

City of Chicago
HOME-ARP Allocation Plan

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).

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Template:

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

The City of Chicago conducted its consultation processes through three main methods: the Chicago CoC Relief Funding Working Group, a series of community feedback meetings, and through the distribution of surveys.

Following the passage of the American Rescue Plan, the Chicago Continuum of Care (CoC) convened the Chicago CoC Relief Funding Working Group and submitted recommendations to the City of Chicago on funding needs to put Chicago closer to our goal of preventing and ending homelessness. Recommendations were for all ARP funding coming to the City and State,

including both HOME-ARP funding and Coronavirus State and Local Fiscal Recovery Funds. The Relief Funding Working Group was composed of key stakeholders throughout the CoC, with representation distribution that mirrors the CoC Board of Directors.

Recommendations from the CoC Relief Funding Working Group served as the basis for the City's proposal for HOME-ARP funding shared back with the community for additional input in spring 2022.

The City of Chicago hosted a series of online public meetings regarding funding under the HOME Investment Partnership Program from the United States Department of Housing and Urban Development (HUD). Specifically, the Department of Family and Support Services (DFSS) and the Department of Housing (DOH) hosted three opportunities for the community to provide input on the proposed allocation plan.

The schedule of sessions is below:

- Tuesday May 31st 1:00 to 2:30 Community Feedback Meeting
 - Intended for any homeless services and housing stakeholders to learn about the HOME-ARP grant and a proposed allocation plan from DFSS and DOH and provide comment.
- Monday, June 6th 11:00 am to 12:30 pm Community Feedback Meeting Dedicated for People with Lived Experience
 - Intended for people with lived experience of homelessness, gender-based violence, or housing instability to learn about the HOME-ARP grant and a proposed allocation plan from DFSS and DOH and provide comment.
- Thursday, June 16th 12:30 pm to 2:00 pm HOME-ARP Community Feedback meeting
 - Intended for any homeless services and housing stakeholders to learn about the HOME-ARP grant and a proposed allocation plan from DFSS and DOH and provide comment

At each session, DFSS and DOH responded to clarifying questions about the HOME-ARP funding and proposed allocation plan as well as recorded public comments provided verbally or through the chat function.

In addition, DFSS and DOH solicited written feedback through an online survey open from May 31 to June 24. The first session on May 31 was recorded and this recording was distributed to registrants of all webinars, DFSS delegate agencies, and the Chicago Continuum of Care list serv along with the online survey link. DOH community partners and delegate agencies received invitations to the Community Feedback Meetings along with the online survey link.

List the organizations consulted:

The City of Chicago’s consultation process is ongoing and will continue to be updated until the submission of the final allocation plan (which will be available to review online). A list of agency/organizations who have already been consulted with are listed below.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Chicago Continuum of Care	CoC serving the jurisdiction's geographic area	Chicago CoC convened a CoC Relief Funding Work Group that submitted a memo of recommendations	See summary of CoC recommendations below
Chicago Department of Public Health	Public agency that addresses the needs of the qualifying population	CoC Relief Funding Work Group	See summary of CoC recommendations below
Cook County Health	Public agency that addresses the needs of the qualifying population	CoC Relief Funding Work Group	See summary of CoC recommendations below
CSH	Consultant/technical assistance	CoC Relief Funding Work Group	See summary of CoC recommendations below
Deborah’s Place	Homeless service provider	CoC Relief Funding Work Group	See summary of CoC recommendations below
Enterprise	Affordable housing developer/provider	CoC Relief Funding Work Group	See summary of CoC recommendations below
Franciscan Outreach	Homeless service provider	CoC Relief Funding Work Group	See summary of CoC recommendations below
Funders Together to End Homelessness	Funder	CoC Relief Funding Work Group	See summary of CoC recommendations below
Home Base	Homeless service provider	CoC Relief Funding Work Group	See summary of CoC recommendations below

Housing Action Illinois	Advocacy organization	CoC Relief Funding Work Group	See summary of CoC recommendations below
IFF	Consultant/technical assistance	CoC Relief Funding Work Group	See summary of CoC recommendations below
Illinois Department of Human Services	Public agency that addresses the needs of the qualifying population	CoC Relief Funding Work Group	See summary of CoC recommendations below
Illinois Housing Development Authority	Public housing agency	CoC Relief Funding Work Group	See summary of CoC recommendations below
Lightengale Group	Consultant/technical assistance	CoC Relief Funding Work Group	See summary of CoC recommendations below
Polk Bros Foundation	Funder	CoC Relief Funding Work Group	See summary of CoC recommendations below
Supportive Housing Providers Association (SHPA)	Advocacy organization	CoC Relief Funding Work Group	See summary of CoC recommendations below
The Center for Housing and Health	Homeless service provider	CoC Relief Funding Work Group	See summary of CoC recommendations below
UChicago Inclusive Economy Lab	Consultant/technical assistance	CoC Relief Funding Work Group	See summary of CoC recommendations below
Chicago Coalition for the Homeless	Advocacy organization	CoC Relief Funding Work Group;	See summary of feedback survey results below
Heartland Human Care Services	Homeless service provider; Domestic violence service provider	CoC Relief Funding Work Group; Feedback Survey	See summary of feedback survey results below
Matthew House	Homeless service provider	CoC Relief Funding Work Group; Feedback Survey	See summary of feedback survey results below

The Network: Advocating Against Domestic Violence	Domestic violence service provider	CoC Relief Funding Work Group; Feedback Survey	See summary of feedback survey results below
Individuals with lived experience of homelessness, housing instability, or domestic violence	Individuals with lived experience	CoC Relief Funding Work Group; Lived Experience Feedback Session	See summary of lived experience feedback session below
AIDS Foundation Chicago	Homeless service provider	Feedback Survey	See summary of feedback survey results below
All Chicago Making Homelessness History	CoC Lead Agency	Feedback Survey	See summary of feedback survey results below
Arab American Family Services	Domestic violence service provider	Feedback Survey	See summary of feedback survey results below
Breakthrough	Homeless service provider	Feedback Survey	See summary of feedback survey results below
Candor Enterprises	Consultant/technical assistance	Feedback Survey	See summary of feedback survey results below
Casa Central	Homeless service provider	Feedback Survey	See summary of feedback survey results below
Catholic Charities	Homeless service provider	Feedback Survey	See summary of feedback survey results below
Center for Advancing Domestic Peace	Domestic violence service provider	Feedback Survey	See summary of feedback survey results below
Chicago Rehab Network	Public or private organization that address fair housing, civil rights, and the needs of persons with disabilities	Feedback Survey	See summary of feedback survey results below

Chicago Street Medicine	Health care provider	Feedback Survey	See summary of feedback survey results below
Christian Community Health Center	Homeless service provider	Feedback Survey	See summary of feedback survey results below
Communities United	Public or private organization that address fair housing, civil rights, and the needs of persons with disabilities	Feedback Survey	See summary of feedback survey results below
Cornerstone Community Outreach	Homeless service provider	Feedback Survey	See summary of feedback survey results below
Good News Partners	Homeless service provider	Feedback Survey	See summary of feedback survey results below
Healthcare Alternative Systems (HAS)	Domestic violence service provider	Feedback Survey	See summary of feedback survey results below
Ignite	Homeless service provider	Feedback Survey	See summary of feedback survey results below
Illinois Chapter, AAP / Collaborative on Child Homelessness Illinois	Public or private organization that address fair housing, civil rights, and the needs of persons with disabilities	Feedback Survey	See summary of feedback survey results below
Illinois Public Health Institute	Private organization working on health and housing	Feedback Survey	See summary of feedback survey results below
Individual members of the Chicago CoC	Individual members of the Chicago CoC	Feedback Survey	See summary of feedback survey results below
Inner Voice	Homeless service provider	Feedback Survey	See summary of feedback survey results below

Interfaith Housing Development Corporation	Affordable housing developer/provider	Feedback Survey	See summary of feedback survey results below
North Side Housing and Supportive Services	Homeless service provider	Feedback Survey	See summary of feedback survey results below
Renaissance Social Services	Homeless service provider	Feedback Survey	See summary of feedback survey results below
Rush University	Health care provider; Public or private organization that address fair housing, civil rights, and the needs of persons with disabilities	Feedback Survey	See summary of feedback survey results below
Sarah's Inn	Domestic violence service provider	Feedback Survey	See summary of feedback survey results below
St. Leonard's Ministries	Homeless service provider	Feedback Survey	See summary of feedback survey results below
The Night Ministry	Homeless service provider	Feedback Survey	See summary of feedback survey results below
UI Health	Health care provider	Feedback Survey	See summary of feedback survey results below
Unity Parenting and Counseling Inc.	Homeless service provider	Feedback Survey	See summary of feedback survey results below

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

Summary of Chicago Continuum of Care Relief Funding Working Group recommendations:

Following the passage of the American Rescue Plan, the Chicago Continuum of Care submitted recommendations to the City of Chicago on funding needs to put Chicago closer to our goal of preventing and ending homelessness. Recommendations were for all ARP funding coming to the City and State, including both HOME funding and Coronavirus State and Local Fiscal Recovery Funds.

Specifically, the CoC Relief Funding Work Group prioritized the following program models:

Priority Area by Program Model	Description	Estimated Need	Recommended % of Funding
Permanent Supportive Housing Creation	Permanent Supportive Housing (PSH) is a housing model that couples non time-limited subsidies with tailored, intensive services and is a recognized best practice for ending homelessness throughout the country	The CoC Pipeline Committee established an estimated need for the addition of 4,200 PSH to our homeless system. Requested 5% of new units dedicated to survivors of gender-based violence.	64%
Acquisition and Rehab for Non-Congregate Shelter Creation	Non-Congregate Shelter (NCS) became a necessary part of community efforts to protect highly-vulnerable people experiencing homelessness during the COVID-19 crisis	DFSS funding supports approximately 1,100 beds that operate in congregate spaces with 20 or more people and shared bathrooms. Requested 10% set aside for survivors of gender-based violence.	21%
Tenant-Based Rental Assistance (TBRA) Voucher Creation	Tenant Based Rental Assistance (TBRA) can be used to subsidize housing options for people in need of housing, who are able to access their own supports to maintain housing through community-based services.	Initial surveys demonstrate that we can open up over 1,000 units of PSH by moving people in PSH on to other subsidy programs. Additionally, the Expedited Housing Initiative estimates that many people will need a subsidy once their time-limited subsidy ends. Requested 10% set aside for survivors of gender-based violence.	7%
Rapid Rehousing Creation	Rapid Rehousing (RRH) is a housing model that couples time-limited (up to 12 months)	The CoC Pipeline Committee established an estimated need for	5%

	subsidies with tailored, housing-focused services.	4,600 new RRH units to our homeless system. Requested 10% set aside for survivors of gender-based violence.	
Critical CoC Service Funding	Service funding is included in each category above, but in addition to services attached to program models, the CoC must also invest in system coordination, employment and income infrastructure and homeless diversion services.	Additional and ongoing support needed for the Employment & Income Navigator Project; Continued investment needed in Shelter Diversion; Need to fund staff to coordinate and manage funding, accountability, data management, and performance of programs.	3%

Feedback received from Feedback Survey

Following Community Feedback Sessions, DFSS and DOH shared a survey for any individuals or organizations to provide written feedback on the proposed allocation plan. We received 45 responses. Key themes identified are below:

- **Support for investment in permanent supportive housing (PSH), including both development of new PSH units and accompanying supportive services.**
 - The Chicago Coalition for the Homeless and representatives from various service providers submitted a recommendation to allocate \$34 million in HOME-ARP funding to create 75 units of permanent housing with supportive services for highly vulnerable doubled-up households.
 - A subset of responses recommend prioritization of returning residents and individuals with criminal records, particularly individuals required to register on the Sex Offender Registry. For example, one response stated “Returning citizens and reentry housing absolutely needs to be prioritized in the ARPA plans. Displacement and the instability of housing is one of the greatest factors which leads to recidivism and the lack of public safety.”
 - Other survey responses recommended prioritization of housing resources for survivors of gender-based violence; individuals in shelter; large families;; individuals who identify as LGBTQ+; and immigrants.
- **Support for investment in creating non-congregate shelter.** Several homeless services providers and health care providers submitted feedback that: “The current ARPA recommendations include funding to convert shelter slots into non-congregate environments which is a strong start in addressing some of the needs of unsheltered people.”

- **Recommendation for additional investment in supportive services for clients in shelter**, particularly to expand services to include “healthcare services within emergency shelters, inclusive of behavioral health services and medical care”; “transportation services to include individual pickup reservations, as well as routine pickups at healthcare facilities, community-based organizations, and public transit stations”; and “emergency shelter that has low/no barriers to entry.”
- **Recommendation for addressing unsheltered homelessness and its public health risks**, including “creating an official City of Chicago emergency shelter plan for extreme weather” and “expanding warming/cooling centers to 24 hours per day, including weekends.”
- Several responses indicated support for funding for non-profit operating capacity and non-profit capacity building. For example, one response stated, “I agree that there is the set-aside funding for non-profit operating capacity, capacity building, and administration and planning - without those resources, it will not be possible to deliver the services themselves.”

Feedback received in Community Feedback Session for people with lived experience of homelessness, housing instability, or gender-based violence

Twenty individuals participated in the Community Feedback Session for people with lived experience. Verbal input provided during the session is summarized below:

- The funding amount in question will not produce nearly enough resources to address homelessness
- Recommendation to expand eligibility and/or prioritize people with prior records for housing, including for perpetrators of sex-related crimes
- Increase the number of shelter beds for trans people
- Create a threshold for new jobs created with these resources to hire people with lived experience of homelessness
- Expand support for helping people living on the street to transition to housing
- Pursue racial equity
- Fund youth organizations to support youth experiencing homelessness or housing instability in providing their input and supporting them in ways they can end homelessness in Chicago

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: 7/3/2022***
- ***Public comment period: start date - 7/19/2022 end date - 8/5/2022***
- ***Date(s) of public hearing: 7/19/2022***

Describe the public participation process:

The City of Chicago adhered to its Citizen Participation Plan and the additional requirements set for HOME-ARP. This included a public notice in multiple languages that was released to the public on July 3rd, 2022, detailing the time and location of a public hearing that was held on July 19th, 2022 in a virtual format (Zoom). At the hearing, American Sign Language interpretation was provided, and translation services were conducted by request.

At the hearing, a draft version of the allocation plan was shared publicly to all registered participants as well as through each department's social media accounts. The allocation plan was also published on the OBM website at cityofchicago.org/grants.

Public comments made during the hearing were recorded and reported out in the final draft of the HOME-ARP Allocation Plan. Additional comments were accepted via mail or email. To submit a public comment, please address correspondence to the Office of Budget and Management (OBM), City Hall, Room 604, 121 N. LaSalle Street, Chicago, Illinois 60602, Attention: Latoya Vaughn, or send by email to GrantSupport@cityofchicago.org. If you have any further questions, please contact OBM at (312) 744-7755.

Describe efforts to broaden public participation:

Efforts to broaden public participation was done by sharing the public hearing date during the community feedback sessions, marketing the hearing via print and online media sources, as well as sharing information about the hearing through local aldermanic offices. Additionally, the hearing was conducted via Zoom to make the participation process accessible, as well as recording the hearing and sharing it on multiple department’s Youtube channels.

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

To be updated after the public comment process.

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

To be updated after the public comment process.

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:

Current Inventory of Homeless-Dedicated Beds, based on 2022 Housing Inventory Count

	Family		Adults Only	Vets
	# of Beds	# of Units	# of Beds	# of Beds
Emergency Shelter	1779	615	1986	75
Transitional Housing	616	240	650	183
Rapid Rehousing*	998	396	1171	159
Permanent Supportive Housing	4450	2006	4216	2063
Other Permanent Housing	112	16	81	19

*Includes temporary surge in Rapid Rehousing units funded with CARES Act funding.

Population Experiencing Homelessness, based on 2022 Point-in-Time Count

	# in Family HH (at least 1 child)	# in Adult HH (w/o child)	Veterans	Victims of DV
Sheltered Homeless	970	1637	203	222
Unsheltered Homeless	0	1263	119	13

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	591,615		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	79,549		
Rental Units Affordable to HH at 50% AMI (Other Populations)	221,626		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		129,835	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		77,935	
Current Gaps			+13,856

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:

HUD requires HOME-ARP funds be used to primarily benefit individuals and families in specified HOME- ARP "qualifying populations." Qualifying populations include the following:

1. **Homeless, as defined in 24 CFR 91.5;** which includes sheltered and unsheltered homeless populations
2. **At risk of homelessness as defined in 42 CFR 91.5**
3. **Those fleeing or attempting to flee** domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD in 24 CFR 5.2003 and outlined in the Trafficking Victims Protection Act of 2000 and amended in 22 U.S.C. 7102.
4. **Other Populations (further defined in its section below) which includes but is not limited to:**
 - Those currently housed populations at risk of homelessness
 - Other families requiring services or housing assistance or to prevent those at greatest risk of housing instability or in unstable housing situations

Homeless as defined in 24 CFR 91.5

In accordance with HUD's definition of homeless under the HOME-ARP grant, the City of Chicago will consider a homeless family or individual to generally include:

- An individual or family who lacks a permanent and adequate permanent home
- A person or family who will imminently lose their permanent home due to a lack of resources or support
- A youth under the age of 25, even if accompanied by an adult, that does not have a permanent home (and further defined in 24 CFR 91.5)

On a given night in Chicago, there are approximately 3,500 to 5,500 individuals experiencing homelessness, based on annual Point-in-Time Counts from the past five years. Additionally, there are over 11,000 people who have recently engaged with homeless services based on Chicago's Homeless Management Information System (HMIS).

In 2022, 33% of people experiencing homelessness counted were residing in unsheltered locations including on the street, encampments, public transportation, and other places not intended for human habitation. Black or African American households are disproportionately impacted by homelessness as they constitute 30% of Chicago's total population but 75% of individuals in the 2022 PIT Count. Approximately 11% of individuals identify as Hispanic or Latinx.

Roughly 75% of individuals experiencing homelessness are in adult-only households and 25% of people are in households with children. Based on the 2022 PIT Count, 16.2% of the population is under 18; 8.5% is 18-24; 25.4% is 25-40; 38.4% is 41-60; and 11.6% is over the age of 60. The population experiencing homelessness is disproportionately male: 67.2% of individuals identified as male; 32.1% identified as female; 0.5% identified as transgender; 0.2% identified as non-binary. Just over 16% of people reported a physical disability.

Of people experiencing homelessness counted, 332 (8.3%) were veterans.

At Risk of Homelessness as defined in 24 CFR 91.5

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability, like living in the home of another because of economic hardship or having been notified that their current living situation will be terminated within 21 days after the date of the application.

Based on data from the UChicago Inclusive Economy Lab Housing Stability Dashboard, Black and Latinx or Hispanic renter households in the Chicago area are twice as likely to report being behind on housing payments or having low confidence in their ability to pay next month's rent when compared to white households. And an analysis of demographic data from the city's Homelessness Prevention Call Center, which saw call volume double during the pandemic, shows that 75 percent of pandemic-era callers identify as Black.

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

The Illinois Domestic Violence Hotline, which is based in Chicago, received approximately 8,751 calls in 2021 from Chicagoans experiencing domestic violence and seeking supportive services.

In 2021, the City of Chicago, Department of Family and Support Services served over 11,000 individuals who were experiencing domestic violence through resource information advocacy, legal services, and other multi-disciplinary supports. Most of these individuals being served are Black or African American (40%) and/or Hispanic or Latinx (39.7%).

Although the City of Chicago does not break down demographic data by victimization, individuals that have experienced Human Trafficking overlap with the greater population experiencing other forms of violence and assault. It can be inferred that many people experiencing Human Trafficking in Chicago are either Black/African American or Hispanic/Latinx with White, Asian, or Native individuals experiencing Trafficking in smaller percentages.

On the 2022 Point-in-Time Count, 8.5% of the sheltered population reported being threatened or harmed by someone they know or fleeing a violent relationship. Based on national data, it is likely that this rate is higher than reported in this sample.

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

HOME-ARP qualifying populations also include other populations who have previously qualified as homeless, are currently housed with temporary or emergency assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness. In addition, HUD defines those at greatest risk of housing instability as households that have an annual income less than 30% AMI and are experiencing severe cost burden or have an income less than 50% AMI and meet a certain condition, like living in someone else's home or living in a hotel due to an economic hardship.

Residents served through Rapid Re-Housing (IV.4.1)

In response to COVID-19, the City of Chicago invested significant CARES Act funding to support a surge housing effort that has helped over 1,700 households achieve housing since beginning with a pilot in June 2020 and launching at scale in October 2020. This effort – referred to as the Expedited Housing Initiative (EHI) – is helping Chicagoans experiencing homelessness rapidly access housing and minimize the health risks of COVID-19. The CoC Relief Funding Work Group recommendations estimate that a subset of households served through EHI will need a subsidy once their time-limited subsidy ends. The population served by EHI were households at risk of severe complications or illness from COVID-19 as defined by the CDC, in line with the Chicago Coordinated Entry System prioritization policies adopted in response to the pandemic. The majority of households served by this expansion in RRH resources are single adults or couples (78%); 14% are families with children; and 10% are youth-led households (of which 2% are families). Each household in rapid rehousing has a unique experience of homelessness. Many households face complex situations with serious mental and/or physical health issues. Additionally, half of the households who entered EHI had no income.

Residents currently living in Doubled-Up Households (IV.4.2.ii.B)

In Chicago, just prior to the pandemic in 2019, there were 41,330 people who experienced homelessness while doubling up and in SY 2022 there were 14,934 students doubled-up in the Chicago Public Schools. Rates of doubling-up are significantly higher among Hispanic/Latino people compared to Non-Latino people. The Chicago Coalition for the Homeless estimates that 31% of the population doubling-up identify as Latino. Rates are also higher for Asian Americans compared to white people.

Residents with Justice System Involvement and returning from Incarceration (IV.4.2.ii.F)

Every year in Illinois, approximately 32,000 people return home from prison and 267,000 return home from pre-trial detention.

In Chicago, there are deep racial inequities in who experiences incarceration. More than 3.3 million people in Illinois have been arrested or convicted of a crime since the advent of mass incarceration.

Nearly 28.9% of people arrested or convicted of crimes in IL are black even though they represent 13.8% of the population.

For black women, this impact is compounded with 34.3% arrested or convicted in Illinois, but they only make up 14.5% of all adult women. Mass incarceration also has had a disproportionate impact on Hispanic and Latinx communities, however, due to insufficient data, there is not an estimate of the number of Latinx adults living with records in Illinois.

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

The HOME-ARP allocation plan was created within the context of other Chicago Recovery Plan investments to address needs of the qualifying populations, see below:

New Investment	Description	Funding Amount
Permanent Supportive Housing	Development of new permanent supportive housing units	\$35M City-issued General Bond
Shelter Infrastructure Investments	Infrastructure investments to repair and renovate Chicago's homeless shelters, including conversion into non-congregate configurations.	\$20M City-issued General Bond
Non-congregate facilities	Acquire non-congregate facilities for use as non-congregate shelter, with potential conversion to permanent supportive housing	\$30M City-issued General Bond
Rapid Re-housing for households experiencing homelessness	Rapid rehousing services for households experiencing homelessness, including housing location, rental subsidy, and case management services to help households rapidly exit homelessness to housing.	\$20M ARP LFRF
Rapid Re-housing for survivors fleeing violence	Help survivors of gender-based violence seek safety and stability through rapid re-housing and wrap-around services	\$5M ARP LFRF
Emergency Financial Assistance	Direct cash to support the immediate needs of survivors of gender-based violence such as	\$5M ARP LFRF

	transportation, childcare, or emergency medical costs	
Legal Services	Legal representation and administrative legal support for survivors of gender-based violence	\$4M ARP LFRF
Victim services for young people	Wrap-around services to support young people (0-17yo) who have been impacted by gender-based violence	\$5M ARP LFRF
Prevention education	Tailored, culturally specific prevention education for both students and caregivers on gender-based violence	\$1.2M
High Utilizer Diversion Housing	Create a temporary housing program, staffed with medical and mental health providers, for individuals with complex and often co-occurring Severe Mental Illness, Substance Use Disorder, or other medical needs	\$12M ARP LFRF

Describe the unmet housing and service needs of qualifying populations:

The main gaps within the system are

1. Unmet need of non-congregate shelter availability
2. Inadequate supply of low barrier permanent supportive housing
3. Unmet need of affordable rental housing stock for renters seeking stable housing and
4. Unmet need of long-term housing stability case management for households in permanent supportive housing.

Homeless as defined in 24 CFR 91.5

Housing need has been established by the CoC Pipeline Committee, a working group of the Chicago CoC that analyzed homeless population data to identify the number of Permanent Supportive Housing, Rapid Rehousing, and Diversion units needed to effectively end homelessness in Chicago. The CoC Pipeline Committee estimates a need for:

- 4,200 new Permanent Supportive Housing units
- 4,600 new Rapid Rehousing units

Chicago also needs improvement of the infrastructure of its shelter system to adequately serve households experiencing homelessness safely and with dignity. Prior to the pandemic, there were approximately 4,500 temporary beds in Chicago, of which DFSS funding supported roughly 3,300. Of these shelter beds, approximately 1,100 beds were in congregate spaces with beds for 20 or more people in one room and shared bathrooms. For the single adult population, over 80% of beds were in shared rooms with over 20 people and shared bathrooms.

In line with public health guidance, Chicago has decompressed its congregate shelter spaces to allow for physical distancing, leading to a loss of roughly 400 beds for single adult men and women. In general, congregate spaces also carry higher risks for transmission of COVID-19 and other transmissible diseases among a vulnerable population.

Based on recent Point-in-Time (PIT) Counts, 1,260 to 1,529 individuals in Chicago have been identified as sleeping in unsheltered locations, such as encampments, public transportation, the street, or their car on a given night. Service needs include accessible and low-barrier shelter and health care including behavioral health care and medical care. Individuals experiencing unsheltered homelessness were adversely impacted by the pandemic which reduced their access to businesses and non-profit organizations for key service needs including food, water, bathrooms, and safe spaces. Barriers to accessing human services for unsheltered individuals can include lack of reliable means to communicate, e.g., a cell phone, or reliable transportation to service locations. Common barriers can also include distrust of government services, previous experiences of trauma, and mental illness or substance use disorder.

Another priority population within the population experiencing homelessness is older and medically vulnerable adults. Greatest service needs include non-congregate shelter to reduce their risk of contracting COVID-19 and access to health care. Common barriers that this population may face when trying to access services are mobility challenges and need for spaces that can provide appropriate accommodation. On the 2022 PIT Count, 16% of shelter guests on the night of the Count reported a physical disability. An unmet need in the system is program capacity to provide appropriate care for individuals with illness or injury which does not require hospitalization but requires greater care than can be treated in a shelter environment.

At Risk of Homelessness as defined in 24 CFR 91.5

One of the primary unmet housing needs is access to affordable housing with the City of Chicago. Low affordable housing stock and increased rent costs have made it difficult for persons at risk of homelessness to obtain safe, affordable housing in order to resolve their housing crisis. A report by the National Low Income Housing Coalition (NLIHC) and Housing Action Illinois shows that there are only 39 affordable and available rental homes for every 100 extremely low-income households in Illinois.

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

In 2021, approximately 3,708 Chicagoans called the Illinois Domestic Violence Hotline seeking shelter. Despite this need, there are only 283 domestic violence shelter beds between the City of Chicago and the Continuum of Care.

Barriers to accessing services can include concerns about safety, as well as barriers faced by many individuals and households experiencing homelessness such as language barriers, ADA accessibility, transportation access, experiences of trauma, and mobility or health needs.

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

Doubled-Up Households

A large percentage of these doubled-up households eventually land in Chicago's shelter system. In an analysis of data from 2013-2017, the Inclusive Economy Lab found that between 49-58% of households served in our shelter system were previously living doubled-up. Current resources for doubled-up households in Chicago include:

- As part of a collaborative effort led by the Mayor's Office, the Chicago Coalition for the Homeless, the Department of Family and Support Services, and the Corporation for Supportive Housing, funding from the City's Shared Housing Ordinance provides permanent supportive housing for 100 families of Chicago Public Schools students experiencing homelessness. This initiative offered permanent supportive housing with case management services. Families receive a long-term housing subsidy, in addition to supportive services coordinated by a caseworker charged with utilizing a trauma-informed and strengths-based approach.
- Chicago Public Schools allocated \$9 million in federal relief funds to create the Chicago Families Forward Fund to provide a one-time microgrant of \$500 to 18,000 eligible CPS students experiencing housing insecurity. All of the students enrolled in Chicago Public Schools Students in Temporary Living Situations (STLS) program were eligible to receive this grant.

Returning residents

Returning residents face systemic barriers to stable housing, as evidenced by the high representation of formerly incarcerated individuals within Chicago's unhoused population. Black Chicagoans face a disproportionate burden regarding housing upon reentry, given the overrepresentation of Black people both within the incarcerated and unhoused populations. We do not have enough available affordable permanent housing placement for men and women exiting the Illinois Department of Corrections and the Sheriff's Office which results in a greater likelihood of individuals ending up in a cycle of housing instability and subsequent incarceration.

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

Shelter Inventory Gaps

Chicago has 5,031 beds in emergency shelters and transitioning housing programs, according to the 2022 Housing Inventory Count. Compared to pre-pandemic shelter capacity, Chicago has approximately 400 fewer shelter beds to serve single adults. In order to restore pre-pandemic capacity and improve shelter stock to better serve clients experiencing homelessness, Chicago needs to transition shelter space for approximately 1,100 beds from congregate settings to non-congregate settings.

Housing Inventory Gaps

Current homeless-dedicated bed capacity is 2006 units of Permanent Supportive Housing for families and 4216 beds of Permanent Supportive Housing for single adults. The Chicago CoC Pipeline Committee estimates need for an additional 4,200 PSH units to sustainably address homelessness in Chicago.

There is also need for housing inventory outside of the population qualifying as homeless. Data from over a four-year period of study across the emergency health, housing, and justice system have been linked to provide unprecedented insights into the true scope of utilization, both the amount of cycling high users and service utilization patterns. From that data, we have learned that of the people cycling in all three sectors, only 15% accessed permanent housing in the Continuum of Care.

The Road Map Initiative team conducted systems process mapping and engaged people with lived experience to gain insights into the scope and breadth of the people cycling across these emergency systems. They found that just 2,468 cycled across all three systems. About half (1,232) were considered a high user of at least one system or were interacting at a comparatively high rate across all three systems. These 1,232 individuals consumed nearly \$300 million in crisis services over a four-year period. This population is predominantly male (86%); 84% are black and 79% are over the age of 45.

What we've learned is that we do not have enough available affordable transitional, permanent, subsidized, and family housing placement options for men and women exiting the Cook County Sheriff's Office which results in greater likelihood of individuals ending up in a cycle of housing instability and subsequent re-incarceration. Collective analyses gathered in RMI stakeholder meetings reveal that our systems do not offer comprehensive housing plus supports for the people likely to have substance use disorder (SUD) as their primary health diagnosis, specifically Alcohol use Disorder (AUD), *unless* they were already in treatment.

For example, not all Chicagoans in Cook County Jail who do not have a residence upon release qualify as considered homeless and therefore aren't able to access homeless-dedicated housing programs. Incarceration also impacts chronic homeless status, which is an eligibility criterion for many existing PSH programs.

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:

Enter narrative response here.

Identify priority needs for qualifying populations:

Enter narrative response here.

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:

Shelter Inventory Gaps

Level of need for non-congregate shelter based on loss of beds, due to shelter decompression in line with COVID-19 public health guidance, compared to pre-COVID capacity as well as consideration of other available resources to improve shelter infrastructure.

Housing Inventory Gaps

Housing inventory need was interpreted as demand for affordable housing. HUD’s CHAS table generator was used to determine this demand by estimating the number of households at 30% and 50% AMI with at least 1 severe housing problem, per the HOME-ARP housing need analysis table template included in the plan template document.

Gaps were measured as level of need less inventory. Inventory was estimated by analyzing 2019 PUMS data to identify total units available to low-income renters (30% and 50% AMI) that said renters could afford without spending more than 30% of their income on rent.

This analysis indicates that there is a housing gap at 30% AMI (approximately 50,000 units), but a housing surplus at 30-50% AMI. However, this analysis does not take unit size (e.g. number of bedrooms) into account, nor does it measure the degree to which higher income renters are occupying more affordable units and creating a gap for residents in the 30-50% AMI income range. Other data sources suggest that this gap is quite large: approximately 3 in 4 Chicago families in the 30-50% AMI bracket report being rent-burdened—around the same ratio as <30% AMI families.

For level of need for homeless-dedicated housing, Chicago relies on the CoC Pipeline Committee, a working group of the Chicago CoC that analyzed homeless population data to identify the number of Permanent Supportive Housing, Rapid Rehousing, and Diversion units needed to effectively end homelessness in Chicago.

Lastly, community input identified a starting need of 75 units of Permanent Supportive Housing for doubled-up households.

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:

The City of Chicago will release one or more requests for proposals (RFPs), requests for qualifications (RFQs), or other solicitations to select partners, developers, service providers, and contractors to administer the HOME-ARP grant. The Department of Housing, the Department of Family Support Services, and/or their partner procurement teams at the City of Chicago (Office of Budget and Management, Office of Procurement Services) will draft and publish such solicitations publicly. Solicitation publication, review, and selection will follow standard city policies that promote diversity in applicants, local hiring, and timely and cost-effective implementation.

Solicitations will indicate as needed the qualifying populations intended to be served by the RFP, the referral methods expected to be used for connecting residents to services and/or units, and other information as needed to maintain compliance with HOME-ARP requirements.

Describe whether the PJ will administer eligible activities directly:

All eligible HOME-ARP activities will be directly served by subrecipients/contractors selected through the City's competitive procurement process. The City of Chicago and selected subrecipients will provide program delivery administration support.

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

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 10,000,000	14.1%	
Acquisition and Development of Non-Congregate Shelters	\$ 20,000,000	28.1%	
Tenant Based Rental Assistance (TBRA)	\$ 6,000,000	8.4%	
Development of Affordable Rental Housing	\$ 25,670,234	36.1%	
Non-Profit Operating	\$ 3,000,000	4.2%	5%
Non-Profit Capacity Building	\$ 1,500,000	2.1%	5%
Administration and Planning	\$ 5,000,000	7%	15%
Total HOME ARP Allocation	\$ 71,170,234		

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

Through the consultation process, data acquired for the gap analysis, and the historic work that the City has conducted in this realm, the City of Chicago allocated funds (as referenced in the chart, above) based on the priority needs of the community.

The majority of the grant will support the development of affordable housing units. This aligns with the unmet need for affordable housing as mentioned in our gap analysis section as well as the overwhelming community input for permanent supportive housing units.

The second largest percentage of funds are allocated to the acquisition and development of non-congregate shelters. This aligns with our consultation process and unmet needs for non-congregate shelter beds as mentioned in our gap analysis.

The remaining percentage of the grant was determined from the needs assessment and consultation process as supportive services was considered a priority from the community while TBRA will help diversify pathways into stable housing.

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:

Many doubled-up families try to access homeless services only to be turned away because they don't meet the definition of homelessness. Existing entry points could be tracking households living doubled-up and their contact information even if they are not eligible for COC housing. Those points of entry include: Skilled Assessors, Homelessness Prevention Call Center, and Domestic Violence Help Line.

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:

The City of Chicago estimates the development of 93 new permanent supportive housing units for the qualifying populations outlined in our plan. This estimate is based on recent LIHTC projects that the Department of Housing has invested in.

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

The addition of 93 new low-barrier permanent supportive housing units will allow the City of Chicago to serve the qualifying populations outlined in our plan.

The Department of Housing will work with developers and local-non-profit entities to construct affordable rental units for qualifying populations and low-income residents in Chicago.

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:

The City of Chicago intends to give preference to the following:

Acquisition and development of non-congregate shelters

Preference will be given to non-congregate shelter projects designated to serve QP1 (Homeless) and QP3 (Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking).

Tenant based rental assistance

Preference will be given to QP4 (Other populations), specifically to the subpopulation of households who have previously been qualified as homeless, are currently housed due to temporary or emergency assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness. Note that this population includes individuals fleeing domestic violence who are currently housed with temporary or emergency assistance.

Development of affordable rental housing AND Supportive services

Preference will be given to housing projects that are designated to serve one of the following qualifying populations:

- QP1 (Homeless)
- A subpopulation of QP1 (Homeless) of individuals who have previously been incarcerated
- A subpopulation of QP4 (Other Populations) of households that are “doubled-up”, defined as having an annual income less than or equal to 50% of the area median income AND living in the home of another because of economic hardship. (IV.4.2.ii.B)

- A subpopulation of QP4 (Other Populations) of returning residents defined as having an annual income below 30% of area median income; having insufficient resources or support networks to prevent them from moving to an emergency shelter or other homeless destination; AND is exiting a publicly funded institution or system of care. (IV.4.2.ii.F)
- QP3 (Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking)

Preference will be given to accompanying supportive services projects that are designated to serve the qualifying populations described above for housing projects.

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:

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): Chicago intends to use a combination of the Coordinated Entry System and alternative referral systems, particularly for the other qualifying populations.

Non-congregate shelter

Sub-recipients will be responsible for soliciting referrals from appropriate services to serve eligible populations, with prioritization to serve QP1 (Homeless) and QP3 (Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking).

Tenant based rental assistance

Sub-recipient(s) for HOME-ARP TBRA program(s) will be responsible for soliciting referrals from appropriate sources to serve eligible populations, with prioritization to serve households who have previously been qualified as homeless, are currently housed due to temporary or emergency assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness. If additional assistance is available beyond the prioritized population, the sub-recipient will be responsible for accepting applicants from all qualifying populations and serving in chronological order of application.

Development of affordable rental housing AND Supportive services

Sub-recipients for permanent supportive housing projects and associated supportive services will be responsible for soliciting referrals from appropriate services.

- Projects dedicated to serving QP1 will take direct referral from the Chicago Coordinated Entry System, including identification of a subpopulation of clients who have previously been incarcerated.
- The Chicago Coordinated Entry System uses a standardized assessment to prioritize households for housing resources. The current prioritization plan is available at: <https://www.csh.org/wp-content/uploads/2020/08/CE-Temporary-Prioritization-Plan-2.0.pdf>.
- Projects dedicated to serving QP3 will take direct referral from the Chicago Domestic Violence Coordinated Entry System.

- Projects dedicated to serving doubled-up households within QP4 will take direct referral either from an expanded Chicago Coordinated Entry system or from relevant sources to the project
- Projects dedicated to serving the reentry subpopulation of QP4 will receive referrals from relevant organizations (e.g. Illinois Department of Corrections, community-based organizations serving returning citizens).

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):

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):

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):

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:

N/A

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:

N/A

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):

N/A

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:

- *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.*

N/A

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

N/A

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

N/A