

# HOME-ARP Allocation Plan Template

## Guidance

- To receive its HOME-ARP allocation, a PJ must:
  - Engage in consultation with at least the required organizations;
  - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
  - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
  - Affirmatively Further Fair Housing;
  - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
  - Anti-Lobbying;
  - Authority of Jurisdiction;
  - Section 3; and,
  - HOME-ARP specific certification.

**Participating Jurisdiction:** Kentucky Non-Entitlement, Kentucky Housing Corporation  
**Date:** 11/1/2021

## Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and 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, at a minimum. 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.

### ***Summarize the consultation process:***

The Kentucky Housing Corporation (KHC), conducted twenty-six consultation sessions with stakeholders from each of the recommended entities.

*List the organizations consulted, and summarize the feedback received from these entities.*

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>KCEOC Community Action Partnership</b>	Community-based services organization, affordable housing developer, homeless services provider	Remote meeting	Housing units for people experiencing homelessness is priority need. Even with subsidy, struggle to find units to pass inspection. Communities with high need and low capacity may need technical assistance. Identified shelter rehabilitation needs in Whitley County.
<b>Homeless &amp; Housing Coalition of Kentucky (HHCK)</b>	Advocacy organization, supportive housing provider	Remote meeting	Development of affordable and supportive housing should be the priority. Work with mission-oriented organizations to create new units. Seek to leverage Medicaid for services. Recruit/support development in areas with low capacity.
<b>Lexington-Fayette Urban County Government</b>	PJ, local government	Remote meeting	Emphasize integrated or scattered site development. Increase intensity of supportive services. Partner with private developers.
<b>Kentucky Opioid Response Effort (KORE)</b>	State government program	Remote meeting; documents submitted	Significant gap exists for housing in a harm reduction approach. Units are needed for people stepping down from treatment that have nowhere to go. Funding through KORE can help with services, but they need help with capital/physical units. Seek to advance equity with new funding and use data to further refine strategy and approach.
<b>Kentucky Affordable Housing Coalition</b>	Affordable housing developer membership association, advocacy organization	Remote meeting	Development and operating support for housing units that serve people at Extremely Low Income is important. Services should be provided to help tenants increase income. KHC should create a flexible application and allow communities/developers to come up with proposals. Be sure to create operating support to maintain properties for the full 15 years.

<b>City of Covington</b>	PJ, local government	Remote meeting	Development, operations, and supportive services are all priority needs. Consider a leverage strategy with other PJs if the timing works out.
<b>FAHE – Kentucky Caucus</b>	Membership organization of rural affordable housing developers	Remote meeting	Development, operation, and supportive services for supportive and affordable housing are all important. Area Median Incomes are a challenge in rural areas where the AMI is very low, so what looks like ELI in an urban area is 80% in a rural area. Consider modifying consolidated plan definition for greatest need/greatest risk of homelessness to include this group as Qualifying Persons. Consider capacity building for geographic areas with high need.
<b>LifeSkills, Inc.</b>	Community Mental Health Center, supportive housing provider	Remote meeting	Development of supportive and affordable housing, including capital, operating, and services are priority needs. Tenant-based rental assistance plus supportive services are also needed. There are many people on waiting lists, and many occasions where affordable units can't pass inspections. Improving Medicaid billing for supportive services would help.

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KIC HOME-ARP Consultation Supplemental Table

Table for Allocation Plan Consultation Summary

Agency/ORE Consulted	Type of Agency/ORE	Method of Consultation	Summary of Feedback
Kentucky Department for Behavioral Health, Intellectual and Developmental Disabilities	State agency	Remote meeting	All rental housing activities are important – capital, operating, and supportive services. Supportive services that are person-centered and can follow people into recovery housing, if they choose, are needed. Housing should also be available for people who relapse, including a harm reduction approach. More housing is also needed that can support people utilizing Medication-Assisted Treatment. Some areas need more and rental assistance. Supportive services are needed in all cases.
KY Balance of State Continuum of Care	Continuum of Care local agency	Remote meeting	The creation of supportive housing should be the top priority. CoC funding may be able to provide some operating and/or services dollars, but will take time to secure new grants. CoC recommends prioritizing areas of the Commonwealth with low capacity and to consider communities that could be large enough to create high fidelity supportive housing in a single the commitment to this is a significant need and opportunity.
Louisville-Jefferson County Metro Government	PJ, local government	Remote meeting	Leveraging KIC's allocation with local funds to create supportive and affordable housing would be welcomed. Louisville Metro is moving forward quickly with an RFP to create new units for supportive, affordable, and shelter using their State and Local Fiscal Recovery Funds. The 200% investment was prioritized by local government to address unmet and chronic homelessness in the city.
Cabinet for Health and Family Services; Office of the Secretary and Department for Medicaid Services	State agency	Remote meetings, ongoing	Housing is an important social determinant of health. We operate in close to other Medicaid-funded services are not typically utilized by homeless service providers and healthcare providers don't know how to help people access housing. Barriers to billing should be addressed, if possible. Housing resources should be included in local health equity efforts.
Lexington-Fair Housing Council	Fair Housing Initiative Program grantee providing services statewide	Remote meeting	Supportive services as well as affordable housing are much needed in common. Services should be provided in collaboration with the people receiving them and delivered by people that are diverse reflective of the population served. Housing should be accessible to people with bad credit and eviction histories, as these households are at greatest risk of homelessness. Prioritizing affordable units in gentrifying areas.

## Public Participation

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.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

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

***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:***

- ***Public comment period:*** start date – 11/4/2021 end date – 11/19/2021
- ***Public hearing:*** 11/4/2021

Thirty-five individuals representing 16 organizations throughout Kentucky participated in the public hearing on November 4<sup>th</sup>. Two written comments were also received during the public comment period.

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

Outreach to key stakeholders was conducted from mid-September to mid-November. KHC held 26 consultation sessions with stakeholders identified as having important viewpoints and experiences, including two focus groups with people who experienced homelessness themselves. In each of the consultation sessions, participants were asked to describe what people experiencing or at greatest risk of homelessness say they need, in addition to what professionals understand to be the primary needs and opportunities in Kentucky. In each meeting, participants were encouraged to provide follow-up information or ideas as they arise, and to identify any additional stakeholders that would help enhance the process.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

***Summarize the comments and recommendations received through the public participation process:***

Several stakeholders asked questions or emphasized in their comments the need for rural and smaller developments as an eligible project-type, without restrictions on match or leverage of other sources. A stakeholder representing rural development professionals also emphasized the

need for case management services. Lastly, a developer asked about potential match or funding allocations to the Louisville or Lexington areas.

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

There were no specific recommendations in the public participation process that were not accepted. While some participants in consultation sessions did recommend rental assistance, we received no specific requests or changes to the allocation plan to include tenant-based rental assistance. There seems to be uniform recognition of the priority need for creation of new supportive and affordable units in the Balance of State. Balance of state affordable and supportive rental housing projects, including smaller developments that are not leveraging 4% bonds or 9% Low Income Housing Tax Credits will be prioritized, although KHC has not ruled out partnering in projects in other entitlements. Case management services will be funded through the supportive services allocation proposed in the allocation plan.

## **Needs Assessment and Gaps Analysis**

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. 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. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

### OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	897	258	1726	1726	30								
Transitional Housing	205	66	452	452	297								
Permanent Supportive Housing	1368	423	1819	1819	925								
Other Permanent Housing						137	108	0	0				
Sheltered Homeless						2,271	14,146	359	2682				
Unsheltered Homeless						60	1,206	40	#				
<b>Current Gap</b>										288	96	3240	3240

**Suggested Data Sources:** 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

### OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	568,587		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	89,409		
Rental Units Affordable to HH at 50% AMI (Other Populations)	51,455		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		94,885	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		28,845	
<b>Current Gaps</b>			123,730

**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:***

Of the 4,011 people counted as meeting HUD's definition of homeless during the 2020 Point In Time count, the following demographics were identified:

- 60% Male, 40% Female, less than 1% transgender and gender non-conforming
- 70% White, 25% Black/African American, 3% Hispanic/Latino, less than 1% Asian and American Indian, Hawaiian or Pacific Islander, and Multiple Races.
- 14% were under 18, 7% age 18-24
- 23% were unsheltered; and
- 16% were chronically homeless

It is important to note that Kentuckians who identify as Black are more than three times as likely to experience homelessness than their white counterparts.

Annualizing the Point In Time count results in an estimated 20,972 Kentuckians who experienced homelessness in 2020. While the Balance of State is home to the most individuals counted as sheltered or unsheltered during the annual count, on an annualized basis, the three Kentucky CoCs have a similar number of people who experience homelessness each year, when factoring in shelter utilization patterns.

Other qualifying populations include a subset of the 95,000 households with at least one severe housing burden who are at 0-30% of the Area Median Income. No data is available at this time on the number of households who are both extremely low income and experience any one of the seven additional risk factors identified in the HOME-ARP Implementation Notice.

***Describe the unmet housing and service needs of qualifying populations, including but not limited to:***

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness; and,***
- ***Those at greatest risk of housing instability or in unstable housing situations:***

Looking specifically at those who experience sheltered and unsheltered homelessness, it is estimated that 3,422 individuals and 233 families require a supportive housing intervention to exit homelessness. We estimate the existing Supportive Housing programs house 319 households per year, leaving a gap of 3,366 units. This includes both those who are chronically homeless, and a percentage of individuals with disabling conditions who have not yet been documented as chronically homeless in the Homeless Management Information System (HMIS.)

There are 11,358 households who experience homelessness who lack access to safe and affordable housing, but whose needs do not rise to the level of the more intensive supportive housing intervention.

Among those who are at risk of homelessness, the Corporation for Supportive Housing estimates another 16,832 households need supportive housing in Kentucky each year. This includes individuals who are incarcerated and have behavioral health needs, individuals in nursing homes, developmental centers, psychiatric hospitals and residential treatment facilities, as well as families and youth involved in the child welfare system due to lack of safe and affordable housing. There is an unknown additional number of households in the 95,000 ELI renters who are facing eviction, behind on rent, and not otherwise counted in this data. (Source: KHC's 2020 Consolidated Plan, Housing Needs Assessment.)

The National Low-Income Housing's most recent state housing needs report notes that there is a shortage of 77,701 housing units available to people at extremely low income. (Retrieved from: [Kentucky | National Low Income Housing Coalition \(nlihc.org\)](https://www.nlihc.org/))

In summary, the gap for people who are literally homeless is estimated to be:

- 3,377 Supportive Housing Units, and
- 11,358 affordable units

For people who are precariously housed, or in institutional settings, the gap is estimated to be:

- 16,832 Supportive Housing units, and
- 56,926 affordable units (ELI unit gap less supportive housing estimate)

***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:***

Kentucky has 3,322 emergency shelter, transitional housing, and safe haven beds. This includes 1,984 year-round emergency shelter beds. Not including COVID-related increased rental assistance programs, 627 households were in rapid rehousing programs, the majority of whom were families with children or veterans (257 families, 177 veterans,) despite their smaller representation among Kentucky's homeless population. Utilizing data from KHC's 2021 Housing Needs Assessment, there are 4,714 vouchers making rents affordable, with 516 project-based and 3,829 tenant-based. There are 2,242 units of Supportive Housing as of the 2020 HIC.

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

There are numerous counties in the Balance of State that do not have shelter facilities for those who experience homelessness. The unsheltered homeless rate of 23% signifies the gap in safe and welcoming emergency shelter beds across the commonwealth. KHC is also aware that many of the current shelters operating do not have separate (non-congregate) sleeping quarters for individuals and families to feel safe and secure during a housing crisis. Furthermore, few emergency shelter programs can accommodate all household compositions, pets, gender identities, and/or operate in a low-barrier, harm reduction manner. This was noted in conversations with local CoC staff, domestic violence service providers, and was identified in a recent study by the University of Louisville as a common reason why people elect to sleep



unsheltered. There is much work to be done to add capacity and enhance the programmatic and physical aspects of current emergency shelters across Kentucky.

The gap in supportive and affordable housing has been previously described and has been emphasized in each of the 27 consultation sessions that KHC conducted to date.

Additionally, a common if not universal concern raised by stakeholders and people experiencing homelessness was the challenge in providing or accessing supportive services to promote health, recovery/wellbeing, and income stability. This is a challenge in both urban and rural parts of Kentucky. The inability of most homeless organizations to bill Medicaid for eligible supportive services was noted. According to data in the Homeless Management Information System (HMIS), the majority of households who experience homelessness are enrolled in Medicaid (ranging from 55% of those engaged in street outreach programs to 81% of those entering permanent supportive housing.) Also noted was the lack of trained staff available to serve all parts of the state who could assist people experiencing homelessness with employment and case managements supports (including child care, transportation, and legal services) regardless of their diagnosis.

Finally, street outreach that has been funded through the Emergency Solutions Grant-Coronavirus (ESG-CV) source expires in September of 2022. This will create a critical gap in identifying and connecting people who experience homelessness with rental assistance funds that will remain available through 2025.

***Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:***

HUD’s Comprehensive Housing Affordability Strategy (CHAS) data (<https://www.huduser.gov/portal/datasets/cp.html>) reports that 134,700 Kentucky renter households have at least 1 of 4 severe housing problems. These households lack safe, economically sustainable housing and are at increased risk of housing instability and homelessness. Therefore, households that spend more than 30% of their income and live in substandard housing are considered to be unstably housed and at risk of homelessness. Substandard housing is defined at 24 CFR § 5.425, which reads:

(a) *When unit is substandard.* (See § 5.415(a)(2) and (c)(2)(ii) for applicability of this section to the Section 8 Certificate/Voucher, Project-Based Certificate, Moderate Rehabilitation programs and the public housing program.) A unit is substandard if it:

- (1) Is dilapidated;
- (2) Does not have operable indoor plumbing;
- (3) Does not have a usable flush toilet inside the unit for the exclusive use of a family;

(4) Does not have a usable bathtub or shower inside the unit for the exclusive use of a family;

(5) Does not have electricity, or has inadequate or unsafe electrical service;(6) Does not have a safe or adequate source of heat;

(7) Should, but does not, have a kitchen; or

(8) Has been declared unfit for habitation by an agency or unit of government.

(b) *Other definitions—*

(1) *Dilapidated unit.* A housing unit is dilapidated if:

(i) The unit does not provide safe and adequate shelter, and in its present condition endangers the health, safety, or well-being of a family; or

(ii) The unit has one or more critical defects, or a combination of intermediate defects in sufficient number or extent to require considerable repair or rebuilding. The defects may involve original construction, or they may result from continued neglect or lack of repair or from serious damage to the structure.

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

The priority needs among the qualifying populations are affordable and supportive housing, as well as shelter in some parts of the Balance of State. Additionally, there is a priority need to extend street outreach from October 2022 through the expiration of rental assistance funds in 2026.

***Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:***

KHC consulted with the Corporation for Supportive Housing, who utilized the State Investment Response Estimator Tool (S-IRET) to annualize and project housing intervention gaps for people who experience homelessness in Kentucky. This was amended to reflect annualized data available through the Balance of State HMIS and local CoC data. Additionally, KHC heard from stakeholders during the consultation process about the priority gaps and needs throughout the state, including other entitlement areas.

## **HOME-ARP Activities**

***Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:***

KHC will pursue changes in the 9% Tax Credit, 4% Tax Credit/Tax-Exempt Bond, and Non-Credit funding rounds in each of the next three years (or until all funds are awarded) to align and

leverage HOME-ARP Rental Housing funds to create supportive and affordable housing to serve HOME-ARP qualifying populations. These are existing competitive processes that can be utilized to award the bulk of KHC's HOME-ARP allocation and require developers to identify the property management and supportive services providers to ensure experience and capacity criteria are met. Supportive services funding, including street outreach will be included in a separate RFP process. Similarly, an RFP process will be initiated for the Non-Congregate Shelter Acquisition and Development component – anticipated in summer or Fall of 2022. KHC will not administer activities directly.

***If any portion of the PJ's HOME-ARP administrative funds were 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:***

Not applicable. KHC contracted with the Corporation for Supportive Housing to assist in the Consultation and Allocation Plan development, but did not delegate the PJ's entire HOME-ARP grant to any party.

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. The following table may be used to meet this requirement.

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

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 7,500,000		
Acquisition and Development of Non-Congregate Shelters	\$ 2,000,000		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 36,552,539		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 500,000	0 %	5%
Administration and Planning	\$ 5,172,504	10 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 51,725,043</b>		

#### ***Additional narrative, if applicable:***

KHC will allocate the bulk, 71%, of its allocation to the development of affordable and supportive housing. An additional 14% will be allocated to supportive services that will: be paired with the newly created units; provide street outreach; or be provided to other supportive housing activities that have rental subsidy, but do not have sufficient supportive services to deliver quality care to qualifying households. A smaller portion will be made available to communities in the Balance of State Continuum of Care that have sufficient operations funding to support Non-Congregate Shelter, but need capital improvements. If these funds are not fully

appropriated by 12/31/2022, any remaining funds will be reallocated to the Rental Housing activity. Finally, KHC is reserving \$500,000 to build capacity for non-profit community organizations to develop supportive and affordable housing, including funding pre-development activities, and/or training and personnel costs for an entity that will build and serve the affordable and supportive housing units funded with HOME-ARP for qualifying households.

***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:***

KHC reviewed the gap analysis for shelter, affordable and supportive housing, the investments being prioritized by other entitlements, as well as feedback and experience from those working to end homelessness in the Balance of State and those who experience homelessness. There are significant needs in nearly every county in Kentucky for each of the HOME-ARP eligible activities, and the lack of high-quality supportive housing in particular was emphasized by all stakeholders. High-quality supportive housing can help reduce long-term shelter stays, unsheltered homelessness, and provide a safe and affordable place to recover from substance abuse, mental illness and other disabling conditions. KHC is aware that existing supportive housing programs are not adequately funded in operations or services to meet the needs of the population they were created to serve. It is KHC's intention to structure a competition that both leverages all relevant funding sources (housing vouchers, Medicaid, other HUD and behavioral health funding), and also provides capital, operating, and supportive services funding in fidelity to evidence-based practices.

KHC is working with the Cabinet for Health and Family Services and Department of Medicaid Services with urgency to address barriers to reimbursement that will be critically important to the future success of these capacity building efforts. Furthermore, KHC has hired CSH to provide capacity building training and ongoing technical assistance to non-profit organizations and development teams to ensure the newly-created supportive housing units will operate according to the evidence-based practices. We expect these efforts over the next two to three years will result in long-term improvements in the field in Kentucky.

Additionally, KHC heard from three organizations that identified the need for capital improvements or acquisition/development of Non-Congregate Shelters. In at least one case, this is an urgent need without clear pathways to secure all the capital funding needed. The organizations will be required to cover the operating expenses for the full 10-15 years.

## **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:***

KHC estimates 300 new supportive and affordable housing units will be created from the recommended allocation to serve the qualifying population. Supportive services would provide a

bridge as service providers enroll in the state's Medicaid and Managed Care provider network, and to cover services that are not eligible for Medicaid reimbursement. If the full allocation is utilized on supportive services, it is estimated that the allocation would support 600 households, including many residing in newly created supportive housing.

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

As noted, KHC estimates it can support the creation of 300 new units, by filling capital gaps and leveraging the state's tax credit and bond programs (9% and 4%), state and national affordable housing trust funds, and HOME formula allocation funds. Some projects will be solely financed with HOME-ARP rental housing funds, however, all efforts will be made to leverage other financing tools to maximize unit production. This will meet only ten percent of the annual homeless supportive housing need, but would represent a 13% increase in units available that will serve the target population for at least 15 years.

KHC will seek to prioritize high quality supportive housing developments that can operate with fidelity to evidence-based practices and are adequately capitalized with sufficient operating and supportive services dollars to meet the needs of the tenants.

## **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:***

- 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).
- PJs are not required to describe specific projects to which the preferences will apply.

KHC will not apply preferences among subpopulations within the qualifying populations for any of the eligible housing units.

***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 category of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

The Balance of State Coordinated Entry system will be utilized to prioritize and refer households to rental housing activities funded by KHC's HOME-ARP allocation.

***If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:***

Enter narrative response here.

## **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***

KHC will establish a minimum of \$50,000/unit for rehabilitation or refinancing to ensure new or renovated units will be appropriately capitalized to sustain 15 years of occupancy by an extremely low-income population.

- ***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.***

KHC will conduct compliance activities to ensure properties renovated or developed with HOME-ARP remain in use, and for the intended HOME-ARP eligible purposes for the full compliance period. KHC will also conduct underwriting and subsidy layering reviews to take ensure financial and project feasibility.

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

KHC expects the majority of funds will be used to create additional affordable units, but will also allow preservation of existing affordable units, should projects receiving HOME-ARP capital funds include existing project-based or other subsidies tied to the units being renovated.

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

KHC will require a 15-year compliance period for all HOME-ARP awards. If HOME-ARP funds are braided with other funding sources with longer compliance periods, KHC will not extend HOME-ARP compliance period to match the compliance period(s) of the other funding source(s).

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

KHC understands and will ensure that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

# KHC HOME-ARP Consultation Supplemental Table

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Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Summary of Feedback
Kentucky Department for Behavioral Health, Intellectual and Developmental Disabilities	State agency	Remote meeting	All rental housing activities are important – capital, operating, and supportive services. Supportive services that are person-centered and can follow people into recovery housing, if they choose, are needed. Housing should also be available for people who relapse, including a harm reduction approach. More housing is also needed that can support people utilizing Medication-Assisted Treatment. Some areas need units and rental assistance. Supportive services are needed in all cases.
KY Balance of State Continuum of Care	Continuum of Care lead agency	Remote meeting	The creation of supportive housing should be the top priority. CoC funding may be able to provide some operating and/or services dollars, but will take time to secure new grants. CoC recommends prioritizing areas of the Commonwealth with low capacity and to consider communities that could be large enough to create high fidelity supportive housing in a single site environment as this is a significant need and opportunity.
Louisville-Jefferson County Metro Government	PJ, local government	Remote meeting	Leveraging KHC's allocation with local funds to create supportive and affordable housing would be welcomed. Louisville Metro is moving forward quickly with an RFP to create new units for supportive, affordable, and shelter using their State and Local Fiscal Recovery funds. This \$200M investment was prioritized by local government to address unsheltered and chronic homelessness in the city.
Cabinet for Health and Family Services: Office of the Secretary and Department for Medicaid Services	State agency	Remote meetings; ongoing	Housing is an important social determinant of health. We operate in silos too often. Medicaid-funded services are not typically utilized by homeless service providers and healthcare providers don't know how to help people access housing. Barriers to billing should be addressed, if possible. Housing resources should be included in KYnect electronic referral database.
Lexington Fair Housing Council	Fair Housing Initiatives Program grantee providing services statewide	Remote meeting	Supportive services as well as affordable housing are much needed investments. Services should be provided in collaboration with the people receiving them and delivered by people that are diverse/reflective of the population served. Housing should be accessible to people with bad credit and eviction histories, as these households are at greatest risk of homelessness. Preserving affordable units in gentrifying areas

KHC HOME-ARP Consultation Supplemental Table

			would also be important. Ensure that the housing that is created is focused on areas with the most need/deepest poverty and that it serves those people who most need it.
City of Owensboro	PJ, local government	Remote meeting	City of Owensboro has needs for non-congregate shelter, affordable, and supportive housing. They are early in the process for their own allocation, but are hoping to leverage as many sources as possible, including vouchers and supportive services from the Veterans Administration, or other community health provides.
Center for Independent Living Options (CILO)	Disability service provider	Remote meeting	Affordable and accessible housing, including utilities are significant needs in Kentucky. Many people also need help with supportive services including legal aid and employment. New funding should be simplified, or streamlined as much as possible. The more KHC can reduce the process, the better results they will get.
Welcome House, Inc.	Homeless service provider	Remote meeting	Preventing people from becoming homeless is important and not available in much of Kentucky. Current Supportive Housing programs do not cover their costs. A Tenant Based Rental Assistance plus supportive services would be a good strategy. If new units are created, they must be able to operate for people with very low incomes and provide an appropriate level of services. Geographic and capacity considerations are important.
KHC Balance of State Public Housing Authority	Public housing authority	Remote meeting	Unit creation – affordable and supportive – are critical needs across the Balance of State. There are 6,000 people on the wait list for affordable housing. Wait times for locating a unit, and extensions for lease up have become more common. Balance of State could consider project-basing some vouchers to support operating needs of new projects and to make the HOME-ARP funds go farther. Suggest a geographic strategy based on longest times to lease up units.
Volunteers of America Mid-States	Homeless service provider, veterans' services provider	Remote meeting	Affordable housing, including utilities is a priority need. This includes both rental assistance and unit creation strategies. Supportive services are also critically important and should be part of any new unit strategy. Finding staff is a challenge in parts of Kentucky. In some cases, larger units are needed. Families served by VOA would say



KHC HOME-ARP Consultation Supplemental Table

			their biggest need is for safe and affordable housing.
Kentucky Coalition Against Domestic Violence (KCADV)	Domestic violence coalition of providers	Remote meetings	KCADV recommends investments in non-congregate shelters as well as affordable and supportive housing. A range of housing options, including transitional, prevention, and affordable rental units are needed. This could include campus-type approaches, and shipping container/tiny home units. Supportive services, including workforce, childcare, transportation, etc. are also necessary to support people fleeing domestic violence. Many units can't pass HQS, so adding units is a significant need.
Louisville Coalition for the Homeless	CoC Collaborative Applicant, Homeless advocacy organization	Remote meeting and document submission	Louisville has a significant need for units that are safe and affordable. Shelter renovations to create non-congregate shelter accommodations are also important so that people feel safe accessing shelter. Studies have been conducted recently on people who are unsheltered and the perception of safety and privacy were identified as key factors. While leverage is a good option, KHC may have other areas of the state that have great needs and fewer resources.
Partnership Housing Inc.	Affordable housing developer and property manager	Remote meeting	New units are badly needed in Owsley and surrounding counties. Partnership has land to develop to create new units – as many as ten units. Supportive services are also important and can be challenging. It is difficult to have supportive services delivered in rural areas. Partnership can help with care and benefits coordination.
Community Action Council for Lexington-Fayette, Bourbon, Harrison, and Nicholas Counties	Community-based services organization, supportive housing provider	Remote meeting	New units are always needed throughout the state. Capacity building, especially connecting behavioral health services providers to serve the tenants is also much needed. Recommend using short-term money for long-term gains, including creating new units and building supportive services capacity. Areas with the highest need, including unsheltered homelessness should be prioritized. It may make sense to focus new units and services in one area to serve surrounding counties.
Kentucky League of Cities (KLC)	Membership organization of local elected officials	Remote meeting	KLC members are recently engaged in the effort to respond to rising homelessness across the state. They are in the education and information dissemination stage at this point. There is recognition of the need for affordable and supportive housing, as well as shelter and services. KLC would be happy to partner with

KHC HOME-ARP Consultation Supplemental Table

			KHC on ways to leverage local funding and political will to expand capacity.
People Experiencing Homelessness	Lived experts	Remote meetings; in-person focus group.	Creation of new units and provision of supportive services are the top priorities cited. Rapid Rehousing is helpful but needs last longer than the term of assistance and it is increasingly difficult to find landlords and quality units. More on-site services would be appreciated, especially childcare and healthcare.
Housing Development Alliance	Affordable housing developer and property manager	Remote meeting	Operating subsidies along with capital funding are very important. For those in rural counties living in mobile homes that are dilapidated, these households have few or no options. They don't qualify as homeless and their incomes may be too high for ELI given the area income is so low in the county. While it is hard to find land in some counties, it would be possible to build 4-plex and duplex units. This could be accomplished relatively quickly, given plans that have been created to date.
Wabuck Development	Affordable housing developer	Written comment	Supportive services to help individuals increase employment and income are critically important. Housing for people in long-term recovery is also important. Developing new units that can operate on rents for those at extremely low income is important, but must be paired with supportive services to be most effective.
Department for Veterans Affairs	State Agency	Remote meeting	TBRA would help homeless and those at risk of homelessness, but there is also great shortage of affordable rental units, especially in rural areas. Need more homeless shelter options in Western Kentucky, including Bowling Green.

**Erica A. Yan**

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**From:** Kentucky Housing Corporation <khcegrams@kyhousing.org>  
**Sent:** Monday, October 18, 2021 9:00 AM  
**To:** Erica A. Yan  
**Subject:** Notices of Public Hearing and Comment Period for November 4 - 19, 2021

**EXTERNAL EMAIL: Do not click links or open attachments unless you recognize the sender and know the content is safe.**

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## **Notice of Public Hearing and Notice of Public Comment Period**

### **A public hearing and a public comment period will be held to obtain needs information for the 2021 Annual Action Plan American Rescue Plan Substantial Amendment.**

The Annual Action Plan is the Commonwealth's application and distribution plan for U.S. Department of Housing and Urban Development (HUD), Office of Community Planning and Development (CPD) Block Grant Programs (HOME, ESG, CDBG, HTF, and HOPWA). Kentucky received an additional funding allocation through the American Rescue Plan Act (ARPA) to be administered through the HOME Investment Partnerships Program (HOME) to perform activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. These funds are governed by HUD CPD Notice 21-10: Requirements for the Use of Funds in the HOME-American Rescue Plan Program issued September 13, 2021.

A public hearing will be held for the purpose of obtaining public input on Thursday, November 4, 2021, at 11AM EST. A draft of the amended Plan will be available for public comment Friday, November 5, 2021, through Friday, November 19, 2021. Oral and written comments will be accepted and, where applicable, will be incorporated into the document.

The public hearing on November 4, 2021, may be accessed via Zoom at the following links and phone numbers:

#### **Join Zoom Meeting**

<https://us02web.zoom.us/j/81893663710>

## **2021 Amended Annual Action Plan Public Hearing**

### **HOME-ARP Substantial Amendment**

**November 4, 2021, 11AM**

#### **Virtual Public Hearing**

A recording of this virtual public hearing can be found at  
<https://www.youtube.com/watch?v=G0eiK7MIVIU>.

Attendees: Anthony Elmore - Wabuck Development; Vonda Poynter - Fahe Inc.; Bobbie Ramsey - House of Ruth Board Member; Aaron Butler - House of Ruth Board Member; Douglas Beard - Northern Kentucky Community Action Commission; Lisa Sutton - House of Ruth; Tiffany Marthaler - Kentucky Affordable Housing Coalition; Sara Ford - Wallick Communities; Annie Ross - Ohio Capital Corporation for Housing; Adrienne Bush - Homeless and Housing Coalition of KY; Cassie Carter - Homeless and Housing Coalition of Kentucky; Andrea Moneypenny - The Model Group; Brennon Davis - Wallick Communities; Anne Chaney - Impetus Consulting; Don Reinhardt - Mattingly Edge Housing Solutions Project; Josh Hooper - Beacon Property Management

Corporation for Supportive Housing (CSH) staff present: Katie Kitchin, Leah Werner

Department for Local Government (DLG) staff present: Jennifer Peters

Kentucky Housing Corporation (KHC) staff present: Erica Yan, Jon Davidson, Curtis Stauffer, Winston Miller, Jeremy Ratliff (administering the Zoom), Jonathan Coulter, Tracy Thurston, Rebecca Shobe, Mary Beth Smith, Kendrick Vonderschmitt, Wendy Smith, Kenzie Strubank, Angel Ballew, Jasmin Thurman, Gloria Wright, Molly Tate, Samuel Thorner, Jaime Rice

Erica Yan reviewed guidelines for the virtual hearing.

Rebecca introduced herself and welcomed everyone to the public hearing. She reviewed the purpose of the hearing. It is for the HOME-ARP allocation KHC received. The amended 2021 draft is available on KHC's website. It will remain available for public comment until November 19<sup>th</sup>. Please send comments to [corpplanreport@kyhousing.org](mailto:corpplanreport@kyhousing.org).

Curtis introduced himself. Curtis summarized the history of the new allocation and its purpose. He also introduced consultants from the Corporation for Supportive Housing and how they helped KHC draft the substantial amendment. CSH and KHC reached out to key stakeholders, individuals, and other organizations to gather recommendations on how best to utilize the new HOME-ARP dollars. KHC hopes to use these funds as well as other existing funds to address homelessness and other programs. Curtis introduced Katie Kitchin from CSH.

Katie thanked everyone for joining the hearing. Katie explained that they hosted sessions to gather input from stakeholders from around the state. She summarized the most prominent suggestions, such as the creation of affordable and supportive housing, tenant-based rental assistance, and the creation of non-congregate shelters, among other recommendations. Katie also prepared and shared a presentation that summarized the feedback from the consultation sessions. Katie shared some obstacles that

organizations face when helping the community. Katie summarized the draft amendment and shared information from the allocation plan that was posted on KHC's website. The plan identifies gaps in assistance, outlines the need for projects, and breaks down how the funding will be utilized and what types of activities KHC intends to conduct. Katie summarized the outcomes that KHC hopes to achieve and the populations who KHC hopes to assist. She also shared how the funds will be distributed and awarded.

The floor was opened for questions and comments.

Vonda noted that KHC will also leverage housing tax credits and there may be a smaller development for a direct HOME-ARP piece. She asked if KHC has an idea of what the dollars carved out of the \$36.5 million might look like.

Wendy responded that KHC is trying to maintain flexibility in its approach to see what demand arises from the first round of funding. CSH will provide technical assistance with interested developers and that may help make some of those allocation decisions. They made some initial projections that examine what potential matching funds could look like for 4% and LIHTC deals. Once we are further down the line, we will have a better idea of the activity. Wendy said she can almost certainly guarantee some standalone non-credit rounds that will target these HOME-ARP funds potentially in conjunction with AHTF and the HOME formula allocation, but that is going to be worked out in consultation with our partners and Multifamily division as we work to decide the best way to allocate those funds competitively to the partners that are willing to create these permanent supportive housing units.

Vonda explained that in rural areas, a lot of time LIHTC deals do not come out well and that is a concern for some of the FAHE members.

Wendy explained that during the consultant with FAHE members, a couple of the developer partners expressed interest in looking at smaller scale developments and or scattered site models that would not be appropriate for a much larger scale a lifetime deal, so we are aware of that demand and we will likely be providing funds to meet that demand to some degree.

Tiffany noted the new construction portion of funding is going to be paired up possibly with the 9 and 4% credit rounds. With priorities of Balance of State, Tiffany wondered if KHC talked about going into the Louisville and Lexington area as well.

Curtis explained those jurisdictions are not going to be excluded outright but noted that these jurisdictions have their own HOME allocations. We will be prioritizing allocations in the BoS where no other funding is available. He does not know what types of proposals we may see, but considering Louisville plans to commit over \$100 million affordable housing and homeless services using ARP Local Fiscal Recovery funds, there may be little to no need in Louisville for additional matching funds or partnerships with KHC.

Tiffany asked if KHC talked to Metro [Louisville] about coordinating funding cycles.

Curtis said that he defers to Sam Thorner, Director of Multifamily, but generally, KHC has strong communication with other jurisdictions in the state.

Wendy explained that in a conversation with Metro, they did discuss the possibility. KHC's Multifamily department has talked about partnering on bond NOFAs not related to these HOME dollars, but it is a possibility.

Tiffany noted that KHC wants to have this plan approved by the end of the year and although KHC cannot give any more specifics, she wonders when application cycles may open. She asked how quickly after the plan is approved by HUD will KHC open applications.

Curtis explained that if we receive approval in a timely fashion, we may have it follow the traditional Multifamily allocation model. Any independent RFPs for supportive services and/or a noncredit round will be developed in 2022. Curtis cannot speak specifically to the timeline for smaller, non-competitive, non-credit proposals for development. He anticipates we may start seeing requests for supportive services sometime in mid-2022. Those timelines depend on what we hear from potential applications for Multifamily development funds.

Adrienne asked if KHC could talk more about the coordinated entry process and eligibility for participating. She explained she is thinking about implementation and what that will look like.

Curtis explained that details to expand to the elder population will need to be developed once the units become available. We plan to use the existing BoS coordinated entry referral process for folks experiencing homelessness to access permanent supportive housing. Policies will be modified to accommodate the additional eligible populations for HOME-ARP funds.

Adrienne asked if folks exiting Recovery Kentucky centers would qualify and if they would be prioritized.

Curtis said it will be based on the assessment of the individual experiencing, or is at-risk of, homelessness. They will try to serve the highest need folks, but there will not be any particular populations that are eligible that will be prioritized aside from those who are most at risk.

Wendy further explained that one of our aims is to not create such specialized housing that it's not generally available for people experiencing or significantly at risk of homelessness. We want to use coordinated entry to get people into these units but not create such specific population targets that units do not get filled by people who need them.

Curtis said that Adrienne is aware that KHC heard from partners in the consultation period that there is a great shortage of units that are available to the general homeless population, which largely consists of single individuals experiencing homelessness.

Rebecca thanked everyone for joining the hearing today and reminded everyone that the draft plan is on KHC's website. It will be available for comment through November 19<sup>th</sup>. Please email KHC if you think of anything. Rebecca concluded the hearing.



## Kentucky State Caucus

November 19, 2021

Ms. Erica Abrams Yan  
Corporation Planning and Accountability Department  
Kentucky Housing Corporation  
1231 Louisville Road  
Frankfort, KY 40601

RE: KY Amendment for Annual Action Plan for HOME ARP Allocation  
Email to [CorpPlanReport@kyhousing.org](mailto:CorpPlanReport@kyhousing.org)

We would like to thank Kentucky Housing Corporation for providing the opportunity to submit public input on the HOME American Rescue Plan Act as KHC is charged with activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations.

We would like to share several comments on behalf of Fahe's 15 nonprofit Members based in Appalachian counties for consideration related to the goals and vision for addressing the Commonwealth's housing needs. KY Members are dealing with issues such as continued high material costs and delivery delays that increase the overall development costs of housing across the Commonwealth; we are hopeful that the investment of federal funding recognizes the various market issues being balanced by affordable housing providers.

In addition to maintaining affordable resources with HOME and other federal sources, the HOME ARPA funding has targeted qualifications for households. There is no language in the HOME ARPA Plan regarding targeted delivery to rural very low income and this will be a geography that will be difficult to develop and operate as well as providing quality supportive services.



The KY Caucus has made suggestions on HOME ARPA before, but based on the proposed HOME ARPA Allocation Plan we would like to identify the following:

- Capacity building – the addition of this program area will assist with the additional case management of the program as required by specific eligibility requirements. Funding to hire and train new staff to effectively deliver the programs/services will be needed. As the Fahe Members add HOME ARPA program work to our business models where we have existing delivery systems, more staff will be needed to make the use of the funds effective. This applies to the additional referrals, counseling, technical assistance or administrative tasks for processing applicants that will not be addressed while working with the eligible households that will be addressed.
- We encourage using the broadest definition possible for the homeless, those at risk of homelessness, and those in unstable housing situations for the most efficient use of these funds.
- We encourage maximum subsidy limits for development of permanent rental housing and for the qualifying households and consider targeting vulnerable populations for the development of supportive housing. Any actions that would enhance the ability of rural rental developments to cash flow such as funding for reserves for future operations. In Eastern Kentucky where Fahe Members implement affordable housing activities, they do this with median incomes per county that are approximately half the national median income and poverty rates that are almost double the national average. The income level of many families in the Eastern Kentucky area is a barrier to affordable housing and there is a shortage of affordable rental units in the region. The cost of rent for a modest two-bedroom apartment is out of reach for these financially burdened households and their incomes are insufficient to support the family moving to homeownership. Serving this area of the Commonwealth requires deep subsidy and programmatic flexibility to meet underserved needs.

Should KHC have any questions regarding these comments, or if Fahe or KY Members can be of assistance, please don't hesitate to call.

Sincerely,

*Cassie Hudson*

Cassie Hudson  
Kentucky Caucus Chair