permanent Supportive Housing	65	181	586	0	767	N/A	N/A	266	450	0
Rapid Re-Housing	46	168	107	0	275	N/A	N/A	N/A	30	2
Other Permanent Housing	2	9	86	0	95	N/A	N/A	N/A	14	0
Grand Total:	200	627	1,041	0	1,668	135	0	266	559	2

The Richmond/Henrico, Chesterfield, Hanover Counties CoC has a total of 531 emergency, safe haven, and transitional housing beds and 1,137 units of permanent housing. Of those number of units, the CoC has 65 beds for veterans and 0 beds for youth under emergency, safe haven, and transitional housing. The CoC has 494 permanent housing beds for veterans, 2 beds for youth and 266 permanent supportive housing beds for the chronic homeless.

Based off the 2022 Continuum of Care Housing Inventory Count (HIC), there are 584 emergency shelter beds; 47 safe haven beds; 35 transitional housing beds; 767 permanent housing beds; 95 other permanent housing beds; and 275 rapid re-housing beds. These resources and supportive services are as follows:

- **Emergency Shelter:**
 - **CARITAS: Single Men's Emergency Shelter Case Management DHCD/VHSP Richmond & Henrico ESG-CV** - 36 beds
 - **CARITAS: Single Women's Emergency Shelter Case Management DHCD/VHSP, Richmond & Henrico ESG-CV** - 28 beds
 - **Commonwealth Catholic Charities: COVID Positive Isolation Shelter** - 2 beds
 - **Commonwealth Catholic Charities: Inclement weather Emergency Shelter** - 135 beds
 - **Commonwealth Catholic Charities: NCS Days Inn CHERP** - 233 beds
 - **DP Greater Richmond Medical Respite** - 10 beds
 - **Goochland Free Clinic/The Knight Owl** - 6 beds
 - **HSP Emergency Shelter** - 5 beds
 - **HA Espigh Family Emergency** - 31 beds
 - **HA Men's Emergency** - 20 beds
 - **Moments of Hope Hotels/Motels** - 17 beds
 - **Safe Harbor Emergency Shelter** - 4 beds
 - **Safe Harbor for Trafficking Survivors (ES)** - 3 beds
 - **SA Family Emergency Shelter** - 17 beds
 - **SA Singles Emergency Shelter** - 33 beds
 - **VHBG: Pride Place Emergency Shelter ESG-CV** - 4 beds

- **Safe Haven:**
 - **Daily Planet - HCHV/SH** - 6 beds
 - **Daily Planet - Safe Haven** - 3 beds
 - **Liberation Family Services - GPD beds** - 14 beds
 - **Liberation Family Services - GPD beds (19)** - 12 beds
 - **Liberation Family Services - GPD beds 21C** - 12 beds

- **Transitional Housing:**
 - **DP GPD - Safe Haven** - 13 beds
 - **HomeAgain: Veterans Transitional Program Non-GPD** - 8 beds
 - **RBHA: Residential Support for Homeless Families Transitional Housing (CDBG)** - 10 beds
 - **Safe Harbor (transitional - buildings 1 and 2)** - 4 beds

- **Permanent Supportive Housing:**
 - **Commonwealth Catholic Charities - TBRA - 46 beds**
 - **Flagler - Richmond Virginia Housing Trust PSH - 1 bed**
 - **HomeAgain - PSH (HUD) - 48 beds**
 - **Richmond Behavioral Health Authority - PSH beds - 16 beds**
 - **VA/Richmond Redevelopment and Housing Authority + Virginia Housing Development Authority - VASH Richmond - 437 beds**
 - **Virginia Supportive Housing: Richmond Homelink PSH - 90 beds**
 - **Virginia Supportive Housing: Richmond Housing First 1 - 36 beds**
 - **Virginia Supportive Housing: Richmond Housing First 2 - 12 beds**
 - **Virginia Supportive Housing: Richmond Housing First 3 - 66 beds**
 - **Virginia Supportive Housing: VSH Dfind - 11 beds**
 - **Virginia Supportive Housing: VSH Veteran's Apartments - 4 beds**

- **Other Permanent Housing:**
 - **Greater Richmond Continuum of Care - HandUp Community Resource Center: TIP - 14 beds**
 - **Virginia Supportive Housing: VSH FINDS - 13 beds**
 - **Virginia Supportive Housing: VSH New Clay SRO - 30 beds**
 - **Virginia Supportive Housing: VSH South Richmond - 38 beds**

- **Rapid Re-Housing:**
 - **Flagler: Community - 10 beds**
 - **Flagler: Youth Rapid Re-Housing - 2 beds**
 - **Flagler: Henrico Rapid Rehousing Henrico ESG-CV - 6 beds**
 - **Flagler: Richmond Fostering Futures Rapid - 1 bed**
 - **Flagler: Richmond Rapid Rehousing DHCD/VHSP - 10 beds**
 - **Hanover Safe Place: HSP rapid rehousing - 7 beds**
 - **HomeAgain: DHCD/VHSP RRH - 11 beds**
 - **HomeAgain: ESG RRH City - 3 beds**
 - **HomeAgain: Family Rapid Re-Housing - 13 beds**
 - **HomeAgain: Henrico RRH ESG - 6 beds**
 - **HomeAgain: Family Rapid Rehousing HUD - 23 beds**
 - **HomeAgain: Housing Trust Fund Richmond RRH - 4 beds**
 - **HomeAgain: Housing Trust Fund State Rapid Re-Housing - 6 beds**
 - **Homeward: EHV Rapid Rehousing CHERP - 72 beds**
 - **Housing Families First: ESG Richmond - 10 beds**
 - **Housing Families First: HUD Rapid Re-Housing - 19 beds**
 - **Housing Families First: Rapid Re-Housing (Internal Money) - 20 beds**

- **Housing Families First: VHSP Rapid Re-Housing** - 18 beds
- **Housing Families First: Rapid Re-Housing Henrico ESG-CV** - 4 beds
- **Virginia Supportive Housing: SSVF** - 30 beds

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Based on the 2022 Point-In-Time Count there was 513 households that were currently experiencing homelessness, 428 households were sheltered and 85 households were unsheltered. The unmet housing need for this qualified population is to increase the number of shelter beds and permanent supportive housing units. The number of shelter beds that turnover each month are filled immediately and the need outstrips the resources.

A minimum number of shelter beds are needed to meet the needs of the unsheltered in the City of Richmond. By having the City develop more affordable permanent supportive housing, this will remove the bottleneck at the emergency shelters level, since the length of stay in shelters has more than doubled.

The Homeward 2022 Gap Analysis emphasized the need for more affordable housing because the shelters are at capacity. Homeward proposed a way to increase the capacity is by developing more permanent supportive affordable housing and continue to advocate for permanent housing resources (i.e., RRH, PSH, and OPH).

The supportive services that are needed, include the following: child care, educational services, employment assistance and job training, food, housing searches and counseling services, legal services, life skills training, mental health services, outpatient health services, outreach services, substance abuse treatment services, transportation, case management, mediation, credit repair, services for special populations, and financial assistance.

The unmet housing need for this qualified population is to increase permanent supportive housing options and wrap around supportive services.

At Risk of Homelessness as defined in 24 CFR 91.5

The unmet housing needs of the at risk of homeless population is the lack of affordable housing units in the City. This refers to that qualifying population who live at 30% or below the HUD Area Median Income and have one or more housing problems. This qualifying

population needs short- and long-term rental and utility assistance, along with affordable permanent housing options.

According to the CoStar Group data, rents in the City of Richmond have increased from 2021 to 2022 first quarter by 14% and 21% for the Richmond Metro area. This increase in the rents has really affected this qualifying population since they cannot afford the rental increases.

The supportive services that are needed include the following: child care, educational services, employment assistance and job training, food, housing searches, counseling services, legal services, life skills training, mental health services, outpatient health services, outreach services, substance abuse treatment services, transportation, case management, mediation, credit repair, landlord/tenant liaison, services for special populations, and financial assistance costs.

The unmet housing need for this qualified population is to increase permanent supportive housing options and wrap around supportive services.

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

Based on the 2022 Point-In-Time Count, there were 49 homeless individuals who were identified as victims of domestic violence. Additionally, according to 2021 data from the HMIS, there were 198 having a history of domestic violence; and 63 persons fleeing domestic violence, of which 23 were fleeing with children.

Stella P Data has 211 domestic violence survivors that are currently fleeing and are experiencing homelessness. There are 458 domestic violence survivors who are not currently fleeing or are of unknown status.

Based off the Partnership for Housing Affordability – Housing Resource Line for the time period of September 2020 through June 2022 they received 6,000 calls from residents in the City of Richmond. Of those calls 52 or 0.87% were from survivors of domestic violence.

EmpowerNet collects data from a 24/7 crisis hotline for all people fleeing or attempting to flee domestic violence, human trafficking and related situations of sexual or dating violence or harassment. During the time period of July 1, 2021 through June 30, 2022, 1,442 persons called the crisis hotline, of which 795 were from the City of Richmond. During this period of time 1,258 domestic violence victims received services.

The supportive services that are needed are the following: child care, education services, employment assistance and job training, food, housing searches, counseling services, legal services, life skills training, mental health services, outpatient health services, outreach services, substance abuse treatment services, transportation, case management, mediation, credit repair, landlord/tenant liaison, services for special populations, and financial assistance costs.

The unmet housing need for this qualified population is to increase permanent supportive housing options and wrap around supportive services.

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 unmet housing and service needs for other populations who are at greatest risk of housing instability's supportive services is to help decrease their risk of housing instability by providing wrap-around services. These individuals may have a substance abuse, mental health issues, and physical disabilities. To prevent housing instability, they need long term permanent housing assistance with case management and wrap-around support services. In addition, another population that is experiencing instability is the physically disabled and the developmentally challenge. There is a need for long-term permanent housing that is accessible for these persons with disabilities.

The supportive services that are needed are the following: child care, education services, employment assistance and job training, food, housing searches, counseling services, legal services, life skills training, mental health services, outpatient health services, outreach services, substance abuse treatment services, transportation, case management, mediation, credit repair, landlord/tenant liaison, services for special populations, and financial assistance costs.

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

The City of Richmond's limited supply of affordable housing has created the largest gap in the system. This gap is much larger than the available resources that the City has, but the City will use the HOME-ARP funds to leverage other funds to spread the HOME-ARP funds out, as much as possible to develop as many new affordable housing options as possible to fill the need for the four (4) qualifying populations.

Based off the 2022 Point-In-Time Count (PIT), the CoC has 85 unsheltered homeless persons and 612 sheltered homeless. With the emergency shelter beds near capacity, this leaves 85 homeless persons living on the streets and waiting to access shelter beds. In addition, the CoC has its permanent supportive housing beds over 100% utilization rate.

To assist in meeting the need to provide permanent housing, the City works with the Richmond Redevelopment & Housing Authority for housing assistance through either public housing units or through Housing Voucher programs. The Richmond Redevelopment & Housing Authority has 3,499 units of public housing, 3,294 units of project-based vouchers, and 2,697 units of tenant-based vouchers. The public housing occupancy rate is 86% and the project-based utilization rate is 88%.

Based off the stakeholder consultation there is a need for more emergency shelters, affordable rental housing units, and wrap around supportive services. Common housing barriers mentioned were criminal background, credit history, rental history, evictions, etc. New affordable housing will need to be cognitive of these barriers and identify ways to reduce these barriers for its tenants.

In addition, stakeholders expressed the desire to have a one stop location to receive supportive services.

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:

The City of Richmond is not providing additional characteristics associated with instability and increase risk of homelessness in the City’s HOME-ARP Allocation Plan. Not Applicable.

Identify priority needs for qualifying populations:

During the HOME-ARP consultation, the following top priority needs for the qualifying populations were mentioned:

- Need for more affordable rental housing for persons with no income to extremely low income.
- Need for permanent supportive housing that is accessible to members of the four (4) qualifying populations.

- Need for accessible and affordable rental housing for people experiencing homelessness.
- The need for tenant based rental assistance for members of the qualified population was a lower priority due to the lack of accessible housing inventory to pair with housing assistance vouchers.
- Service providers indicate the number of individuals entering homelessness from institutional settings and/or cycling through local jails.

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:

The City of Richmond determined the level of need and gaps in the shelter inventory, housing inventory, and service delivery system from the following sources:

- Stakeholders' Consultations
- 2022 Point-In-Time Count (PIT)
- 2022 Housing Inventory Count (HIC)
- Homeward 2022 Gap Analysis
- EmpowerNet - Hotline Database
- Housing Resources Line – Hotline Database
- Stella P
- Homeless Management Information System (HMIS)
- HUD Housing Choice Voucher (HCV) Utilization Dashboard
- Homeless Management Information System (HMIS)
- SAGE HMIS Reporting Repository
- 2017-2021 American Community Survey Data (ACS Data)
- 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

The City of Richmond, Chesterfield and Henrico Counties collaborated to conduct a regional stakeholder consultation for the HOME-ARP Allocation Plan. This multi-jurisdiction approach was formed because homelessness and housing instability is more than just a City of Richmond issue. The solution to these needs, has to be done on a regional basis to understand the needs of the four (4) qualifying populations and develop a collective strategy to use the HOME-ARP funds to address the large gap in the supply of affordable housing.

HOME-ARP Activities

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

The City of Richmond proposes to solicit HOME-ARP applications from non-profit and for-profit agencies, private developers and/or social service providers to undertake eligible HOME-ARP projects/activities. The City will release a Notice of Funding Available under the HOME-ARP Program in the "The Richmond Free Press" and in the Spanish newspaper, "Nuevas Raices".

Potential applicants will be advised to look at the City of Richmond's Housing and Community Development Department webpage at <https://www.rva.gov/housing-and-community-development> to find the HOME-ARP Funding Request Application. The City's Housing and Community Development Department staff will send out the HOME-ARP Funding Request Applications to its list of agencies/organizations that have previously submitted funding requests or requested to be added to this list.

The City of Richmond's Housing and Community Development Department webpage will have the HOME-ARP Allocation Plan, HOME-ARP Funding Request Application, HOME-ARP Guidelines, Application Review Process, and instructions on how to complete the application.

The City will review the HOME-ARP Applications, rate and rank them to see which applications best address the needs identified in the HOME-ARP Allocation Plan. A review will be made of how the applicant plans to develop affordable housing units in the City. The City will also evaluate if the applicant will leverage the HOME-ARP funds with private and other public funding sources.

Describe whether the PJ will administer eligible activities directly:

The City of Richmond's Department of Housing & Community Development will manage the HOME-ARP program's administration, monitoring, and planning components. The projects/activities will be carried out by subrecipients which are awarded the HOME-ARP funds.

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

The City of Richmond has not provided any HOME-ARP funds to any subrecipient(s). The City in collaboration with Chesterfield and Henrico Counties hired, Corporation for Supportive Housing (CSH) to assist them with gathering the data and the regional consultations for the HOME-ARP Allocation Plan. CSH will not be responsible for administering the HOME-ARP Program.

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
Supportive Services	\$ 0.00		
Acquisition and Development of Non-Congregate Shelters	\$ 0.00		
Tenant Based Rental Assistance (TBRA)	\$ 0.00		
Development of Affordable Rental Housing	\$ 4,964,726.90		
Non-Profit Operating	\$ 0.00	0%	5%
Non-Profit Capacity Building	\$ 0.00	0%	5%
Administration and Planning	\$ 876,128.10	15%	15%
Total HOME ARP Allocation:	\$ 5,840,854.00	-	-

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

The City of Richmond developed the HOME-ARP Budget based on the identified needs from consultation with community stakeholders, agency surveys, the assessment of the data obtained from the Point-In-Time Count (PIT), Continuum of Care Housing Inventory Count (HIC), American Community Survey Data (ACS), HUD Comprehensive Housing Affordability Strategy (CHAS), and other statistical data provide from the CoC.

The City will allocate 85% of the HOME-ARP funds for the Development of Affordable Rental Housing and 15% of the funds for Administration and Planning.

Development of affordable rental housing is for the acquisition, construction, rehabilitation, development costs, relocation, and operating cost assistance/reserves. Administration and planning will set aside 15% of the allocation to cover the cost to administer the HOME-ARP program by the City of Richmond.

These allocations were derived from the data analysis and the key points that were articulated in the community stakeholders' meetings and interviews. It was overwhelmingly mentioned at the stakeholder meetings and interviews that there is a need for new development and preservation of affordable housing stock in the City of Richmond.

The City is not allocating HOME-ARP funds to Supportive Services, Acquisition and Development of Non-Congregate Shelters, Tenant Based Rental Assistance (TBRA), Non-Profit Operating, and Non-Profit Capacity Building based on the analysis of the needs for the City.

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 2022 Point-In-Time Count has 558 persons or 381 households in Emergency Shelters, 54 persons or 47 households in Transitional Housing, and 85 persons/households which are unsheltered.

The City of Richmond's housing market is seeing housing options being reduced because of the increase in housing sales prices, increase in monthly rents, low vacancy rates, and increases in utility costs. These trends are leading to the lack of affordable housing options and the increase of households becoming cost overburden. Based on the regional consultation process, the number one point that was repetitively mentioned over and over again was the lack of affordable housing options that served the four (4) qualifying populations.

By developing permanent affordable housing units for the qualifying population, will reduce the number of persons at the shelters, which will open up beds for the current unsheltered. In addition, this will help to provide these individuals with a more stable permanent housing environment, which will lead to more success with the wrap around services to assist these individual stay off the streets. This will reduce the drain on the service delivery system by moving individuals/households to a permanent environment.

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 City of Richmond estimates it will assist the development of twenty (20) new affordable housing units using the HOME-ARP funds. This number was developed by the City, based off the an estimated cost of \$250,000 per unit, which would cover the acquisition, construction, rehabilitation, development costs, relocation, and operating cost assistance/reserves. Additional units can be developed if applicants are able to leverage other funds as part of the HOME-ARP Application. The City as part of its application process will request applicants to leverage other funds as part of there application.

These will be new affordable units that will be available to all HOME-ARP qualifying populations because all four (4) qualifying populations needs are greater than the amount of HOME-ARP funds allocated to the City.

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

The City of Richmond is looking to leverage the HOME-ARP funds with other Federal, State, local, private, foundation etc. funding sources. The goal of the City is to use these other funding sources to develop at least twenty (20) affordable housing units or more, depending on the amount of funds the HOME-ARP subrecipient can leverage from other sources. If other funds are not available, the City will fund projects with only HOME-ARP funds.

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:

The City of Richmond does not intend to give preference to one qualifying population versus another because there is a need for aid among all four (4) qualifying populations. The needs for all four (4) qualifying populations is greater than the amount of HOME-ARP funds the City has been allocated.

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:

Not Applicable.

Referral Methods

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):

The City of Richmond intends to use the Continuum of Care Coordinated Entry System (CE) and the Housing Resource Line for its HOME-ARP projects and activities. These referral methods will serve all four (4) qualifying populations and will also make sure that none of the qualifying populations are left out.

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):

The City of Richmond is going to use the Continuum of Care Coordinated Entry System (CE) and the Housing Resource Line to make sure that all of the four (4) qualifying populations will be served. The Coordinated Entry System will be used to assist all four (4) qualifying populations. To help support the Coordinated Entry System the City is also going to use the Housing Resource Line in particular to assist the qualifying populations: at risk of homelessness and the other populations who do not qualify under any of the populations above but meet one of the following criteria: those who are currently housed due to temporary or emergency assistance or need additional assistance or services to avoid a return to homelessness; or populations at greatest risk of housing instability.

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):

The City of Richmond prioritizes households experiencing homelessness within the City's geographic area for referral to housing and supportive services. Priorities are consistent with CoC and ESG written standards approved by the City.

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):

The City of Richmond will prioritize the Coordinated Entry System (CE) Process, but will use the Housing Resource Line as an additional option to broaden the assistance the City offers using the HOME-ARP funds.

Limitations in HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

The City of Richmond is not intending to limit funding for HOME-ARP rental housing projects to a particular qualifying population or specific subpopulation. The need for affordable rental housing is consistent for all four (4) qualifying populations. The City will solicit proposals for rental housing projects in general. Evaluations of applications will be made and selections will be based on the best proposal submitted.

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:

The City of Richmond does not intend to implement any limitations with its HOME-ARP Program. Not Applicable.

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

The City of Richmond does not intend to implement any limitations with its HOME-ARP Program. Not Applicable.

HOME-ARP Refinancing Guidelines

The City of Richmond does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. Not Applicable.

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

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.

Appendix

Attached are the following items:

- Citizen Participation Documentation



Citizen Participation Documentation
