

## HOME-ARP Allocation Plan Template with Guidance

**Instructions:** All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

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

### **Template:**

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

The City of Greeley became active and engaged with the community around the growing population of persons experiencing homelessness and possible solutions during the first quarter of 2022. The reason for this significant shift by the City of Greeley, is because there is new leadership at the City including the City Manager, Deputy City Manager, and Assistant City Manager. The Assistant City Manager’s priorities are homelessness, housing, and neighborhood engagement. The Assistant City Manager was selected for specific expertise in the areas of Homelessness and Housing. She has over 15 years of both direct service and leadership. She worked for and continues to consult with Dr. Sam Tsemberis who is the creator of the evidenced based practice of Housing First.

Prior to the Assistant City Manager’s arrival, the city engaged Urbanity Advisors to provide the City of Greeley with research on best practices and models for people experiencing homelessness and to develop more affordable housing. Urbanity Advisors was also tasked with conducting multiple focus groups with a wide range of community partners. The partners and the dates of these community listening sessions are listed below. There were several questions posed during these meetings, including what the attendees’ preferences were in regard to the City of Greeley’s resources such as HOME, CDBG, and the General Fund of the City of Greeley’s budget. All the focus groups and listening sessions included people with lived experiences of homelessness and housing insecurity. Urbanity Advisors led three neighborhood meetings, conducted three surveys, and requested comments on Speak Up Greeley, (a social media engagement tool in which all posts from the City of Greeley are in English and Spanish). Neighborhood meetings were offered in person at the Greeley Recreation Center (in the heart of a low- moderate-income neighborhood) and via Zoom; surveys were done online. See table below for numbers of participants.

As noted, Urbanity Advisors was engaged to provide the City of Greeley with research information related to best practices on homelessness and affordable housing and conducted multiple focus groups with a wide range of community partners.

Urbanity Advisors led three neighborhood meetings, conducted three surveys, requested comments on Speak Up Greeley, (a social media engagement tool, all posts from the City of Greeley are always in English and Spanish). Neighborhood meetings were offered in person at the Greeley Recreation Center (in the heart of a low- moderate-income neighborhood)) and via Zoom; surveys were done online. See table below for numbers of participants, the different organizations, and dates of consultation.

**List the organizations consulted:**

**Urbanity Advisors Community Outreach Summary**

Date & Time	Location	Public Participants
Session One		
February 16, 2022	Zoom	68
February 17, 2022	Greeley Recreation Center	39
Survey 1	Online	72
Session Two		
April 13, 2022	Zoom	43
April 14, 2022	Greeley Recreation Center	36
Survey 2	Online	32
Session Three		
May 18, 2022	Greeley Recreation Center	22
May 19, 2022	Zoom	16
Survey 3	Online	97
Date & Time	Location	Participants
Session Three		
May 18, 2022	Greeley Recreation Center	22
May 19, 2022	Zoom	16
Survey 3	Online	97

<b>Agency/Organization</b>	<b>Org Type</b>	<b>Method of Consultation</b>
<b>Northern Colorado Continuum of Care</b>	<b>Continuum of Care</b>	In-person meetings
<b>City of Evans, Economic Development</b>	Local Government	In-person meetings
<b>Mosaic Church</b>	Faith-based	In-person meetings
<b>City of Greeley, Chief Resiliency Officer</b>	Local Government	In-person meetings
<b>Poudre Trail</b>	Local Government	In-person meetings
<b>City of Greeley, Community Development</b>	Local Government	In-person meetings
<b>City of Greeley, Economic Health &amp; Housing</b>	Local Government	In-person meetings
<b>Catholic Charities</b>	Non-profit agency- <b>Transitional Housing Provider/ Homeless Service Provider – Qualifying Population</b>	In-person meetings
<b>Otis &amp; Bedingfield</b>	Legal- works with people and families who are vulnerable/dealing with disabilities and needing assistance in the are of housing and real estate/ <b>Fair Housing</b>	In-person meetings
<b>City of Greeley, Greeley Urban Renewal Authority</b>	Local Government	In-person meetings
<b>Weld County Department of Human Services</b>	County Government/ homeless/ At risk of Homelessness/ Domestic Violence – three <b>Qualifying Populations</b>	In-person meetings
<b>Colorado Department of Corrections</b>	County Government	In-person meetings
<b>United Way of Weld County</b>	Non-profit agency-multiple focuses/ <b>homeless services- Qualifying Population</b>	In-person meetings
<b>Weld Trust</b>	Non-profit agency (funder)	In-person meetings
<b>Greeley Fire Department</b>	Local Government	In-person meetings
<b>City of Evans, City Manager</b>	Local Government	In-person meetings
<b>High Plains Housing Development Corporation</b>	Non-profit housing developer	In-person meetings

<b>North Range Behavioral Health</b>	Non-profit agency-mental health	In-person meetings
<b>High Plains Library District</b>	Library	In-person meetings
<b>Sunrise Community Health</b>	Non-profit agency-health provider	In-person meetings
<b>North Colorado Health Alliance</b>	Non-profit agency-health provider	In-person meetings
<b>City of Greeley, City Manager</b>	Local government	In-person meetings
<b>Greeley/Weld County Housing Authorities</b>	Housing authority/ address <b>fair housing concerns/ priorities people with disabilities – Qualifying Population</b>	In-person meetings
<b>Dayspring Christian Academy</b>	Education	In-person meetings
<b>North Colorado Medical Foundation</b>	Non-profit agency-funder	In-person meetings
<b>Greeley Family House</b>	Non-profit agency-shelter and services-families	In-person meetings
<b>Jobs of Hope</b>	Non-profit agency-reentry housing and services- for men that are homeless and recently released from jail or prison	Discussions through Northern Colorado Continuum of Care
<b>Volunteers of America</b>	Non-profit agency- <b>Veterans</b> services – <b>Qualifying Population</b>	Discussions through Northern Colorado Continuum of Care
<b>Greeley-Weld Habitat for Humanity</b>	Non-profit agency-developer of housing for LMI households/ They have also worked with several families that they prioritized because they were fleeing <b>Domestic Violence. They also support many people who are at risk of homelessness. – Qualifying Populations</b>	In-person meetings
<b>Additional Consultations since the arrival of the Assistant City Manager- Juliana Kitten MSW - Sept 2022-Jan 15<sup>th</sup> 2023</b>		
<b>Sargent Matt Patella of Greeley's Police Dept Neighborhood Action Team</b>	Leads the team that has the most interaction with people experiencing homelessness. He was also consulted for his knowledge of sex trafficking activities in Greeley and the surrounding Area – provide information and comment on two <b>Qualifying Populations</b> – People <b>experiencing homelessness</b> and people who are fleeing/ <b>sex trafficking</b> / As well as how sex	In person with City Leadership

	trafficking rings have practiced based on who they target and where it happens most frequently.	
<b>The Avery Center</b>	Not for profit – focused on ending <b>Sex Trafficking</b> . – Serves a <b>Qualifying Population</b>	Assistant City Manager reached out to the Executive Director of the Avery Center via LinkedIn, Megan Lundstrom. Megan Lundstrom responded that she recently left the Avery Center to work with TAC – a national consulting firm. She provided the Interim Executive Directors email. I am still working to set up a meeting with Daniel Eastman. The Interim CEO
<b>City Attorney's office</b>	Local Government	Assistant City Manager had two meetings with two different City Attorney's and discussed several topics related to housing and homelessness, civil rights related to places people can be, right of people with disabilities specifically related to housing as well as some potential initiatives such as a diversion court for people experiencing homelessness
<b>People currently experiencing homelessness</b>	<b>Literally Homeless - QP</b>	Assistant City Manager met with people experiencing homelessness, this was done at the Housing Navigation Center as well during three separate outreach visits to encampments to specifically ask the people at those homeless encampments what they thought the greatest need in our community was. The overwhelming majority said their own housing and that there was also a need for more substance use services
<b>A woman's place</b>	Greeley's only shelter specifically for people experiencing <b>Domestic Violence- (Qualifying Population)</b>	They are an active member in the Continuum of Care. Also, Ms. Kitten met with their Executive Director to learn more about their services and specific gaps they see for their population. There were two major areas identified <ol style="list-style-type: none"> <li>1. There are not enough shelter options for people experiencing domestic violence</li> <li>2. Need for more rental subsidies and affordable housing units</li> </ol>
<b>The Veterans Resource Center</b>	<b>Qualifying Population- Veterans</b>	The Veterans Resource Center feedback via email. The following is what they noted as current needs for the Veteran population:

		<p>Everything associated with housing is a need: finding suitable housing; <b>assistance with rent and/or mortgage; utility assistance; help with deposits, application fees, 1<sup>st</sup> month's rent.</b></p> <p>He said pretty much everyone they talk to has some kind of a need associated with <b>housing/shelter.</b></p> <ul style="list-style-type: none"> <li>• Many of the Veterans he sees absolutely will not go to the Cold Weather Shelter. They suffer from PTSD and mental issues and “cannot” sleep that closely to someone.</li> <li>• <b>VASH vouchers – waiting list. He’s had one Veteran waiting for 6+ months.</b></li> <li>• A number don’t qualify for VASH vouchers, as they did not receive an honorable discharge.</li> <li>• Services – they don’t qualify for services if they weren’t honorably discharged (mental health, addiction, etc. from VA). <b>Cost is definitely prohibitive.</b></li> <li>• <b>Transportation is hard.</b> The closest VA is in Loveland and the bus only runs there a couple of times a day, one of which runs real early (he thought) and then they have a walk to get from the bus stop to the VA office.</li> <li>• <b>Of the people he saw last year, about 40% were homeless. The others were fearful of losing the housing they had (no money for rent/mortgage/utilities).</b></li> </ul> <p>A good deal of the Veterans won’t access Guadalupe due to having to be sober</p>
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***Summarize feedback received and results of upfront consultation with these entities:***

The initial round of consultations conducted by Urbanity Advisors included the following summary and suggestions:

1. There is a lack of coordination and leadership among the current not for profits, Weld County Department of Human Services, and the City of Greeley

2. The City of Greeley needs to in the short-term to coordinate and provide leadership to the various stakeholders, to ensure everyone has the same understanding of current resources, and the largest gaps in the community's existing homeless services infrastructure. This task force lead by the city will focus the current efforts and resources to maximize all possible resources for the most vulnerable
3. Conduct a Housing Needs Assessment
4. Prior to deciding on a campus model for people experiencing homelessness, the community needs to have much more in-depth research about this model, the successes, and potential failure points
5. Establish a user-friendly resource guide for organizations, housed and unhoused citizens
6. The only emergency shelter only operates during the winter. This is a huge gap and there is a need to look at creative temporary solutions

At the beginning of 2023, another survey was sent to all the agencies and organizations listed above and was also publicized on the Speak Up Greeley engagement page. The Survey was in both English and Spanish. It was very simple. It described the qualifying populations as well eligible activities, and they were asked to rate each activity from 1-4 with 4 being the most important. We received between all platforms over 125 responses. The community members and providers selected two areas that they felt were the most important:

1. A 365 year-round emergency night and day shelter
2. More affordable housing

## Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for "reasonable notice and an opportunity to comment" for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

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

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

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

**Template:**

***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:*** 1/29/2023 (for public comment and 1<sup>st</sup> public hearing), 2/19/23 (for 2<sup>nd</sup> public hearing)
- ***Public comment period:*** start date – 2/09/2023 end date - 2/25/2023
- ***Date(s) of public hearing:*** Two public hearings held – 2/8/2023 and 3/7/2023

***Describe the public participation process:***

Posted notice of the 15-day comment period, public meeting, and public hearing were in the local newspaper, the Greeley Tribune, in both English and Spanish. The same were provided through email newsletters, on the Greeley Urban Renewal Authority and Housing and Homeless Services websites, and via social media outlets. A digital copy of the allocation plan was available for review and comment on the same websites and was provided to the agencies of the City's CDBG partner group; physical copies were posted at the four local libraries.



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***Describe efforts to broaden public participation:***

1. Hired a consultant to conduct public meetings, surveys, etc. The meetings were held both virtually and at a location in a low- moderate, downtown location. Surveys were available online.
2. Provided information and the ability to comment on the website Speak Up Greeley.
3. Provided the allocation plan in a variety of ways, including digitally and in hard copy.
4. Utilized the four local libraries as a means to provide the Allocation Plan to the public.
5. Utilized social media to the extent practicable.
6. Held an extra public hearing (additional to the one required).
7. Shared the Allocation with the City's CDBG partner group through email notifications.
8. Shared the Allocation Plan with the attendees at the Urbanity Advisers meetings.

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

Pending

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

Pending



## 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.

### **Template:**

This allocation plan is specific to the City of Greeley, however much of the data available is for all of Weld County (the Greeley Metropolitan Statistical Area), and in some cases, both Weld and Larimer Counties (which is the region for the Northern Colorado Continuum of Care).

Because people experiencing homelessness can be quite transient, information for any of the “boundaries” noted are applicable to the issues. City leadership believes the current numbers to be higher than those shown for Greeley in the table below. Fort Collins is the largest of the cities noted, followed by Greeley, then Loveland.

### **Sheltered and Unsheltered Homelessness – 2022 Point-in-Time Count**

Location	Sheltered		Unsheltered		Total
Greeley	153	65%	83	35%	236
Loveland	70	37.5%	116	62.5%	186
Fort Collins	284	77%	84	23%	368
Other	2	100%	0	0%	2

### **Current Housing Inventory – 2022 Point-in-Time Count**

All noted agencies below are in Greeley.

Agency	Type	Special Populations	Year-Round Beds	Seasonal Beds	Over-flow	Total Beds	PIT Count	Utilization Rate
A Woman’s Place	Emergency Shelter	DV	11			11	6	55%
Catholic Charities	Transitional Housing		43			43	27	63%
Greeley Family House	Transitional Housing	Families	22			22	22	100%
United Way of Weld County	Cold weather emergency shelter	Low Barrier – accepts anyone who asks for shelter,	0	62		62	55	89%

		will provide motel rooms for families with children						
Catholic Charities	PSH	Families	71			71	71	100%
North Range Behavioral Health	PSH 1	Supports people with a range of mental health. Trauma and issues related to substance misuse	6			6	6	100%
North Range Behavioral Health	PSH 2	Supports people with a range of mental health. Trauma and issues related to substance misuse	1			1	1	100%
North Range Behavioral Health	PSH 3	Supports people with a range of mental health. Trauma and issues related to substance misuse	19			19	13	68%
Greeley Family House	Transitional Housing	Families	25			25	25	100%
Jobs of Hope, Inc.	Transitional Housing	Exiting correctional system	12			12	6	50%
North Range Behavioral Health	Transitional Housing	Supports people with a range of mental health.	12			12	8	67%

		Trauma and issues related to substance misuse						
<b>Current Gap</b>	<p>Based on the 2022 Point in Time Count and the available beds and types of beds/housing. It is clear that there is not enough of any resource emergency shelter, permanent supportive housing, domestic violence shelter beds etc.</p> <p>The only emergency shelter operates from November to April. The rest of the year we have ZERO emergency shelter beds. Based on the most recent Point in Time count – which is typically an under-count - <i>Greeley has 236 people experiencing homelessness. Of those 236 people only 62 people will be able to access emergency shelter and only during the months of Nov-April. At this point, since emergency shelter is for basic survival- this appears to be the most acute gap.</i></p>							

The Weld County Health Department just completed their latest Community Health Survey the following are excerpts from their initial analysis related to Housing.

Sixteen percent of Greeley residents reported having an unstable housing situation, higher than the countywide rate of 9.5%.	<p>1 in 5 Greeley residents (20%) said that more than one family lived in their home at the time the survey was administered. This could be for temporary or permanent reasons. Countywide, the rate of double-up households was 15%.</p> <p>In 2019, 9.5% of Greeley residents said more than one family lived in their home.</p>
In 2019, 13.5% of Greeley residents reported unstable housing.	<p>More than a third (36%) of Greeley residents reported being housing cost burdened (spending more than 30% on rent/mortgage and utilities). Countywide, 33% reported being housing cost burdened.</p>

The American Community Survey from the U. S. Census Bureau shows a Greeley population estimate of 109,323 on July 1, 2022.

State of Colorado Statewide Apartment Survey for 1<sup>st</sup> Quarter 2022 for Greeley Metro Area.

Vacancy rate	4.1%
Average rent	\$1,356
Median rent	\$1,350
Inventory (number of properties surveyed)	5,314
Number of properties surveyed	36

Vacant	220
Average rent – studio	\$974
Average rent – 1 BR	\$1,237
Average rent – 2 BR, 1 BA	\$1,195
Average rent – 2 BR, 2 BA	\$1,558
Average rent – 3 BR, 2 BA	\$1,787
Average rent – “Other”	\$1,222
5+ unit properties per Census (2020 5-Year American Community Survey)	8,833
LIHTC units per CHFA	1,567
Estimated market rate units	7,266
2+ unit properties per Census (2020 5-Year American Community Survey)	13,104

The following table is from Greeley’s Strategic Housing Plan:

Housing mix	63.56% SF; 36.44% MF
Greeley’s MF units not constructed – “short”	401

The following information is from U.S. Census (2021 ACS 1-year estimates):

Occupied renter-occupied units	14,604
# With household income <\$25,000	5,041

Assistant City Manager Juliana Kitten recently met and consulted with the **Weld County Apartment Association**. They reported a higher vacancy rate than what is listed above. Many of the representatives discussed their desire to work with people who have a voucher or other rental subsidy and/or people experiencing homelessness, but their concern was that historically a case manager will move someone in and then they rarely see that case-manager again, and when they try to reach out, the response of the social service agency is limited and they end up with many people facing eviction because they need more help than what the landlord or property manager can provide. The major theme was they would like to help and partner, but they need the social service agencies to provide more support to their tenant and be more responsive to landlords and property managers.

Based on the above information- the information received during consultation and recent surveys by the Weld County Health Department, over one third of our residents report spending more than 30% of their income on rent, and they are worried about this housing burden. More than 20% of our residents are living doubled up. The need in Greeley like the rest of the country for affordable housing is building and without dramatic action it has and will continue to grow.

***Describe the size and demographic composition of qualifying populations within the PJ’s boundaries:***

***Homeless as defined in 24 CFR 91.5***

**1. Homeless**

From 2022 PIT Report for Weld County (Total – 236) and U. S. Census Data

Program Type	Number of People	Percent of People
Emergency shelter	114	48.31%
Transitional Housing	39	16.53%
Unsheltered	83	35.17%
Gender	Number of People	Percent of People
Male	145	61.44%
Female	90	38.14%
Gender non-conforming	0	0%
Transgender	1	.42%

The City of Greeley has a total number of 236 people experiencing homelessness. Of that number we know that 62 meet the definition for chronic homelessness. Based on the point in time count. We know that in the City of Greeley during the 2022 point in time count, 82 people were unsheltered. Our emergency shelter was 89% full, so if any of the 83 people wanted emergency shelter only 10 would have a bed available to them.

***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***

There are many populations that need services and are great risk. Currently there are no shelters other than the domestic violence shelter that can accommodate someone who is in wheelchair. There is a supportive housing not-for profit apartment complex specifically for people who have suffered brain injuries, that has cut many of its services the last two years, and now they are asking people to find other places to live as they plan a remodel, starting in July 2023. There are very few apartments that will be designed for their needs. We have many different immigrant populations in Greeley. Many of them come to work at the local meat processing plants and in the agriculture industry. More outreach to these communities is needed. Our local university- University of Northern Colorado is starting this year, for the first time, a social services hub to assist their students who are homeless and the ones that are ‘couch-surfing’ and at great risk for homelessness.

***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):***

As noted above, we have a congregate emergency shelter that operates six months a year and is inadequate for the number of people experiencing homelessness on a year-round basis. There are zero non-congregate emergency shelter options.

No agency is running a tenant-based rental assistance program with the exception of Weld County, which started one during the pandemic.

North Range Community Mental Health runs some permanent supportive housing units, but they also have made it very clear that this a bit of mission drift for them, and they want to get out of the property management business.

Currently the Greeley/Weld Housing Authority had not prioritized the needs of people who are homeless. Their top priorities are seniors and people who are at risk of homelessness. They also currently have over \$250,000 that could be used for rental subsidy but is not.

***Describe the unmet housing and service needs of qualifying populations:***

As noted above the City of Greeley has just hired Development Strategies to perform a Housing Market Analysis. One of the main objectives of this study is to provide a road map about the number and type of housing units that are needed and for each income level. An area that certainly needs attention is more programs to prevent homelessness. Weld County is providing emergency rental assistance, but often people are at the place of days or weeks at most away from eviction, which is very traumatizing and disruptive, if there was more in reach and coordination between the various departments at Weld County DHS and the City of Greeley's Service providers. This is true for people who are coping with Domestic Violence, Homelessness, and being at Risk of Homelessness. In addition, our Veterans, and their services, are a bit more isolated from other services. Also, the closest VA hospital and housing program, is an hour away in Cheyenne, Wyoming. There is a local agency that operates an SSVF program, and they are doing everything they can, but they are under-resourced and because of this have a difficult time helping their clients, to quickly find housing.

Another area of service that affects all of the qualifying populations is our transit system. There is no service on Sunday's, the buses stop running at 8:00pm and the only emergency shelter is located on the very eastern boarder of the city limits, so often transportation, is needed for someone to access it.

***Homeless as defined in 24 CFR 91.5***

The City of Greeley has a total number of 236 people experiencing homelessness. Of that number, we know that 62 meet the definition for chronic homelessness. Based on the point in time count. We know that in the City of Greeley during the 2022 point in time count. 82 people were unsheltered. Our emergency shelter was 89% full, so if any of the 83 people wanted emergency shelter only 10 would have a bed available to them.

There are very few resources for intensive on-going case-management once a person has been housed.

There is only one person in the community who provides outreach services and that is only one day a week.

The care for people experiencing homelessness is falling to our police and fire departments.

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

Currently there is not a strong data set that identifies this. Since the pandemic, the county has run the Emergency Rental Assistance Program and is adding another several millions of dollars to that this year. We have a goal of stronger coordination with all our partners. But as previously noted, there are many hundreds of residents in Greeley that are rent-burdened, doubled-up and are essentially one paycheck or medical illness away from becoming homeless.

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

According to the consultation with our domestic violence providers, there is a very large hidden need beyond what the point in time count demonstrated for people who are experiencing domestic violence. Their most recent statistics show the following for just their shelter.

In 2022:

- 844 crisis calls
- 385 victims served
- 459 clients received job-searching support for long-term self-sufficiency
- 907 legal advocacy services provided

During my consultation with Sargent Patella, Greeley Police Department, about people who are fleeing Sex Trafficking situations, he noted that most of the victims were young women, who were homeless when they were targeted. He discussed how many of the lower cost hotels are where the majority of these issues take place in Greeley and that there is an area they are targeting. He also noted that they do not have enough focus and dedicated officers addressing this issue. He certainly believes it is a larger issue that needs more discussion and attention.

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

See above under current resources for explanation of gaps.

***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:***

N/A

***Identify priority needs for qualifying populations:***

Basic emergency day and night shelter that operates 365 days a year

***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 plan is based on the 2022 point in time count, the major themes from all surveys and interviews, and then selecting the need that seems most acute at this time. The most acute needs is that lack of a 24/hr, 365 days a year emergency day and night shelter. Also, the emergency shelter beds during winter are inadequate. There is clear support for this across all sectors of our community. Finally, Greeley has such limited services at every level for people experiencing homelessness, we could have picked any activity, but we choose this based on the data and the community’s voice, as well as the fact that an emergency shelter can save people’s lives and without doing this, people experiencing homelessness lives are at greater risk without this.



## HOME-ARP Activities

### **Template:**

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

There will be a scoring template created based on best practices in development of non-congregate shelters. The rating committee will be made up of subject-matter experts, people with lived experience of homelessness and members of the qualifying populations.

*Describe whether the PJ will administer eligible activities directly:*

At this point, the plan is not to provide any of the services or development directly.

*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:*

N/A

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.

### **Template:**

#### **Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ #		
Acquisition and Development of Non-Congregate Shelters	\$ 1,259,235		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ #		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 222,218	# %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,481,453</b>		



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

This investment will be a portion of the fund required for the non-congregate year-round 24-hour day and night emergency shelter. The goal will be to work with DOLA's division of Supportive Housing, utilizing their recently released transformational grants as another funding source. We will also be working with both local private public supporters to complete the financing for the shelter and the necessary supportive services it will require.

***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 fact that there are grossly inadequate emergency shelter beds during winter and zero available during the rest of the year, is the driving data informing this plan. Also, there is support for this across all sectors of our community. Finally, Greeley has such limited services at every level for people experiencing homelessness, we could have picked any activity, but we choose this based on the data and the community's voice, as well as the fact that an emergency shelter can save people's lives and absent doing this, the lives of people experiencing homelessness will be at greater risk.

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

### **Template**

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

0

***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:***

0

## **Preferences**

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

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

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

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

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

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ’s HOME-ARP allocation plan.** Adding a preference or

limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

**Template:**

***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:***

No preference

***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:***

No Preference

**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).

**Template:**

***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):***

We will ensure that the eventual non-congregate 365 days a year emergency night and day shelter that is built -will accept all referrals in addition to most of the referrals which are expected to be self-referrals, of people walking in.

***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):***

N/A

***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):***

N/A

***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):***

N/A

**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.

### **Template**

***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:***

No limitation

***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:***

No limitation

***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):***

No limitation

## **HOME-ARP Refinancing Guidelines**

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

The City 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, and thus has responded "N/A" to all requirements below.

- ***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***

N/A

- *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.*

N/A

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

N/A

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

NA

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

NA

- *Other requirements in the PJ's guidelines, if applicable:*

N/A