

City of Bellingham (WA) HOME-ARP Allocation Plan

Consultation

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

A survey was published on 3/4/22, soliciting public feedback on where and how the City of Bellingham (“City”) should allocate its HOME- ARP funding award to various members of the public, including staff representatives for various non-profit housing developers, non-profit service providers, the housing authority, other governmental agencies, and other community organizations. This survey was held open for 21 calendar days, and closed on 3/25/22.

These survey responses were catalogued and utilized to inform the City’s draft allocation plan, which was then published to the City website on 3/31/22, for a period of 15 calendar days (upon which members of the public were invited to submit public comments on the draft plan).

Targeted outreach was made to solicit survey and public comment feedback from members of: various diversity-focused and human rights organizations in the community, including the Whatcom Dispute Resolution Center, Whatcom Human Rights Taskforce, the Multicultural Center on Western’s campus, Community 2 Community Development (the foregoing listed did not respond to the City’s request for feedback on either the initial survey or the draft allocation plan); and Unity Care Northwest, SeaMar Community Health Center (both of whom responded to the City’s initial survey and whose feedback is included in the comments received as written in this document); housing and services providers and the local public housing authorities (see list in the table); Whatcom County (the local CoC agency), specifically Health Department staff working on homelessness and veteran’s services; Domestic Violence and Sexual Assault Services of Whatcom County (DVSAS); and agencies serving those with disabilities, including Max Higbee Center and Northwest Regional Council (NWRC). These specific agencies were notified about the City’s desire to engagement with them on these issues, the survey opportunity and the availability of the draft plan, and the opportunity to comment.

List the organizations consulted:

Agency/OrgConsulted	Type of Agency/Org	Method of Consultation	Feedback
Opportunity Council	Non-profit housing developer and homeless service provider	Email and Survey	Included in an anonymized survey result, see comments received as documented elsewhere in this plan.
Lydia Place	Homeless service provider	Email and Survey	Included in an anonymized survey result, see comments received as documented elsewhere in this plan.
Northwest Youth Services	Homeless service provider for youth	Email and Survey	Included in an anonymized survey result, see comments received as documented elsewhere in this plan.

Domestic Violence and Sexual Assault Services of Whatcom County	Domestic violence service provider	Email and Survey	Included in an anonymized survey result, see comments received as documented elsewhere in this plan.
YWCA Bellingham	Homeless service provider	Email and Survey	Included in an anonymized survey result, see comments received as documented elsewhere in this plan.
Catholic Community Services	Non-profit housing developer	Email and Survey	Included in an anonymized survey result, see comments received as documented elsewhere in this plan.
Mercy Housing Northwest	Non-profit housing developer	Email and Survey	Included in an anonymized survey result, see comments received as documented elsewhere in this plan.
Bellingham/Whatcom County Housing Authority	Public housing authority	Email and Survey	Included in an anonymized survey result, see comments received as documented elsewhere in this plan.
Whatcom County	Continuum of Care (CoC) / Public agencies that address the needs of the qualifying populations	Email and Survey	Included in an anonymized survey result, see comments received as documented elsewhere in this plan.
Other organizations (including Whatcom Dispute Resolution Center, Whatcom Human Rights Taskforce, the Multicultural Center on Western’s campus, Community 2 Community Development, Max Higbee Center, Northwest Regional Council)	Organizations that address fair housing, civil rights, and the needs of persons with disabilities.	Email and survey	See details on feedback and responses above.
Community Development Advisory Board	Public Advisory Group	Survey and Public Hearing	CDAB recommended we focus on the following populations: <ul style="list-style-type: none"> • Priority 1 – populations at-risk of homelessness • Priority 2 – “other populations” who providing supportive services would prevent the hh’s entry into homelessness (which we at the City have chosen to define as hh earning between 30%-50% of the area median income, who are ALSO rent burdened, who ALSO have a child(ren) present in the home) • Priority 3 – households currently experiencing homelessness In addition to these three qualifying

		<p>populations as outlined by HUD, CDAB recommends that we focus this funding on seniors and families with children across all three categories.</p> <p>CDAB recommended we focus on the following activities:</p> <ul style="list-style-type: none"> • Priority 1 – supportive services for the qualifying populations • Priority 2 – development of permanent affordable housing for qualifying populations • Priority 3 – non-congregate shelter for the qualifying populations <p>The group also recommended that the City focus on projects that could be completed quickly, where this funding could be expended quickly.</p>
--	--	--

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

Feedback received is documented elsewhere in this plan, which details survey responses received by members of the public and members of this organization.

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: 3/31/2022 (publication in Bellingham Herald)*
- *Public comment period: start date - 3/31/2022 end date - 4/18/2022*
- *Date(s) of public hearing: 4/14/2022*

Describe the public participation process:

The public participation process was initiated by the release of a public survey on 3/4/22. The intention of this survey was to solicit feedback on where and how the City should allocate its HOME-ARP funding award and was distributed to at least 135 members of the public, including staff representatives for various non-profit housing developers, non-profit service providers, the housing authority, other governmental agencies, and other community organizations (see a full list of organizations consulted in the survey process above).

The survey made available to the public included information on the “range of activities the PJ may undertake.” The public was provided with information on all the eligible activities that may be funded with HOME-ARP funds (i.e., rental housing, non-congregate shelter, tenant-based

rental assistance, and supportive services), regardless of whether the City intended to propose or plan to use HOME-ARP funds for only certain eligible activities.

The survey released was open for a period of 21 calendar days and closed on 3/25/22. Survey responses were catalogued and utilized to inform the City's draft allocation plan. The draft HOME-ARP Allocation plan was then published to the City website on 3/31/22 for a period of 15 calendar days (upon which members of the public were invited to submit public comments on the draft plan).

An announcement was made in the Bellingham Herald announcing to the public the release of the draft allocation plan on the City of Bellingham website and inviting members of the public to attend a public hearing on the draft plan and submit comments. Additionally, announcements were made at various public Coalition meetings alerting members of the public that the draft HOME-ARP Allocation plan had been published and that the City was now accepting public comments on the plan.

On 4/14/22, a public hearing was held to solicit public comment on the draft allocation plan, as published on the City of Bellingham website. This public hearing was held at the Community Development Advisory Board Meeting at 6:00pm. In the published notice of the public hearing, it was made clear that any member of the public who needed special accommodation or assistance in attending or participating in the meeting would be provided such. At the public hearing on 4/14/22, no members of the public were in attendance to offer comments on the draft HOME-ARP Allocation Plan. A robust discussion of the draft plan was held by members of the CDAB committee.

The public participation process soliciting comment on the draft allocation plan was closed on 4/18/22. No written comments were submitted by members of the public, despite wide notice that the public comment period was open.

Describe efforts to broaden public participation:

In order to solicit public comments to inform the drafting of the HOME-ARP allocation plan, a survey was created and distributed to members of the public and members of community organizations soliciting their feedback on where the HOME-ARP funding should be allocated, and what target populations should be prioritized with this funding.

Upon outreach to members of the public soliciting their feedback in this survey, it was made clear that accommodations would be made to members of the public who needed accommodations or translation services in order to complete the survey.

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

The responses received by the public via the initial public survey varied across a variety of outcomes desired and populations that were recommended to be targeted. Members of the public were asked specifically how they believe the HOME-ARP funding should be allocated. Some examples of public comment received on this topic are:

“Emergency shelter, permanent supported housing, and permanent housing that is NOT housing first for our more vulnerable people who would not thrive in the housing first model.”

“Acquisition and Development of non-congregate shelter for families with children experiencing homelessness; supportive services inclusive of case management; TBRA; youth-specific shelter.”

“AFFORDABLE rental housing development (emphasis on affordable). There is a shortage of rentals that are available, and what is available is out of reach/unrealistic for the target population.”

Additional comments outlined a desire from the public to see the HOME-ARP funding support affordable housing development, noncongregate shelter facilities, supportive services, tenant-based rental assistance, permanent supportive housing, and mental health resources.

Members of the public had a variety of opinions on which populations should be supported by HOME-ARP funding. Some examples of comments received by the public regarding which populations should be targeted with this funding:

“Vulnerable families and single people experiencing homelessness, because they are at the highest risk. They need case management and support to ensure the reasons leading up to becoming homeless are addressed. Serving families with children is an opportunity to intervene and reduce risk to child development. Homeless youth also need shelter resources with supportive services. Chronically homeless singles are also vulnerable, in terms of risk of death and serious health problems.”

“Children. anyone who has children. because the trauma children face through homelessness leads to generational cycles and constant crisis intervention.”

“People at-risk or experience homelessness; this subgroup will naturally include people fleeing DV and veterans, while capturing all others not in those categories.”

Additional populations the community identified as should be prioritized with this funding are individuals who identify as queer, single adults, veterans, and people of color, youth and young adults, transgender and gender-nonconforming individuals, and individuals fleeing domestic violence.

No additional comments were made during the course of the comment period.

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

No comments received by the public were not accepted by the City.

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	#	375	#	#								
Transitional Housing	210	#	43	#	#								
Permanent Supportive Housing	108	#	366	#	#								
Sheltered Homeless						91	341	23	#				
Unsheltered Homeless						5	188	14	#				
Current Gap										#	#	#	#

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	32,295		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	330		
Rental Units Affordable to HH at 50% AMI (Other Populations)	418		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		6,115	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		5,010	
Current Gaps			3,200

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:

Please note that the tables above (Homeless Needs Inventory and Gaps Analysis Table and the Housing Needs Inventory and Gaps Analysis Table) were population using the following data sources:

- Point in Time Count (PIT) data
- Continuum of Care Housing Inventory Count (HIC) data
- Comprehensive Housing Affordability Strategy (CHAS) data
- City analysis of its own records

Homeless as defined in 24 CFR 91.5

1a. Homeless

The most recent Whatcom County Point in Time Count (2021) identified 859 individuals experiencing homelessness. These 859 persons comprised 625 households. Of the 625 homeless households counted, 513 (82%) were unaccompanied persons. There were 16 (3%) family households with more than one person but without children. Families with children accounted for 96 households (15% of total households). Of the households with children, 65 were single-parent families and 31 families had both parents present. In addition, four households comprised of unaccompanied minors were counted in 2021.

Homeless persons were pretty evenly divided across gender (males 53%, females 42%, and gender nonconforming < 1%), and represented a wide range of ages (with the median age being 36 years). Children under 10 years old accounted for 14% of all identified individuals, and another 8% were between 10 and 17 years old. Together, children under the age of 18 accounted for more than one in five of all individuals counted.

The 2021 Point in Time count surveys show that only 60% of the respondents experiencing homelessness told surveyors that they identify as white and non-Hispanic, even though this demographic makes up more than 80% of the county's population. A relatively high proportion of individuals identifying as American Indian or Alaskan Native (9%), individuals identifying as Hispanic/Latino (11%), and individuals identifying as Black or African American (5%) experience homelessness in our community. Of the 859 persons counted this year, 641 slept in shelters or transitional housing facilities, and the other 218 were unsheltered.

Seniors – The most recent Point in Time identified that of the 859 homeless persons in Whatcom County, approximately 43 individuals were 65 years of age and older. Anecdotally, homeless outreach providers in the community have expressed that seniors comprise the second fastest growing subpopulation of individuals entering into homelessness.

At Risk of Homelessness as defined in 24 CFR 91.5

1b. At-risk of homelessness

Nearly 6,115 renter households in Whatcom County have a household income of 30% of the area median income or below and currently have 1 or more housing problems, as defined by HUD (including cost burden). Of these households, 75% identify as White, 2% identify as Black or African American, 4% identify as Asian American, 3.5% identify as American Indian or Alaskan Native, and 10% identify as Hispanic (any race). Anecdotally, we have heard from housing and homeless service providers that this cohort is the underserved in the community on the services side.

Seniors

Of the 6,115 renter households in Whatcom County with a household income of less than or equal to 30% of the area median income who purport to have at least 1 housing problem (including cost burden), 155 of these households are classified as an elderly non-family (meaning that there are 2 persons in the household and either one or both are age 62 or older). Of these 6,115 households at-risk of homelessness, 1,005 households are classified as an elderly non-family (meaning that these households are comprised of 1 or 2 persons and are non-family households with either person in the household person 62 years of age or older). Taking these two data points together, we assume that there are 1,160 households in Bellingham at-risk of homelessness with a senior present in the household.

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

1c. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking -

Survivors of domestic violence continue to need supports in the City of Bellingham. The last Consolidated Plan indicated 2,509 unique individuals received supportive services from the community's local domestic violence support network, the Domestic Violence and Sexual Assault Services (DVSAS). It is unknown the exact number of households fleeing human trafficking in the PJ; however, it is known that human trafficking is rising on an alarming scale nationally, with about 21 million victims worldwide (with 54% of victims being trafficked into sexual exploitation, and 38% of victims trafficked into forced labor).

Trafficking is common along the I-5 freeway, which intersects the City of Bellingham.

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

1d. "Other" populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

According to CHAS data, the "other" populations, as defined by HUD in the notice (see Section 7 below for a full definition), there are 7,910 households in renter-occupied housing making less than 50% of the Area Median Income. Of these households, 7,025 households experience at least 1 of the 4 housing problems as defined by HUD.

Families with Children

According to the most recent Comprehensive Housing Affordability Strategy (CHAS) data, there are a little over 1500 households in renter-occupied housing making less than or equal to 50% of the area median income, with a child under the age of 6 years old present in the home.

Veterans and Families that include a Veteran Family Member

There are roughly 14,360 veterans in Whatcom County, according to the most recent US Census.

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):

2a. Homeless

Currently a number of supports across a variety of interventions exist for populations experiencing homelessness. Emergency drop-in shelter options are available for single adults experiencing homelessness at both Base Camp (200 beds) and the Northwest Youth Services Young Adult Winter Shelter (10 beds). Additionally, DVSAS runs 38 units across two shelters for survivors fleeing domestic violence, and NWYS runs the PAD shelter for youth between the ages of 13 and 17 years of age.

A variety of interim housing options are available for both single adults, adult families, and families with children, as well as specific interim housing tailored to specific populations. Here is a broad breakdown of the interim housing offered in our community to homeless households:

- Swifthaven and Unity Village tiny home villages operated by HomesNow offering 45 total interim housing beds in microunit domiciles across two villages
- Gardenview tiny home village operated by Low Income Housing Institute and Road2Home offering 29 total interim housing beds in microunits
- Lighthouse Mission Ministries' Agape program offering 8 units of interim housing specifically for women and women with children
- Lighthouse Mission Ministries' Ascent program, offering 43 beds of interim housing specifically for adult men in recovery from SUDS
- Lydia Place's Gladstone campus, offering 5 units of interim housing specifically for women with children
- NWYS's Husly Shelter offers 4 units of interim housing for young adults between 18 and 24 years of age
- Sun Community Services' offers 9 units of interim housing for adults with mental illness and a history of institutionalization at its Sun House project

- The YWCA offers 41 beds of transitional housing specifically to women across three programs

Every City-funded intervention available to serve households experiencing homelessness participate in the CoC's Coordinated Entry System. This is a system that connects homeless people to the most appropriate housing solution based on their needs, which is determined upon housing intake into CE. The U.S. Department of Housing and Urban Development requires all projects funded under Continuums of Care (CoC) and to utilize Coordinated Entry.

2b. At-risk of homelessness

A scant number of resources exist specifically targeted to populations' who are at-risk of homelessness. The Opportunity Council offers limited financial assistance for rent and utilities to households at risk of homelessness. Additionally, two organizations in the community (LAW Advocates and Northwest Justice Project) offer free legal representation of tenants facing eviction. Finally the Whatcom Dispute Resolution Center (WDRC) provides impartial case management, conciliation, and mediation for tenants and landlords in eviction situations.

2c. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Currently the primary resource that exists in our community to serve the needs of victims fleeing domestic violence is the organization Domestic Violence and Sexual Assault Services (DVSAS), which provides safe emergency shelter, advocacy counseling, legal assistance, referrals, and a 24-hour helpline for victims of domestic violence. In addition, the Whatcom County Commission Against Domestic Violence provides outreach, awareness building, and trainings to the community.

At last count (the most recent Consolidated Plan published by the City) there are 166 beds in the city available to victims of domestic violence. Not all of these beds are exclusively designated for those fleeing domestic violence. Some are available for women and children who are facing homelessness for other reasons, and often have domestic violence in their backgrounds.

Resources that exist in the community to serve households fleeing human trafficking include the Engedi Refuge House, which offers 6 beds for victims of human trafficking.

2d. "Other" populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

Currently, the "other" populations as defined in the HUD notice (this is further outlined in Section 7 below) are served through resources as outlined in Section 2b. above.

Families with Children

Families with children at-risk of homelessness are similarly served through the resources outlined in Section 2b. above.

Veterans and Families that include a Veteran Family Member

There are a number of resources available to support and subsidize housing specifically for veterans, including SSVS, VASH, and VA Subsidized Housing. It should be noted, however, that these resources are tied to the veteran, and are all tenant-based resources. No veteran-specific project exists in Whatcom County, developed specifically to cater to the needs of veterans experiencing homelessness.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

3a. Homeless

On the services and emergency housing intervention side, there is an unmet need in the form of drop-in shelters specifically serving families with children. In the community at present there are only drop-in shelters catering to single adults and adult families. The largest drop-in shelter in

the community is a congregate facility containing 200 beds, which is not an appropriate physical layout for serving homeless families with children, or seniors who have higher vulnerabilities.

An additional complication, explained further in section 3b., is the lack of availability of affordable housing to those making less than 30% of the area median income. The lack of affordable housing stock creates complications on the services and rapid re-housing side. Anecdotally, services providers report that it is difficult to find available affordable housing to move the homeless households they case manage into. This results in households languishing in emergency shelter for a longer period of time, and creates a logjam of households waiting to enter into interim housing options.

At Risk of Homelessness as defined in 24 CFR 91.5

3b. At-risk of homelessness

The most recent Consolidated Plan for the City of Bellingham identified a significant lack of access to affordable housing for households making less than 30% of the area median income. These households have the most severe rates of cost burden in the community, and are the most vulnerable to housing costs. Inversely, the amount of housing stock available to those making less than 30% AMI is scarce; The vacancy rate for rental housing in Bellingham sits at less than 2% and is even lower for more affordable rental housing units.

Households who are rent burdened often find themselves in a precarious position; rents are steadily increasing in the community, and the availability of affordable housing is scarce. A recent data point provided by a community provider, the Opportunity Council, in their recently published Community Needs Assessment found that survey respondents (who are comprised mostly of low-income households expressed less confidence in their ability to pay housing costs when compared to statewide findings of the Census Pulse Survey.

The diversion resources for households at-risk of homelessness are scant in this community. These resources are further outlined in Section 2b.

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

3c. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

Currently there are resources in place to provide both emergency shelter and interim housing to survivor's of domestic violence, discussed more in Section 3c. However, as noted above in Section 3b., the lack of available affordable housing in the community to those making less than or equal to 30% of the area median income complicates efforts to rehouse survivors of domestic violence, and help these households move out of the shelter system and into permanent housing.

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

3d. "Other" populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

"Other" populations, as defined in the HUD notice (see Section 7 below for a full definition), are in need of a greater allocation of resources to meet their housing needs. Lack of affordable housing is felt most acutely by households making less than or equal to 50% of the Area Median Income; many households at 50% AMI can be categorized as severely cost-burdened. The most recent Consolidated Plan notes that "at least 63% of all households earning less than 50% AMI are paying more than half their income towards housing... the rise in housing costs, together with historically low vacancy rates and stagnant wages, makes it very difficult [for low-income households] to find affordable housing."

This need still persists five years on; it is still common for households making below 50% of the Area Median Income to allocate a majority of their take-home wages towards housing costs, and the availability of affordable housing is still scarce in today's market (see note in Section 3b.).

Families with Children

This population are also unmet in terms of services and housing options offered in the community to meet their needs. Families with children present in the home, where household income is less than or equal to 50% of the area median income are a population that were of special note in the most recent Consolidated Plan published by the City of Bellingham. The plan notes:

"Families with young children, and especially single-parent families, are particularly at risk of being priced out of Bellingham. Many struggle to find adequate housing and affordable childcare within the city and in close proximity to jobs and schools. Single-parent families are especially vulnerable to increasing housing costs: 51% are below the Federal poverty level."

Unfortunately, the same sentiment is true five years on; there is still a lack of access to affordable housing available for families making less than 50% of the area median income (see note in section 3b.), and a general lack of supportive services for families who are cost-burdened, as well as a lack of access to affordable childcare. The June 2021 Whatcom County Child Care Demand Study (by CEBR at WWU, commissioned by United Way of Whatcom County) projects a gap in available childcare for children aged 0-5 of 5,817 slots.

Across the community the past few years, the families with children population has seen the most significant increase proportionally in regards to populations experiencing homelessness. While in this section we are focusing on those families with children who are vulnerable to entering into homelessness (and not yet experiencing it), the drastic increase in the amount of families *experiencing* homelessness further underscores the precariousness of the situation for this particular qualifying population. According to Whatcom County's 2018 Point in Time Count, 68 families with children were counted as experiencing homelessness. In the 2021 PIT Count, 96 families with children were experiencing homelessness.

Seniors/Veterans

An additional unmet housing need is shelter or other housing options specifically catering to seniors and veterans experiencing homelessness. There are a number of tenant-based resources for veterans seeking affordable housing (including VASH vouchers, etc.) but there are no shelter beds, interim housing facilities, or permanent housing specifically addressing the housing needs of veterans, though veterans are served through the available beds and units for adults in general.

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

A significant gap in the current shelter bed and shelter unit inventory in our community is a shelter(s) that caters to the emergency shelter needs of families with children. As illustrated above, right now there are no permanent programs that offer an emergency shelter option for families with children experiencing homelessness. This need is currently met with emergency motel room placements.

An additional need within the current shelter and housing inventory is more robust homeless prevention resources. Currently only a few resources are available to households at risk of homelessness through light-touch preventative interventions. Homeless service providers have anecdotally reported that a lack of homeless prevention services in the community has compounded the current crisis of individuals experiencing homelessness, and that an increase in this type of service intervention would ultimately yield a decrease in the number of households who enter into homelessness.

All access to services for individuals who qualify as homeless are made through our CoC's Coordinated Entry System, which provides regular reporting to the City.

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 HOME-ARP notice defines “other populations” as populations who do not meet the criteria as established in the previous populations (homeless individuals, individuals at-risk of homelessness, individuals fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking) as such:

- 1) Other Families Requiring Services or Housing Assistance to Prevent Homelessness is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.
- 2) At Greatest Risk of Housing Instability is defined as household who meets either paragraph
 - (A) or (ii) below:
 - i. has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);
 - ii. has annual income that is less than or equal to 50% of the area median income, as
 - iii. determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:
 1. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 2. Is living in the home of another because of economic hardship;
 3. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 4. Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low- income individuals;
 5. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger

housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

6. Is exiting a publicly funded institution, or system of care (such as a health- care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
7. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan

Identify priority needs for qualifying populations:

A chief need for households both at-risk of homelessness and households who have newly entered into homelessness is bolstered homeless prevention services in the community. As mentioned above, there is a real lack of homeless prevention services in the community. Households at-risk of entering into homelessness need an opportunity to access light-touch supportive services (including housing relocation and stabilization services (including security deposits, rental application fees, utility deposits and payments, moving costs, housing search and placements, short-term (up to 3 months) and medium-term rental assistance (more than 3 months less than 24), housing stability case management, mediation, and legal services, and credit repair) that will allow these households to bypass entry into homelessness. Increasing homeless prevention services in the community have an added benefit of serving all four Qualifying Populations as outlined above.

Additionally, another significant need for individuals experiencing homelessness is continued access to supportive services and case management which will ensure individual success with the transition out of interim housing and into permanent housing.

By bolstering supportive services and case management in the PJ, the effect is twofold; first, this will help solve the logjam of households who are stuck in shelters and interim housing and help facilitate placements of these households into permanent housing. Secondly, this support will help households find stability in permanent housing, and decrease the likelihood of these households returning to homelessness.

These services are often coupled with Tenant Based Rental Assistance to reduce any cost burden and make housing more accessible to households in need. As demonstrated elsewhere in this report, there is a lack of affordable housing available, and rent supports are necessary when a unit is found to be a housing solution for an otherwise homeless or at-risk-of-homeless household.

In addition to the services associated that are articulated herein, the actual place to sleep is also a priority need, which includes a shelter, interim housing facility, or permanent housing unit.

In summary, the priority needs are:

- Homeless prevention services and housing case management services
- Noncongregate shelter

- Tenant Based Rental Assistance (TBRA)
- Interim and/or permanent housing

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:

In order to outline the level of need and gaps in the City's shelter, a full inventory of the community's shelter beds was taken. From there, an analysis was conducted to identify any specialty populations who were left unserved/underserved by the current shelter inventory.

The level of need and gaps in the housing inventory was determined by examining the current housing stock in the community and conducting an analysis of the housing offered. Metrics looked at included affordability, vacancy rate, and size/bedroom count. This was then examined across the number of households at different income brackets and at different sizes to identify the need in the community for affordable housing.

In order to ascertain the needs and gaps in the service delivery system, community service providers were consulted and asked where they believed that resources were lacking on the services side. This work was conducted on a parallel track to looking at the City's services budget, and examining which channels of services were robustly funded and which channels were underfunded.

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:

Applications for funding for HOME-ARP projects will follow the standard City of Bellingham allocation process. This process entails the solicitation of applications for funding through a Notice of Funding Availability. The applications must include information on the specific project or program details, including notes on the project or program size, populations that will be served by the project or program, and an outline of funding needed to support the development and/or ongoing service or operational needs of the project.

Upon receipt of the application, the City will consider all applications and seek public feedback via the standing Community Development Advisory Board meetings, held monthly. Projects who qualify under application guidelines will be considered for HOME-ARP funding. The Notice of Funding Availability will not outline a preference of one QP over another, but, as noted below, the City may implement a preference in the review process to "other populations" with the most significant gaps in services, shelter or housing (including families with children) through a points system published in the Notice of Funding Availability.

To the degree that agencies are serving homeless households, we expect them to be participating in the CoC's Coordinated Entry System. This will be a requirement of agencies seeking funding for services or housing directed to homeless households, but it should be noted that Coordinated Entry is not anticipated to be the sole referral process. We recognize that there are nuances to laying programs and preferences on top of the Coordinated Entry process, and that there can be

conflicts between Coordinated Entry's prioritization of high-vulnerability households and universal access to programming across all qualifying populations, especially in the instance of some of the lighter-touch prevention services needed in the PJ. We expect there to be dialogue with the referral agencies involved and coordinated entry referral partners to ensure the program parameters and preferences were the base layer on top of which any additional referrals through coordinated entry or elsewhere were made.

Describe whether the PJ will administer eligible activities directly:

The PJ will not administer eligible activities directly. Direct services development activities associated with housing and homeless services and/or noncongregate shelter or housing development will be assumed by subrecipients awarded HOME-ARP funding by the PJ.

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:

No portion of the PJ's HOME-ARP administrative funds were awarded to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

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	\$ 2,000,000		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ #		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 184,701	8 %	15%
Total HOME ARP Allocation	\$ 2,184,701		

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

The PJ has other funding available to address the priority needs of the qualifying populations, and in addition to the information outlined in this plan, will consider constraints and requirements associated with funding sources to target the specific source with the appropriate

use. The City will take efficiency, administrative burden, and other similar factors into consideration when determining where to use the HOME-ARP funding when other funding sources are also available to address the needs.

To that end, while the uses are proposed herein, the following are proposed as contingency uses: Tenant Based Rental Assistance (TBRA), Development of Affordable Rental Housing, and Development of Noncongregate Shelter Facilities.

These contingencies will be considered if the HUD HOME-ARP funding is adjusted, if planned activities do not go forward, if agencies are not able to respond to or implement the activities, or if funding amounts or sources for listed projects are modified, all in accordance with the Community Participation Plan. These changes based on contingencies are not considered substantial amendments.

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:

All of the forgoing information clearly targets the activities suggested in the funding plan, especially to the degree these activities prioritize populations with the largest gap in housing and services, such as households with children present, seniors, or veterans.

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:

If HOME-ARP funds are utilized to support the development of affordable rental housing units, up to 7 affordable rental units for qualifying populations may be produced.

This outcome was determined by utilizing the HOME-ARP Housing Production Goal Calculation Worksheet, as provided by HUD.

This number of affordable units were calculated by taking the HOME-ARP allocation for the PJ (nearly \$2mm in funds) and subtracting any anticipated administrative costs and about \$400,000 set aside from the HOME-ARP Allocation to support the ongoing operational costs and the operating cost reserve of any project constructed.

The remaining amount was then divided by the maximum subsidy per unit (\$213,717 for a 2 bedroom unit, which is what would need to be built to support the housing needs of a family comprised of an average of 3 people). Using this math, it was determined that an estimated 7 units could be constructed using this amount of funding.

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:

No specific goal has been outlined to compel the production of affordable rental housing. Rental housing production is listed as a contingency project.

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:

All four qualifying populations (Homeless, At-Risk of Homelessness, Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, and “Other” Populations as defined by the City) will be eligible for HOME-ARP assistance under the plan proposed herein.

Though all four qualifying populations will be eligible for HOME-ARP assistance under the plan proposed, preference will be given to the fourth qualifying population (“Other” Populations as defined by the City).

For the purposes of this allocation plan, this PJ will consider “other populations” households (as defined in Section 7 above) at greatest risk of housing instability (meaning households in the community making less than or equal to 50% AMI and still rent burdened). Additionally, for the purposes of this allocation plan, the City may give preference to “other populations” with the most significant gaps in services, shelter or housing, such as households with children present, seniors, or veterans. There is currently a significant lack of services and supports offered to these populations, see Section 2 above for more details. Among this population, the City shall particularly focus on supporting the needs of households experiencing the greatest gaps between needs and services/supports offered, and populations currently most at-risk of experiencing housing instability and homelessness, as further outlined in the gaps and needs analysis above.

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:

The reason for a preference consideration, if a preference consideration is made, will be due to the clear gap present for these populations.

The City will continue supporting the existing services in the community for all qualifying populations with other funding sources, and will target the HOME-ARP funds to the areas where there is a gap, the funds are appropriate to utilize, and there is an agency who is interested in addressing the need and implementing the program(s) or project(s) in the community.

Referral Methods

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

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant

directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

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

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

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

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

To the degree that agencies are serving homeless households, we expect them to be participating in the CoC's Coordinated Entry System. This will be determined through the NOFA/RFP process and responses from agencies seeking funding for services or housing.

It should be noted that Coordinated Entry is not anticipated to be the sole referral process. We recognize that there are nuances to laying programs and preferences on top of the Coordinated Entry process, and that there can be conflicts between Coordinated Entry's prioritization of high-vulnerability households and universal access to programming across all qualifying populations, especially in the instance of some of the lighter-touch prevention services needed in the PJ. We expect there to be dialogue with the referral agencies involved and coordinated entry referral partners to ensure the program parameters and preferences were the base layer on top of which any additional referrals through coordinated entry or elsewhere were made.

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 PJ intends to use the coordinated entry process in the event that agencies plan to serve homeless households. To the degree that qualifying populations will be determined eligible for HOME-ARP activities, this will be further analyzed through the standard City of Bellingham allocation process. This process entails the solicitation of applications for funding through a Notice of Funding Availability.

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):

At this time, no method of prioritization has been determined. This will not be determined until the PJ undergoes its standard allocation process for activities funded utilizing HOME-ARP funding. To the degree that agencies are serving homeless households, we expect them to be participating in the CoC's Coordinated Entry System.

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):

At this time, it is unclear what referral process will be utilized for the HOME-ARP funded activities. This process will be dependent upon the type of activities funded. To the degree that agencies are serving homeless households, we expect them to be participating in the CoC's Coordinated Entry System.

Limitations in a HOME-ARP rental housing or NCS project

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.

- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

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

The PJ does not plan to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population.

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:

This is not applicable to this PJ's HOME-ARP Allocation Plan.

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):

This is not applicable to this PJ's HOME-ARP Allocation Plan.