

# Auburn-Lewiston HOME Consortium

## HOME-ARP PY21 Allocation Plan



# HOME-ARP Allocation Plan

## Program Year 2021

Prepared by: Auburn-Lewiston HOME Consortium  
July, 2022

This plan was created utilizing the HUD CPD template provided, including questions and tables, as well as the 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. Also submitted with this plan are the SF-424, and the related certifications. References to “ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

### Award Amount

The Auburn-Lewiston HOME Consortium (ALHC) is a Participating Jurisdiction (PJ) recognized by the US Department of Housing & Urban Development (HUD). The ALHC will receive \$1,700,829 in HOME-American Rescue Plan (ARP) funding. These funds are to be distributed by the city of Auburn to the ALHC Members in accordance with this Allocation Plan.

### Consultation

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

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

The Auburn-Lewiston Home Consortium (ALHC) employed the following three tactics to collect meaningful and informative data regarding the size, demographic makeup and unmet needs of the local population. First, staff sources all traditional statistical data sources including federal census numbers, American Community Survey (ACS) and the Comprehensive Housing Affordability Strategy (CHAS) data as well as local data compiled by the Maine State Housing Authority (MSHA).

Secondly, staff reached out to local homeless service providers, community advocates, educational institutions, veterans’ groups, community action programs, state agencies, domestic violence organizations, public housing authorities, mental healthcare providers and various housing navigators operating at organizations throughout the jurisdiction. This outreach included an overview of the qualified population as defined by HUD in CPD notice 21-10 as well as potential situations in which these populations may be encountered which they may not have considered in the past. This outreach concluded an appeal to these organizations to provide quantifiable data on hand or anecdotal narratives which may serve to highlight unmet needs regularly encountered. From this outreach culminated a number of formal and informal letters and consultations providing qualitative as well as quantitative data not represented or considered within the traditional data sources noted above.

The third approach was to release a broad community survey focused specifically on the impact of Covid-19 on access to adequate housing and essential services. This survey was circulated in 5 languages, utilizing digital as well as paper surveys distributed at key service points within the city including food pantries, youth centers, head start service providers and municipal offices. The result was over 362 households encompassing over 1,000 residents being completed.

This locally sourced survey data coupled with the formal or informal correspondence from local service providers was at times contradictory to the traditional data sources. Still, it aided in the development of a plan which is fixated on providing direct responses to the below identified needs. Through consultation and continued collaboration and data sharing with the MSHA HUB Coordinator, the Coordinated Entry system of the Continuum of Care and the various housing navigators operating at various specialty service providers within the jurisdiction the ALHC will be able to better compile accurate, local assessments of need. Sharing these methodologies and conclusions with MSHA and other state and federal level offices will improve the ability to assess and address homeless & at-risk populations.

***List the organizations consulted:***

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Maine Continuum of Care (MCoC)</b>	Continuum of Care	Participated in virtual meeting with 59 people attending representing 24 service provider organizations – 10/27/21	Need to continue rental assistance programs and asses missing connections through a diversity, equity & inclusion lens. Provide direct outreach to landlords to assist development or improvement of new units. Need relaxed criteria for LMI populations.
<b>Lewiston-Auburn Landlord Association</b>	Private Org addressing housing	Attended regular meeting with 26 landlords. – 1/25/22	Need for more rehab programs with relaxed criteria to improve or add new units. Need relaxed zoning to allow for additional units. Need to

			remove sprinkler requirements for older buildings.
<b>Auburn Housing Authority</b>	Public Housing Authority	Discussions with Director	Needing increase in voucher funds for Section 8. Additional funding from HOME program for new unit development projects is needed to add to inventory.
<b>PAL Center</b>	Agency which addresses needs of Qualified Populations: Homeless, At-Risk & Other	Discussions with Director/ Survey Distribution Center	Need for additional funding to continue food pantry and senior services.
<b>Auburn Police Department</b>	Agency which addresses needs of Qualified Populations: Homeless, At-Risk, DV & Other	Discussions with Police Chief	Department needs greater assistance to comply with new Homelessness Crisis Protocol. Additional Co-responders with mental health, substance abuse or housing focus will provide for better incident outcomes and follow-up services.
<b>Community Concepts Inc.</b>	Agency which addresses needs of Qualified Populations: Homeless, At-Risk & Other	Consultation with Program Director	Discussed needs of QPs and current Emergency Rental Assistance counts and program sunset concerns.
<b>Community Concepts Finance Corp</b>	Agency which addresses needs of Qualified Populations: Homeless, At-Risk & Other	Discussions with Program Manager and review of Community Needs Assessment.	Needed increase in homeownership counseling and financial capability training for tenants to move into homeownership. Establish referral network for new tenants and tracking of completed educational opportunities.
<b>Auburn Fire Department</b>	Agency which addresses needs of Qualified Populations: Homeless, At-Risk, DV & Other	Discussions with Fire Chief	Direct data points indicating 34% increase in interactions with Homeless individuals & 87% dealing with substance abuse, mental health and exposure. Additional co-responder and follow up services is needed.
<b>Auburn Adult Education</b>	Agency which addresses needs of Qualified	Consultation with Assistant Director	Additional funding and services are needed for continued educational and job preparedness training. This includes transportation services to

	Populations: At-Risk & Other		and from training and early work- placement programs.
<b>New Auburn Neighborhood Watch</b>	Neighborhood group	Meeting on 4/28/22	18 residents attended. Comments supporting section 8 voucher program, question on how to achieve local adult homelessness counts, cost savings if city consolidated shelter programs.
<b>Androscoggin Head Start</b>	Agency which addresses needs of Qualified Populations: At-Risk & Other	Survey Distribution Center	Need to fill gaps for middle income residents and support services for LMI families and single parents.
<b>Lewiston Housing Authority</b>	Public Housing Agency	Consultation with HUB Coordinator	Need to integrate local actions and activities with the COC. HUB Coordinator cannot provide direct service. Case management needed to better count and facilitate services.
<b>Lewiston Homelessness Committee</b>	Organization addressing Fair Housing, Civil Rights and/or needs of persons with disabilities	Consultation with Committee Chair	Discusses options for transitional housing development as well as zoning and shelter options.
<b>Veterans Inc.</b>	Veterans Group	Consultation with Staff Grantwriter	Not enough resources to meet the increased number of homeless or at- risk veterans with their pandemic- related federal financial assistance ending in July of this year. Funding needed to supplement homeless veterans transitional housing programs as well as increased operational costs. Seeing a 17% increase in veterans served in transitional housing program so far this program year.
<b>Preble Street Veterans Services</b>	Veterans Group	Consultation with staff	Provided feedback regarding housing service needs and latent job training opportunities.
<b>Emergency Quarantine Shelter</b>	Homeless Service Providers	Consultation with Managers – 3/17/22	Current service data on population counts and demographics. Recommends additional transitional housing and low barrier shelter development.
<b>Trinity Jubilee Shelter</b>	Homeless Service Providers	Consultation with Executive Director	Not enough housing to use with vouchers; not enough readily accessible mental health case

			management services, program expansion estimated to serve at least 50 people per year; accessible overnight shelters that do not require guests to climb stairs to enter building and/or sleeping area; need for trainings relating to de-escalation and incentives to serve the mentally ill; need for shelters to participate in HMIS to provide robust, accurate data, offer proof of the scale of the homelessness issue, and possibly increase funding for homeless services; need for public restrooms/showers that would likely be used by more than 60 homeless people per year; and need for laundry access for at least 75 homeless people per year wash clothing and bedding.
<b>New Beginnings</b>	Homeless Service Providers	Feedback from Executive Director	Not enough services – shelters or housing – available to help youth exit homelessness. Funding needed for additional staffing positions for existing services; creation of new or expansion of existing support services facilities to address non-daytime weekday needs and service of individuals who are excluded by current age or other restrictions in existing programming. Significant unmet need for a) affordable housing; b) support services; and c) shelter resources.
<b>Lewiston School Department</b>	Agency which addresses needs of Qualified Populations	Consultation with District Resource Coordinator	Approximately 300 youth are identified as homeless or at risk for experiencing housing disruption. The Store Next Door provides hygiene items, clothing, food, gift cards for cabs/groceries, and school supplies which are funded with community donations. Funding needed to expand program offerings.
<b>Pinetree Legal</b>	Organization addressing Fair Housing, Civil Rights and needs of	Consultation regarding Fair housing	Direct discussions and resource development regarding fair housing services and legal aid.

	persons with disabilities.		
<b>Androscoggin EMA</b>	Agency which addresses needs of Qualified Populations: At-Risk	Consultation with County EMA Director	EMA has new directives on development of Emergency housing plans. Shared quantified data on estimated emergency shelter needs.
<b>Safe Voices</b>	Domestic Violence Service Providers	Consultation with Director of Shelter and Housing Services	Provided data on sheltered counts and local unmet demand. Support if housing in the form of security deposits and housing resources is needed.
<b>Lewiston Fire Department</b>	Agency which addresses needs of Qualified Populations: Homeless, At-Risk, DV & Other	Consultation with Fire Chief	Most frequent adverse housing events are unsafe housing and sanitary issues for persons housed in units that are not suited to their physical conditions. Lack of housing for physically impaired persons. Long waitlist for Section 8 and other government assistance.
<b>Lewiston Police Department</b>	Agency which addresses needs of Qualified Populations: Homeless, At-Risk, DV & Other	Consultation with Police Chief	Better funding is needed to provide resources to the homeless population, including better services for mental health, substance misuse, and housing. Project Support You (PSY) has 1 1/2 positions and needs the other half position funded to provide additional on-scene crisis de-escalation and mental health resources, connect individuals with ongoing treatment options, and resources to officers to address crisis calls. Funding is needed for counseling resources to address current legislation directing law enforcement to encourage counseling and resources versus arrest or issuing citations. Other needs include reimbursement for emergency hotel vouchers (weekends/holiday); wrap-around services inclusive of a temporary shelter, drug/substance abuse counseling, and shelter for those seeking protection from an abuser; affordable housing; and support for those experiencing substandard rental units.

<b>LA Housing System Collaborative</b>	Organization addressing Fair Housing, Civil Rights and needs of persons with disabilities.	Community Discussion Forum - 5/3/22	Worked with other housing system stakeholders to develop new structures and systems for inter-organizational communication and coordination.
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***Summarize feedback received and results of upfront consultation with these entities:***

Through this consultation process the ALHC identified early on that the traditional assessments and sources of data would not adequately demonstrate a modern GAP analysis for the identified Qualified Populations (QPs) for two specific reasons. First, traditional sources of data, such as the American Community Survey (ACS) or the Comprehensive Housing Affordability Strategy (CHAS) were most recently completed in 2019-20, prior to the onset of the Covid-19 pandemic. Second, the ongoing impact of the Covid-19 pandemic has negatively impacted more recent efforts to update this traditional data, including regional Point in Time (PIT) studies. Many of these annual studies have been put on hold altogether, or recent surveys have demonstrated detrimentally small respondent numbers.

For example, the scope of the 2021 Point-in-Time Youth Addendum Survey conducted by MSHA was reduced to only 25 individuals due to the Covid-19 pandemic. This survey sample represents only 0.4% of the number of homeless clients MSHA recorded as sheltered in the 2020 statewide counts. Further, through direct consultation with the local School Department 69 Auburn and 196 Lewiston homeless students within the district have already been qualified as of March 2022, with another 20 cases still being confirmed. The current year combined totals of McKinney-Vento qualified students between both Auburn and Lewiston school systems are already in excess of 265. This is, according to the direct service providers consulted in the development of this plan, still the tip of the unmet need iceberg.

The second apprehension with current statewide data points is the waiver to skip the current year unsheltered population counts. Attempting to develop an emergency service plan to address the needs of the increasing homeless and at-risk population while waiving the continued collection of data is problematic. Firstly, without consistent measurements any new data points have no baseline for change which can reasonably be relied upon. For example, Maine’s Plan to End & Prevent Homelessness as amended in 2017 estimates the population statewide at 7,020 based on HMIS data and asserts that 98% of those are currently serviced within shelters. This data was updated again in 2021 within the Homeless System Re-Design Initiative. This final report and recommendations are based on a total, statewide population in need of only 4,497. This 36% reduction in need is directly contradictory to local data recently collected. What this data does show is that the current shelter and transitional housing system is clogged with current residents and service recipients which are unable to exit the subsidized housing system and related services.

By using data generated by the Auburn Fire Department’s incident reporting system the ALHC confirmed officers had 198 separate encounters with homeless individuals from March 2020 to March 2022 with the second year containing 113 recorded encounters. This establishes a 34% increase from the previous year, a relation directly inverse to the trend demonstrated by state-level assessments. The ALHC understands this count does not establish a more accurate total, nor



does it include all potential homeless or at-risk populations. What it does do is further corroborate the view statewide data, as compiled by MSHA, is insufficient to assist if not detrimental to the development of a true needs-based plan.

What is more useful to establishing priorities within the Auburn-Lewiston Consortium is data generated locally and what can effectively incorporate these new data sources including first responders and volunteer program services. For example, of the 51 contacts with homeless individuals that the Auburn Fire Department serviced in the last 3 months, 87% of those involved substance abuse, Anxiety/psychiatric individuals, or those with exposure to the elements. Not only does this total eclipse the PIT counts provided by MSHA, but clearly demonstrates the unsheltered population, which is currently not being counted, is suffering to the extent that EMTs from the local fire departments have to intervene on a routine basis to address the needs of this population, including substance abuse, mental health and exposure.

Unfortunately, after treatment these individuals are released back into the unhoused population with little to no follow-up support or continuation of services being provided. What is needed, and what this plan lays out for response, is the development of new field service providers whose roll will be to take these self-generated or referrals from first responders and provide the needed follow up and direct service care in order to address the un-met needs of unhoused populations with the end result to facilitate the client's transition into the Coordinated Entry (CE) system either via the HUB Coordinator or the housing navigators housed within one of the specialty service providers.

There has been substantial evidence that the local homeless service providers are not committed to utilizing the HMIS system which MSHA relies on to compile their counts. In response, this plan outlines a dedicated pre-entry and co-responder system that can count, assess, and serve the unsheltered population where they are with an end goal of referring them to the most appropriate service providers and Housing Navigators that can best meet their needs.

## **Public Participation**

***Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:***

- ***Date(s) of public notice: 7/14/2022***
- ***Public comment period: start date – 7/14/2022 end date – 8/1/2022***
- ***Date(s) of public hearing: 8/1/2022  
5/2/2022***

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

Traditional public participation process, including posting of the proposed plan in its entirety, holding public hearings and public comment period have been expanded to additionally include multiple community outreach efforts as documented above. ALHC staff sent direct requests to area service providers which highlighted all of the potential uses of the program funds and outlined the qualified populations. Staff also conducted multiple listening sessions within both cities hosted at city council meetings, neighborhood

watch events and housing focused meetings. The efforts to broaden this participation from the mandated minimum will be more thoroughly described below.

Evidence of public posting and appeals for input will be placed here after the Public Comment Period closes.

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

Prior to the development of the Home-ARP and the Auburn-Lewiston HOME Consortium Annual Action Plan a comprehensive community needs survey was circulated in 5 languages. This survey method utilized digital as well as paper surveys which were distributed at key service points within the city including food pantries, youth centers, head start service providers and municipal offices. The result was over 362 households including over 1,000 residents being received. This information, along with consultation efforts with area service provider partners helped craft the plan as presented.

The consultation process also entailed direct correspondence with dozens of area service providers. By educating them on the specifics of the qualified population as defined by HUD in CPD notice 21-10 this outreached further solicited quantifiable or anecdotal narratives which may serve to highlight unmet needs they regularly encounter.

Additionally, ALHC staff held listening session at multiple community neighborhood meetings and events as indicated above.

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

Numerical data developed through the community survey will be summarized within the GAP analysis below. A selection of narrative input received during the local survey is included below. This input, sourced from over 1,000 households across two surveys, was key to filling data gaps caused by the Covid-19 pandemic and demonstrates the changed landscape residents and service providers need to navigate and adapt to in order to better address the needs of at-risk and homeless populations.

- The prices of housing has increased substantially. Between prices of rent and goods we can barely make ends meet.
- Public transportation is severely lacking in Auburn especially in the evening.
- Lack of home health care due to staffing shortages and issues around quality healthcare
- Loss of jobs due to school closure and lack of adequate affordable childcare.
- I'm on a fixed income and looking into elderly housing but the waiting lists are so long
- My father and brother are living with me because they cannot find housing.
- Can't afford car upkeep or bills
- Can't access programs to help
- Don't have money for food medication and bill. Need help with property taxes
- I went to through the process the rent assistance is on average six to eight weeks late via community concepts. The landlords get frustrated and toss the clients even if they share the applications to the program.

- folks are taking their important items and moving into their vehicles and sleeping in parking lots around auburn where they won't be harassed. I know of at least 500 vehicles at least some are couch surfing when possible or in for medical reasons, so their cars are parked around the hospital.
- I have a son with a disability who currently lives an hour away. For safety reasons he needs to be closer to us. He is on a ridiculously long waiting list for low-income housing.
- Rising costs have put me back to living paycheck to paycheck and seeking a second job. Pre-covid I lived comfortably on my single income. The cost of food is outrageous. I pay more for CMP delivery charges than I use in electric.
- There's a gap for kids who qualify for Headstart and those who don't. There is a long waitlist for many [childcare] providers.
- People don't know there's help out there and they are hard to navigate.
- People don't know about services. We have so many services, but they all work solo. None are working together.
- Covid-19 exacerbated food issues. People who were hurting are hurting more now.

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

No comments or recommendations were intentionally dismissed. Some responses or recommendations derived either from the community surveys or through direct consultation with area service providers did contain demonstrations of unmet need which are unable to be addressed given the restrictions on funding availability or individuals whom do not fall within the Qualified Population as defined by HUD. In these cases, consideration is taken, and priority of funding is established as available.

**Needs Assessment and Gaps Analysis**

The Auburn-Lewiston Home Consortium includes the entirety of both cities. Much of the data provided at the state level is by Androscoggin County or as the Lewiston-Auburn Metropolitan Statistical Area (LAMSA), which includes 12 surrounding municipalities. Both Auburn & Lewiston serve as a regional service HUB for the area meaning that even though HOME-ARP funds are designated for residents of the two cities, the needs of these cities is impacted by the spillover, or centralization of needs from the surrounding rural populations. The two emergency shelters recently operated in Lewiston during the Covid-19 pandemic corroborated this fact by reporting that 20% of their population cited towns outside of the PJ as their residence.

The American Community Survey (ACS) data calculated a total population of the jurisdiction as 59,425 in 2020. This accounts for 53% of the population of the entire county of Androscoggin being housed on only 20% of the total area. For this reason, and as further demonstrated by residency data provided by the two Emergency Shelters, this plan takes into account the expected spillover of needs from the total LAMSA. An additional concern with the data utilized is that the county level data provided by MSHA is still derived from the 2015-2020 American community survey. Most of this data provided by ACS was compiled pre-covid and the recent and dramatic shifts in household income and rental rates are not representative of the current situation.

***Describe the size, demographic composition of qualifying populations and unmet housing and service needs within the PJ's boundaries:***

Definitions of the four Qualified Populations (QP) is described below. Refer to HUD CPD Notice 21-10 for a more complete definition:

- Homeless
  - lacking fixed/regular and adequate nighttime residence
    - Nighttime residence is not designed for ordinary sleeping accommodations
    - Living in public/private shelter or commercial lodging
  - Will lose nighttime residence:
    - Within 14 days
    - Lacks support network needed to obtain new housing
  - Unaccompanied youth (under 25) or families with children which:
    - Defined by HUD as Runaway, DV or McKinney-Vento
    - Not had lease or ownership in permanent housing within 60 days
- At-Risk of Homelessness
  - Annual income below 30%LMI (\$15k individual)
  - Not had lease or ownership in permanent housing within 60 days
  - Has been notified in writing of eviction
- Fleeing DV, Dating Violence, Stalking or Assault
- Other Populations
  - Families requiring services or housing assistance to prevent homelessness
  - At greatest risk of homelessness
    - Annual income less than 30%AMI
    - Cost burden of 50% monthly household income
  - Veterans and families that include a veteran family member

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

The Maine Continuum of Care (MCoC) is a state-wide effort, which is beneficial in regards to coordination of efforts and resources across a wide territory as the system improves. From a local data collection effort, as addressed prior, it is also a limiting factor. The data below is from the statewide MCoC 2021 PIT. This data demonstrates a total population of sheltered individuals at 2,063.

**Summary by household type reported:**

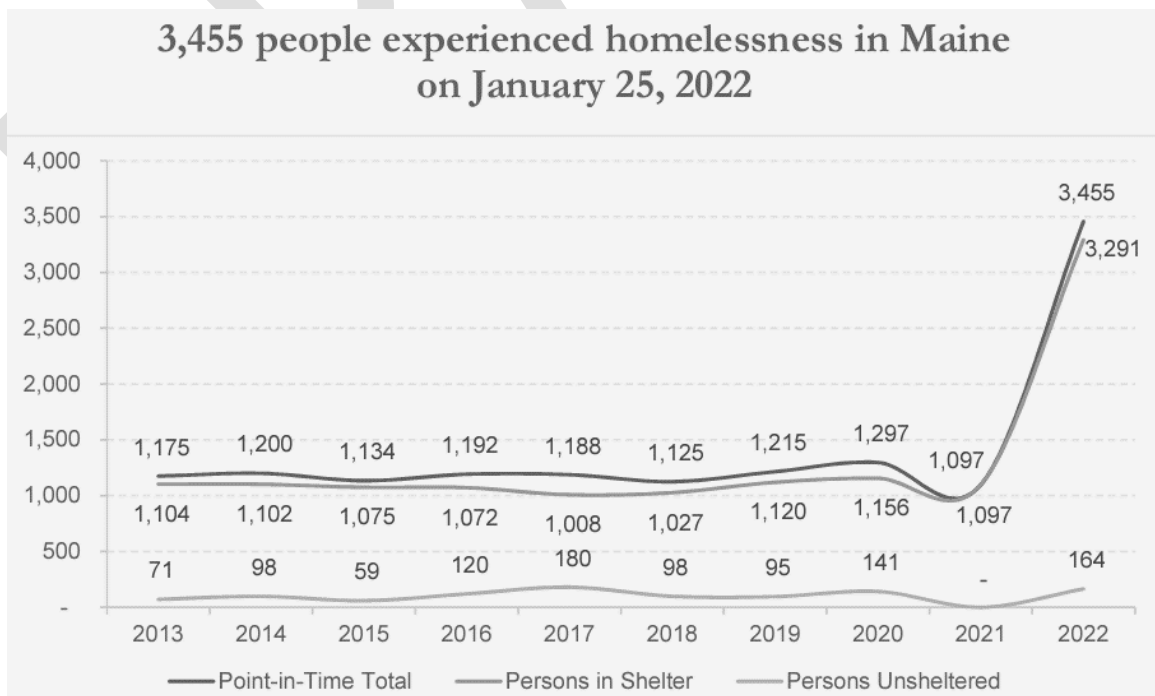
	Sheltered	
	Emergency Shelter	Transitional Housing*
Households without children <sup>1</sup>	706	529
Households with at least one adult and one child <sup>2</sup>	113	134
Households with only children <sup>3</sup>	3	2
<b>Total Homeless Households</b>	<b>822</b>	<b>665</b>

**Summary of persons in each household type:**

<b>Persons in households without children<sup>1</sup></b>	<b>717</b>	<b>556</b>
Persons Age 18 to 24	46	56
Persons Over Age 24	671	500
<b>Persons in households with at least one adult and one child<sup>2</sup></b>	<b>362</b>	<b>423</b>
Children Under Age 18	201	255
Persons Age 18 to 24	14	22
Persons Over Age 24	147	146
<b>Persons in households with only children<sup>3</sup></b>	<b>3</b>	<b>2</b>
<b>Total Homeless Persons</b>	<b>1,082</b>	<b>981</b>

Source: MSHA PIT Report

The number of people experiencing homelessness statewide, and MSHA quantified in January 2022, jumped to 3,455 in the updated 2022 PIT count. This increase was the result of including, for the first time, data derived from the local General Assistance providers as well as the Emergency Rental Assistance program. The most concerning take-away from this updated data compiled by MSHA is that as the sheltered counts increased over 300% over the past year by including new data sources, the unsheltered count only increased 15%. This demonstrates that, although new data collection and reporting is improving the accuracy of the sheltered counts, there is still an unmet need in adequately finding and quantifying the unhoused population.



Source: MSHA PIT count

Local data collected from the 2 emergency shelters operated at the Lewiston Ramada Inn and the Lewiston Armory clearly demonstrates this catch-basin effect of homeless services provided within the ALHC. The combined totals of the two emergency shelters (whose numbers are not included in MSHA PIT counts) regularly operated at capacity. Of their total 213 individuals sheltered 60% claimed Lewiston as their residence, 20% claimed Auburn with the remaining 20% coming from outside of the ALHC jurisdiction. The unmet needs as reported by managers and service providers is a lack of adequate case management as well as vacancies within transitional or supervised housing facilities that are essential to take high-need clients out of short-term shelters.

Another resource engaged during this assessment process was the Auburn & Lewiston School Departments McKinney-Vento Homeless Assistance liaisons. For Auburn, the historic totals were 69 students for school year 19-20, 70 students for school year 2021 and what is looking like 80 students for school year 2021-22. Department staff was clear data is currently hard to quantify as data was tracked in multiple systems. Still, the 265 students in the school systems who are being transported by the system under the McKinney-Vento program is notably larger than the totals of sheltered teen as reported by MSHA and the Continuum of Care. The unmet needs reported include additional funding for reliable transportation as well as supplies and expenses necessary to sustain their education while in an unstable housing situation.

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

Those at risk of homelessness within Androscoggin County are renters within 30% of the Area Median Income with at least one severe housing problem, such as overcrowding or rent burden greater than 30% of their income. The below chart provides for a total of 1, 665 renters in Androscoggin County which qualified as 30%AMI.

Owner Occupied Households			Renter Occupied Households			
HOUSEHOLD INCOME	Estimate	Margin Of Error	HOUSEHOLD INCOME	Estimate	Margin Of Error	Total
30% of Median Household Income	2,388	+/-428	30% of Median Household Income	1,665	+/-266	<b>4,052</b>
50% of Median Household Income	5,612	+/-572	50% of Median Household Income	3,804	+/-529	<b>9,416</b>
80% of Median Household Income	11,305	+/-926	80% of Median Household Income	6,849	+/-967	<b>18,155</b>
<b>Total =</b>	<b>19,305</b>		<b>Total =</b>	<b>12,318</b>		

Source: MSHA Housing Characteristics Report

Over 57% of the survey respondents indicated household income levels below 80% of the Area Median Income (AMI), meaning their household would already qualify for assistance under traditional HOME programs. Furthermore, over 24% of respondents indicated a household income under 30% AMI, meaning they would qualify as “At Risk of Homelessness” as defined in 24 CFR 91.5. Of the total respondents, 36% indicated that their household income was negatively impacted by the Covid-19 pandemic. A further 34% also indicated their families access to food and household necessities was made more difficult due to the pandemic. Regarding housing, 14% of respondents indicated that their access to adequate housing was negatively impacted this past year.

Lastly, through consultation with local housing authorities provided data on the Housing Choice Voucher centralized waitlist provided the quantification of 454 current applicants. 411 applicants currently qualify under 60% AI with 121 applicants residing in “temporary residences”, 26 being housed in a shelter or hotel and 33 reporting that they are currently “living in a place not normally used for housing.” Lastly, 57 of the current waitlist applicants are households of 3 or more.

The unmet needs relating to this QP includes additional support for subsidized housing such as the TBRA programs as well as the creation of additional new affordable units within the jurisdiction. Additional emergency expense assistance programs targeted to address short-term emergencies which usually turn into catalysts for homelessness would aid further in the prevention of homelessness within the at-risk population living under the poverty line.

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

Information provided by SafeVoices, a domestic abuse shelter service provider currently operating a 17-bed shelter, demonstrates an average 44 shelter requests per month. Safe Voices has been committed to the mission of supporting and empowering those affected by domestic violence and human trafficking and engaging the community in creating social change in Androscoggin, Oxford and Franklin counties for 45 years.

In their last fiscal year, SafeVoices alone received a total of 325 local shelter requests but were only able to house 83 individuals. This leaves an unmet need of 242 families which were under-served by the current capacity. The unmet need reported by DV focused shelter operators is additional funds and support for TBRA and subsidized housing programs to aid in the re-housing of their current population as well as a larger public awareness campaign to address the increasing instances of domestic violence they are seeing in recent years.

***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***

In looking to better assess the at-risk population the ALHC staff reached out the current Emergency Rental Assistance providers for concrete numbers related to the impending end of the current Emergency Rental Assistance program. This program, which locally administered by Community Concepts Inc, has serviced 1,118 non-duplicated households as of March 2022. With the scheduled closure of the Ramada Inn Emergency Homeless shelter and the end of the ERA program funding, preparations for a dramatic increase in housing assistance needs are being developed.

Additional data below indicates a total of over 14, 000 households within Androscoggin which have reported incomes below the poverty line. These families qualify as having characteristics of housing associated with instability and increase risk of homelessness, which includes having a household income of less than 30% AMI and/or paying more than 50% of their monthly income toward housing expenses.

	2015 Income below Poverty Level			2020 Income below Poverty Level		
	Households	Margin of Error Households in Poverty	% of Family Type in Poverty	Households	Margin of Error Households in Poverty	% of Family Type in Poverty
Total Households	7,041	+/-515	15.8%	5,410	+/-503	11.8%
Family Households	3,179	+/-351	11.4%	1,931	+/-346	7.0%
Married Couple Fam HH	905	+/-185	4.4%	569	+/-194	2.8%
M C Fam HH w/Children	508	+/-139	6.5%	358	+/-164	4.7%
Male Head of Family HH	368	+/-140	16.7%	194	+/-90	8.2%
Male Head of HH w/Children	341	+/-138	21.7%	132	+/-73	8.4%
Female Head of Family HH	1,906	+/-293	38.3%	1,168	+/-296	24.6%
Female Head of HH w/Children	1,816	+/-280	47.2%	962	+/-291	31.6%
Non-Family HH	3,862	+/-394	22.9%	3,479	+/-469	19.2%
			Total=	14,203		

Source: MSHA Housing Characteristics Report

In addition to the current homelessness crisis and the influx of more refugee families into a jurisdiction already coping with a housing shortage is the impending end of the current Emergency Rental Assistance program. This program, which locally administered by Community Concepts Inc, has serviced 1,118 non-duplicated households as of March 2022. These populations are currently being housed within hotels and apartments funded through the ERA or General Assistance programs within the jurisdiction. Simultaneously, as the ERA program is coming to a funding cliff, the GA program has announced that the hotels will no longer be pay going rates for housing refugees. As these funds shrink the unmet needs of these QPs will be new unit development with the necessary TBRA and subsidized housing to support these populations.

***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 General Assistance offices of both cities work proactively to prevent LMI families from becoming homeless. These efforts are not just based on the use of General Assistance funds but also the addition of wrap-around support services rooted in their proactive community roles. Similarly, the Auburn Public Health office continues to work with residential institutions to match needs with readily dwindling community housing and support resources. The Community Development Office is adding a new, Homelessness Intervention Specialist position with an additional McKinney-Vento style budget from the HOME-ARP allocation to provide additional services and resources to these at-risk qualified populations including TBRA.

Additionally, the Maine COC has added a new HUB Coordinator & Housing Navigator located at the Lewiston Housing Authority. This position will be the point of Coordinated Entry (CE) into the MCoC system, allowing the Community Development and Public Health teams to focus their efforts on crisis response and early intervention efforts.

A number of new shelter initiatives are being developed within both cities. With the scheduled closure of the Ramada Inn Emergency Homeless shelter and the end of the ERA program funding set to expire on June 30th, 2022, preparations for a dramatic in housing needs are being



developed. This plan allocates substantial funding and staff time to support these projects as they develop.

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

Community Concepts, who has been running the Emergency Rental Assistance program has reported a total of 1,118 non-duplicated households in the city of Auburn who have been assisted to date. As this program winds down, it is expected that these families will still be in need of some form of transitional Tennent Based Rental Assistance. More recently, MSHA has provided for government rate caps on rental assistance, which is substantially decreasing the number of hotel/motels that will accept discounted rates. The end result being an anticipated eviction wave of residents currently housed within these privately owned facilities.

Total housing inventory data, as compiled by MSHA in 2021 for Androscoggin County demonstrates only a 2.6% vacancy rate for rental units. This rate is a causal reasons for individuals to find themselves stuck within the shelter and transitional housing systems.

**Units by Tenure & Vacancy**

	2011-2015	%	Margin of Error 2011-2015	2016-2020	%	Margin of Error 2016-2020	% Change
Total Units	49,164		+/-154	50,053		+/-187	2%
Occupied Units	44,636	91% of Total	+/-483	45,906	92% of Total	+/-574	3%
Owner Occupied	28,372	64% of Occ.	+/-620	29,796	65% of Occ.	+/-724	5%
Renter Occupied	16,264	36% of Occ.	+/-596	16,110	35% of Occ.	+/-654	-1%
Vacant Units	4,528	9% of Total	+/-480	4,147	8% of Total	+/-541	-8%
Vacant For Sale	519	1.8% Vac.	+/-179	384	1.3% Vac.	+/-179	-26%
<b>Vacant For Rent</b>	<b>681</b>	<b>4% Vac.</b>	<b>+/-213</b>	<b>423</b>	<b>2.6% Vac.</b>	<b>+/-146</b>	<b>-38%</b>
Vacant Seasonal	1,110	2% of Total	+/-249	1,432	3% of Total	+/-363	29%

Data from the American Community Survey are estimates

Source: MSHA Housing Characteristics Report

Although this plan expects to provide funding for 4 new affordable rental units, the ALHC regular allocation budget workplan expects to double that number. Historically, Auburn and Lewiston have added multiple large affordable housing projects in the past few years. According to statistics maintained by Maine Housing Authority 243 new affordable housing units have been created with MSHA funding (including Auburn & Lewiston Consortium funds) between 2019 and 2022. These buildings offer modern affordable amenities to public housing residents. Auburn Housing Authority has been transitioning to a voucher-based system allowing more aid to residents using privately owned units.

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

Priority needs for qualified populations include the development of new, affordable housing units to ease the congestion within the current shelter as well as transitional housing systems. Additional direct field services and case management is also needed to aid in the transition from the high-need unhoused population into openings within the current structures and non-profit service providers across the jurisdiction.

The Auburn Community Development Department, the Auburn Housing Authority, the Lewiston-Auburn Alliance for Services to the Homeless, the Lewiston Community Development Department, the Lewiston Housing Authority, Community Concepts, Healthy Androscoggin, and other city departments, and local and regional nonprofit organizations coordinate closely in the planning and delivery of housing services. However, there are not enough resources among all of the partners to meet the identified needs. Waiting lists for services at the housing authorities are long. By leveraging private developers to construct more affordable units and engage with the Section 8 voucher program multiple agencies would be increasing efficiency and ability to better serve the 434 low-to-moderate income residents currently on the Section 8 wait list. By engaging with the new HUB Coordinator through a dedicated Housing Intervention Specialist position within the city these production efforts can be aided with wrap-around services necessary to move residents in need through a better organized structure with concrete benchmarks and measurable goals.

***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:***

Housing inventory has been a recent topic for all income brackets within Auburn and Lewiston as of late. Private development of multi-unit housing projects is on the rise across Auburn. As reported by the Auburn Planning & Permitting Department, there are a total of 102 new units in 3 different projects expected to come into service by the end of 2022. Another 423 new units are also in process to be completed by 2023, and 196 seeking approval for 2024. The large, and rapid increase in new unit development, coupled with Auburn Housing Authority's conversion to a voucher-based system will have a notable impact on addressing not just the over-all housing shortage, but will also make much needed headway in the alleviation of the shortage of affordable housing.

In order to better qualify the current state of availability it is key to point out that in the 2009 Lewiston Auburn Homelessness Strategy it was clearly stated that “the homelessness problem in Lewiston and Auburn is not, in the first place, primarily a problem of lack of housing... Instead, homelessness is a problem of insufficient income and resources, a lack of life skills, and health problems (primarily mental health and substance abuse).” This plan presented a 10-year goal of 210 new affordable units to be developed by the Auburn and Lewiston Community Development Offices. According to MSHA there were 243 new affordable units constructed within the area between 2019 and 2022 alone (not including the to-be developed Choice Neighborhood project currently underway in Lewiston).

This 2009 plan clearly identified the gaps as a service deficiency, as opposed to a long-term permanent housing problem. This initial, although dated, claim is supported by the service call data from the Auburn Fire Department who indicate 87% of their responses to homeless individuals are related to substance or mental health situations. Therefore the development of a more effective Crisis Response Team as suggested in the 2009 strategy is a key component and priority addressed by this plan.

## HOME-ARP Activities

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

The ALHC will draft a Request for Proposals (RFP) in order to choose projects and developers to receive HOME-ARP awards. The applicants must demonstrate how funding will be used to create affordable housing and provide services. Applicants will be scored according to a rubric including points for criteria such as developer experience, capacity building, services offered, housing need, project readiness, compliance to existing land use requirements, and availability of match funding. Applicants must submit application materials by a specific deadline. Applications will be scored by the ALHC management team and will award funding in order of scoring results until there are no remaining funds available. The applicants will be developers or service providers who must describe their own experience as well as that of any service providers, contractors, or consultants with whom they wish to partner. Application exhibits must demonstrate the financial feasibility of the projects, conformity to HOME-ARP requirements, commitments for services and other funding sources, site control, compliance with land use requirements, and detailed construction plans.

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

The ALHC will both provide supportive services directly as well as competitively selecting local service providers to fill identified service gaps. The City of Auburn will be creating a 3 year, field service provider position. These services are focused on responding to the needs of community members experiencing homelessness, who are at risk of homelessness or who are fleeing domestic/dating violence, sexual assault, or human trafficking. The definition of a Qualified Population (QP) to be assisted with these funds is further defined by HUD in their CDP Notice 21-10.

These services are being developed in response to quantifiable data collected by the Auburn Lewiston HOME Consortium in partnership with multiple city department, service providers and non-profits. This plan contains two key elements. The first is to provide funding for qualified services to include both **Tenant Based Rental Assistance (TBRA)**, which includes security deposits and utility deposits for qualified households, as well as **Direct Support Services (DSS)** to include McKinney-Vento Support Services and Homelessness Prevention services as further outlined in CPD Notice 21-10.

The second key element will be the creation of a Crisis Response Team (CRT) as put forward in the 2009 LAASH plan. Direct support service providers, housed in the Auburn Community Development Office, which will work proactively across city departments including the School Departments, Police Departments and General Assistance Departments to provide advocacy and support services to residents at their time of need. By engaging with the new HUB Coordinator through a dedicated Housing Intervention Specialist position within the city these production efforts can be aided with wrap-around services necessary to move residents in need through a better organized structure with concrete benchmarks and measurable referrals to the Coordinated Entry system.

The **Homeless Intervention Specialist (HIS)** will work across multiple city departments to build relationships with community members experiencing homelessness or at risk of homelessness to provide advocacy and support services and assist with connecting individuals to housing and support services. The Specialist will assist with identifying unsheltered homeless or at-risk neighbors through direct outreach with and referrals from the Auburn Police Department, Auburn Fire Department, Auburn School Department, Public Health Manager, and General Assistance Manager as needed. This may include meeting with individuals in encampments, shelters, warming locations, and other locations not meant for human habitation. The work schedule will include some evening and weekend hours where the Specialist will assess the needs of the individuals identified and facilitate placement into emergency or short-term housing as needed.

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

The ALHC did not provide administration funds to a subrecipient prior to HUD’s acceptance of the HOME-ARP allocation plan.

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$684,419	40%	
Acquisition and Development of Non-Congregate Shelters	\$410,000	24%	
Tenant Based Rental Assistance (TBRA)	\$60,000	4%	
Development of Affordable Rental Housing	\$250,000	15%	
Non-Profit Operating	\$90,000	5%	5%
Non-Profit Capacity Building	\$0	0%	5%
Administration and Planning	\$206,410	12%	15%
<b>Total HOME ARP Allocation</b>	<b>\$1,700,829</b>	<b>100%</b>	

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

In 2001, Auburn and Lewiston formed a consortium with Auburn as the lead agency to receive HOME Investment Partnerships Program funds. The consortium was formed to meet the funding threshold for HOME funds. Auburn, serving as the program sponsor, utilizes 75% of the portion of the allocations which can be set aside for administration of the HOME program to cover the overall administration of the program for the Consortium. Lewiston utilizes the remaining 25% for

their administration costs. The balance of current year allocations is then divided evenly between both cities to provide programing.

***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:***

What the MSHA PIT, the CHAS & ACS data clearly demonstrates is the need for a local option in collecting quantifiable data around housing, homelessness, and at-risk populations. This plan takes the lack of on the ground data seriously and has built in a mechanism for not just responding to the demonstrated needs which have been established through direct consultation with area service providers and locally executed community surveys, but also including a 2-year assessment component which will build the basis for developing a more permanent, sustainable and integrated response.

The last time this data was locally developed was in 2009, which was published in the Lewiston Auburn Homelessness Strategy by the Lewiston/Auburn Alliance for Services for the Homeless (LAASH). This was a local initiative used to establish a 10-year plan to end homelessness in the area. This plan was to be administered by regional partners including the cities of Auburn & Lewiston, Auburn Housing Authorities, Community Concepts, St. Mary's and New Beginnings. This initiative was to be overseen by the United Way of Androscoggin County. This plan had concrete benchmarks and established expectations for all partners and was set to be re-assessed in 2019.

The below table is derived from the May 2009 study. Although it is dated this data still demonstrates the inconsistency between local assessments and state-level data that still exists to this day:

Gaps in Service for Homeless populations in Lewiston Auburn Lewiston Auburn Homelessness Strategy – May 8, 2009		
	Numbers	At-Risk
<b>Youth</b>	204 homeless youth grades 9-12 identified by schools 423 homeless youth served by New Beginnings and Volunteers of America	<b>Youth not employed:</b> 900 ages 20-21 500 ages 22-24 <b>Youth not in school:</b> 200 ages 15-17
<b>Families</b>	2008 MSHA Point-In-Time Survey found 6 families homeless on January 30, 2008 As of September 2008, 23 families sheltered; 47 families turned away 69 homeless children grades K-8 identified by schools	<b>Families living in poverty</b> in Lewiston Auburn: 1,400 families 1,200 families with children 200 families over age 65
<b>Domestic Violence Survivors</b>	AWAP's domestic violence shelter served 170 women and children last year	434 domestic violence crimes were reported to Lewiston and Auburn police departments in 2006
<b>New Americans</b>	There are an estimated 4,000- 6,000 New Americans living in Lewiston-Auburn.	As of Jan. 2007, Lewiston identified 2,641 immigrants who had moved to the city and enrolled in General Assistance. A 2007 study by the Maine Department of Labor found unemployment among the Somali immigrants to be at 51%
<b>Single Adults</b>	546 homeless single adults sheltered by Hope Haven and St. Martin De Porres in 2007 As of Sept. 2008, Hope Haven had sheltered 252 homeless individuals and turned away 207 because it was full.	3,900 non-institutionalized individuals with a mental disability over the age of 16 700 veterans living below poverty, 2/3 of whom are disabled National rates suggest that as many as 3,000 people in Lewiston Auburn may have significant substance abuse issues

The table above indicates the MSHA PIT report demonstrated 6 homeless families in 2008, while local data verified though the Auburn School Department verified 70 homeless families. Similarly, of the 546 homeless single adults sheltered by Hope Haven & St. Martin in 2007, the MSHA PIT report for 2022 estimates those same facilities to have only 12.

Unfortunately, in 2017 LAASH members agreed to use the Statewide Homeless Council’s updated plan as the framework for advocacy as the group did not have the capacity to undertake the work and the expense of updating the plan. This abdication has left the Auburn Lewiston HOME Consortium with little to no accurate baseline data for use in the generation of this plan. In order to begin to augment the anecdotes and small data samples provided by local service providers the consortium released a Covid-19 Community housing and service survey.

Current day MSHA has made dramatic steps to improve local services for the homeless population by, as recently as March 2022, funding a new HUB Coordinator position located at Lewiston Housing Authority whose role will be to better assess the current data collection methods and

coordinate service delivery through the various and disparately funded shelters and service providers.

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

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

The ALHC anticipates 4 affordable rental units for qualified populations will be produced with HOME-ARP funds.

***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 ALHC will prioritize projects that are able to be developed quickly and that can operate with sufficient operating and supportive service dollars to meet the needs of tenants. As noted above, it is anticipated that at least 4 units of affordable rental housing units will be developed. The units developed with HOME-ARP funds will meet the ALHC's Consolidated Plan Priorities of Improving and Preserving the Quality of Housing and Expanding Affordable Housing Opportunities.

## **Preferences**

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

The ALHC will not provide preferential services for a subset of the qualified populations within the service area.

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

The ALHC will not provide preferential services for a subset of the qualified populations within the service area.

## **Referral Methods**

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

A waitlist will be established for each HOME-ARP project.

***If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):***

The ALHC does not intend to use the coordinated entry process for referrals.

***If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):***

The ALHC does not intend to use the coordinated entry process for referrals.

***If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):***

The ALHC does not intend to use the coordinated entry process for referrals.

### **Limitations in a HOME-ARP rental housing or NCS project**

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

The ALHC will not limit eligibility to a particular qualifying population.

***If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

The ALHC will not limit eligibility to a particular qualifying population.

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

The ALHC will not limit eligibility to a particular qualifying population.

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

***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***

The ALHC will not provide refinancing activities with HOME-ARP funds.

***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.***

The ALHC will not provide refinancing activities with HOME-ARP funds.

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

The ALHC will not provide refinancing activities with HOME-ARP funds.



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

The ALHC will not provide refinancing activities with HOME-ARP funds.

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

The ALHC will not provide refinancing activities with HOME-ARP funds.

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

The ALHC will not provide refinancing activities with HOME-ARP funds.

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## HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: Requirements for the Use of Funds in the HOME-American Rescue Plan Program, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

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Phillip L. Crowell  
City Manager

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