GEORGIA DEPARTMENT
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HOME-ARP: Qualifying Populations & Administering a Tenant Selection Plan

2025 COSCDA Annual Training Conference
Wednesday, September 17, 2025
10:15 – 11:45 am

GEORGIA DEPARTMENT
of COMMUNITY AFFAIRS

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Four Qualifying Populations

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Background

- ARP established four “qualifying populations,” referred to as “QPs”
- Unlike the regular HOME Program, individuals and families are eligible for assistance based on status as a QP, not income
- Congress defined 3 of the four QPs in statute
- PJs and providers must understand these definitions and how they differ from those in other HUD programs
  - For example, some HOME-ARP QP definitions differ from definitions used in the Continuum of Care (CoC) program and the Emergency Housing Voucher (EHV) programs.

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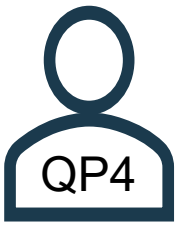
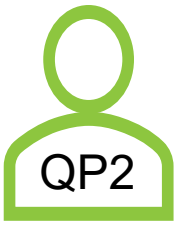
Qualifying Populations (QPs)

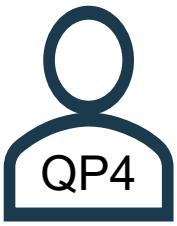
Households that are experiencing homelessness
24 CFR §91.5



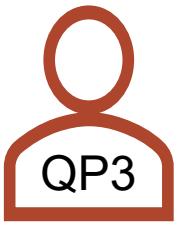
Other households requiring services or housing assistance to prevent returning to homelessness
CPD 21-10



Households at Risk of Homelessness with incomes below 30% Area Median Income (AMI), or up to 50% AMI with waiver
24 CFR §91.5 & CPD 21-10



Households at 30% AMI with severe housing cost burden defined as paying more than 50% of monthly household income
CPD 21-10



Households fleeing or Attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking
HUD 24 CFR §5.2003

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Preferences and Limitations

Preferences establish order in which applicants are admitted to project or activity by providing priority in the selection of applicants among QPs (e.g., homeless QP) or subpopulation within a QP (e.g., persons with disabilities within one or more QPs).

Limitations exclude certain QPs or subpopulations of QPs from eligibility for a project or activity.

Preferences and Limitations cannot be applied to HOME-ARP Supportive Services.

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Preferences and Limitations

Method of Prioritization is a process by which PJ, CoC Coordinated Entry (CE), subrecipient, or project owner determines how two or more eligible QP applicants who qualify for the same or different preferences are selected for HOME-ARP assistance

A PJ cannot implement a method of prioritization if it does not also establish preference/preferences (without a preference, PJ admits applicants to HOME-ARP projects or activities in chronological order)

CEs routinely implement methods of prioritization for CoC programs

Preferences and Limitations cannot be applied to HOME-ARP Supportive Services.

Preferences and Limitations

- **Preferences and Limitation Challenges**
  - Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those listed in 24 CFR 5.105(a).
  - HOME-ARP rental housing or NCS may be limited to a specific subpopulation of a QP so long as admission does not discriminate against ***any protected class under federal nondiscrimination laws*** in 24 CFR 5.105.
    - Race
    - Color
    - National Origin
    - Religion
    - Sex [including gender identity and sexual orientation]
    - Familial status [the presence of children under the age of 18 in a household]
    - Disability

Items to Note

Data Driven: A HOME-ARP Participating Jurisdiction (DCA) "should not impose a limitation on eligibility unless it is necessary to address a greater gap in effective housing, aid, benefit, or services in **the PJ's geographic area** and the HOME-ARP project or activity cannot address the gap through the use of a preference."

Page 4 of the HOME-ARP Policy Brief

Equal Access: A HOME-ARP Participating Jurisdiction (DCA) "that imposes a limitation on a HOME-ARP project or activity must fund other HOME-ARP projects or activities that **provide access to all other QPs** to avoid excluding any of the four QPs from its overall HOME-ARP program, in violation of the HOME-ARP statute."

Page 5 of the HOME-ARP Policy Brief

(https://www.ncsha.org/wp-content/uploads/HOME-ARP_preferences_priortization_policy_brief.pdf)

Questions to Consider

What are the preferences or limitations to consider?

Do you have statewide data to support your preference/limitation request?

Who will be making the referral to the unit?

Who will serve this population?

Also consider local referral resources when making this request. They are needed for all HOME-ARP Referrals.

Substantial Amendments

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Allocation Plans & Substantial Amendments

- Allocation plan must address needs & housing/shelter/service gaps of each QP
- A PJ may establish reasonable preferences for HOME-ARP projects and activities
- Preferences must be identified in allocation plan
- ARP requires a PJ provide all four QPs with access to its HOME-ARP projects and activities
- This means that all four QPs must be eligible to apply for/be referred to HOME-ARP projects and activities
- Implementation of preferences may not exclude or remove eligibility of any QP from its HOME-ARP program
- PJs must design and administer its HOME-ARP program to ensure that all QPs have access to their programs

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Substantial Amendments

- A substantial amendment to the HOME-ARP allocation plan is required if:
  - A PJ changes the method of distributing funds;
  - To carry out an activity not previously described;
  - **To change the purpose, scope, location, or beneficiaries of an activity; and,**
  - **To add new preferences not previously described in the plan.**
- PJs must make the proposed substantial amendment available to the public and provide for a 15-day public comment period prior to submission.
- Substantial amendment must be submitted to HUD.

Substantial Amendments

Ways to submit the amendment

- Redlined Word or PDF Document: This option shows tracked changes for transparency.
- Clean Final Version: The updated plan without markup.
- Summary of Changes: A separate document or section outlining what was changed and why.
- Be sure to include good data to support the Substantial Amendment
- Always include an Executive Review
- Be sure to let your HUD regional office know

Referral Methods

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Three Types of Methods

- **Expanded Coordinated Entry**
  - PJ can contract with CE or CEs operating within its boundaries to accept applications and refer clients to HOME-ARP projects/activities only if:CE expands to accept all HOME-ARP QPs
  - It applies preferences and prioritization in accordance with the preferences and prioritization established in the PJ's HOME-ARP allocation plan
- **Coordinated Entry with Other Referral Methods**–PJ can use CE for certain QPs and supplement with referrals from other agencies or project-specific waiting lists to ensure access to all
- **Project/Activity-Specific Waiting Lists**–established for each HOME-ARP project or activity (Can be used with or without preferences)
  - All qualifying households that apply are placed on the list. Applicants:
    - Selected in accordance with any preference or method of prioritization established for project and adopted in allocation plan: OR
    - Selected in chronological order, to the extent practicable.
- If a PJ does not have preferences, this is default referral method and applicants are selected in chronological order
  - CE and other agencies can refer clients to the waiting list

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Things to Consider

- PJ's decisions re: preferences, methods of prioritization, and limitations will have an effect on the referral methods it uses for projects and activities
- PJs must also take the differences between HOME ARP QP definitions and similar definitions used in other HUD programs into account.
- CoC CE cannot be used without being expanded /augmented because:
  - CEs don't include all QPs; all QPs must have access to HOME-ARP
  - CEs employ methods of prioritization which: 1) implement preferences; and 2) may not be the preferences or methods of prioritization the PJ adopted for HOME-ARP
- For additional discussion of referral methods, see Section IV of the HOME-ARP Notice (CPD 21-10)

Things to Consider

- Encourage partnerships that amplify the programs reach (libraries, health department, public transportation hubs)
- Provide culturally and linguistically appropriate marketing (translation & interpretation services)
- Consideration for persons with disabilities (large print, Braille, captions, TTY)
- Choose effective outreach channels (flyers at shelters, street outreach, faith groups, social media, community boards, public service announcements)
- Craft a great message (keep it clear and straight to the point, address immediate needs & benefits). Provide an action step, "Call Today" "Visit our drop-in center".
- Lastly ensure you include **all "qualifying populations"** in all notices and publications if there are no limitations

Ideas on where to provide services

Office Location

- A dedicated physical space for HOME-ARP participants to receive supportive services

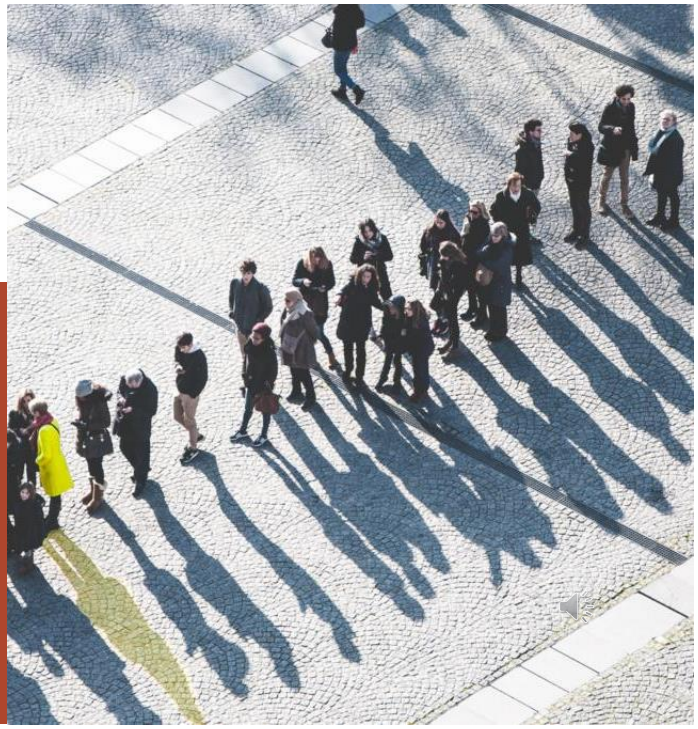
Satellite Office

- A dedicated space where the supportive services are regularly delivered, for example:
  - The Department of Family and Children's Services,
  - The Health Department, and
  - The Local Senior Citizens Center

Outreach – Supportive Services

- Community events
- Social Media and Online Platforms
- Partnership with Local Media

Waitlists & Intake Process



Waitlist Steps

Step 1	Step 2	Step 3	Step 4	Step 5
Qualify the HOME-ARP Household	Review services received to avoid duplication	Put the household on your HOME-ARP Waitlist	When the household is next on the waitlist, choose appropriate HOME-ARP services	Distribute and document needed services

Policy Considerations

Non-Duplication of Services

- HUD requires that a program participant receive only the HOME-ARP services needed so there is no duplication of services or assistance in the use of HOME-ARP funds for supportive services.
- This includes the use of the Homeless Management Information Systems in coordination with your local supportive service providers, CoCs, and other nonprofit organizations

Assistance Limitations

- PJ needs to establish Policies on
  - Length of assistance
  - Receiving HOME-ARP Services again, if they re-qualify for HOME-ARP and meet Qualifying Population Criteria
  - Maximum assistance amounts.

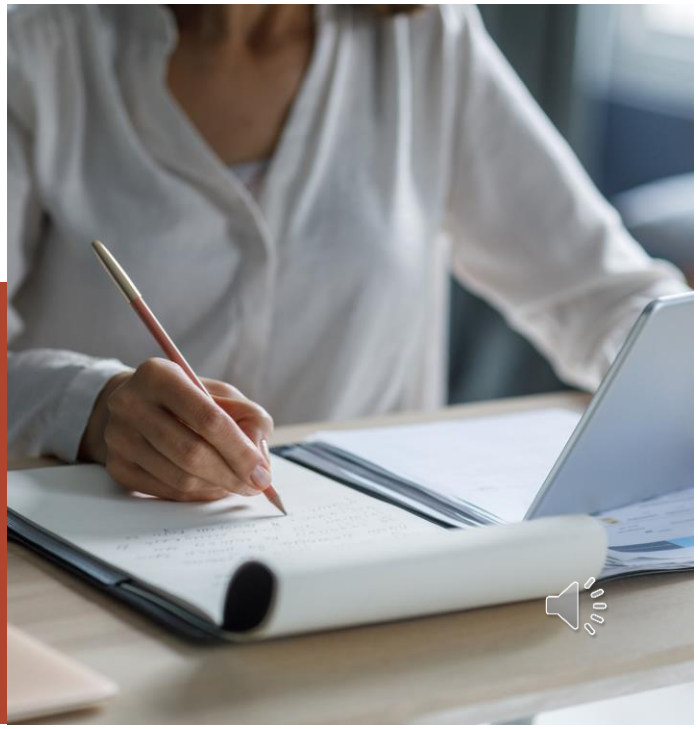
Quarterly HUD Reporting

GHFA is required to collect data on the following data for HUD:

- Total: This is the total number of households served each quarter.
- New Households

  This is the number of households who were served in this quarter but who were not served in the previous quarter. For the first quarter in which the PJ is reporting, the number of "New Households" will be automatically populated to match the "Total." This is because all households are being served for the first time in the first quarter.
- Veteran: A household with any Veteran member.
- Hispanic: The number of Hispanic households served.
- Race: (The sum of the sub-categories below must be equal to or less than the "Total")
  - White
  - Black
  - Asian
  - American Indian/Alaskan Native
  - Native Hawaiian/Pacific Islander
  - Other/Multi-Racial
- Household Size: (The sum of the sub-categories below must be equal to or less than the "Total")
  - 1 – 7 or
  - 8+
- Household Type: (The sum of the sub-categories below must be equal to or less than the "Total")
  - Single, non-elderly
  - Elderly
  - Single Parent
  - Two Parents
  - Other

Tenant Selection Plan



Purpose of the Tenant Selection Plan

The development of a tenant selection plan ("TSP") discloses the policies and procedures that will be implemented in marketing and selecting eligible, qualifying households to occupy HOME-ARP-assisted units in full compliance with HOME-ARP regulations at HUD Notice CPD-21-10, HOME-ARP Appendix-Waivers and Alternative Requirements, State Agency/PJ requirements, and applicable federal guidelines.

Tenant Selection Plan Policies and Criteria

- Limits eligibility to households that meet one of the HOME-ARP 4 QPs,
- Cannot exclude an applicant with a voucher under the Housing Choice Voucher Program in accordance with 24 CFR 982 or an applicant participating in HOME, HOME-ARP, or other federal, state, or local tenant-based rental assistance program,
- Limitations or preferences must be approved by HUD in the allocation plan and be incorporated into the written agreement,
- Limitations or preferences cannot violate nondiscrimination requirements in as stated in 24 CFR 92.350,
- Prompt written notification must be given to any rejected applicant of the grounds for any rejection, and
- TSPs must comply with the VAWA requirements as described in 24 CFR 92.359.
- For project-specific waitlist, selection of households is conducted in chronological order.

Tenant Selection Plan Policies: What Should be Included?

- Eligibility Determination and Selection
- Referrals
- Preferences/Limitations-IF APPLICABLE
- Waiting List Procedures
- Application Documents & Intake
- Income Determination
- Acceptance of Unit
- Occupancy Standards
- Housing Retention Plan-Eviction Prevention
- Non-Discrimination Policy (CFR 92.350)
- Affirmative Marketing Procedures (CFR 92.351(a))
- VAWA Disclosures (24 CFR 92.253(a) & .359(c))
- Unit Transfers
- Accessible Units

Tenant Selection Plan Policies: What Should be Included?

- Income Determination
- Rent Limits
- Acceptance of Unit
- Occupancy Standards
- Housing Retention Plan-Eviction Prevention
- Reasons for Non-renewal of Lease or Evictions
- Rents & Fees (24 CFR 92.252 (d) & (f)
- Lease & Tenant Protections (24 CFR 92.253)
- Recertification
- Conflict of Interest (24 CFR 92.356)
- Modifications
  - Leave a space for your agency to modify the TSP as needed for compliance and when HUD regulations or property policies change

Common Tenant Selection Plan Mistakes

- Creating discriminatory preferences
  - Establishing preferences that limit eligibility based on protected characteristics like:
    - Sex,
    - Family, or
    - Specific Disabilities-unless this specific category is identified in the HOME-ARP allocation plan as having unmet needs and the preference is used to narrow the gap in benefits and services received by such persons, HOME-ARP Notice, Section C(1) Preferences.
- Limiting access for Qualifying Populations
  - Failing to provide all 4 QPs access to apply for at least one of the participating jurisdiction's (PJ) HOME-ARP activities.
- Establishing single-sex or disability-specific shelters
  - Limiting eligibility for shelters or housing based on sex, or restricting it to people with a specific disability, is a fair housing violation.

Preferences and/or Limitations ***must*** be consistent with those approved by HUD in the HOME-ARP allocation plan and established in the written agreement.

Why is a Tenant Selection Plan Important?

- Regulatory Compliance
- Fairness and Transparent Access
- Consistency in Decision-Making
- Meets Program Goals
- Success for Tenants in Promoting Housing Stability

A Tenant Selection Plan is important because it is the roadmap for fair, consistent, and compliant leasing of HOME-ARP units. It balances the program's purpose (serving qualifying populations) with HUD's legal and regulatory requirements.

In Review

HOME-ARP is about:

Access to Low Barrier Services

Equity
Congress intended that all four QPs be served with HOME-ARP

The absolute end result…

Housing Stability for more Households

Georgia Department of Community Affairs

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Thanks!

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