

HOME-ARP Allocation Plan

AMENDMENT

Participating Jurisdiction: Manatee County

Date: October 24, 2023

The HOME-ARP Allocation Plan has been developed to describe how Manatee County intends to distribute the \$ 2,362,768.00 of HOME-ARP funding and how these funds will be utilized to address the needs of HOME-ARP qualifying populations. The HOME-ARP Allocation Plan received approval from the U.S. Department of Housing & Urban Development (HUD) on July 6, 2023.

An Amendment to the approved HOME-ARP Allocation Plan is required to allow Manatee County to change the method for distributing HOME-ARP funds across different types of eligible projects. Manatee County intends to also fund activities under Development of Affordable Rental Housing, Non-Profit Operating and Non-Profit Capacity Building that serve individuals that meet the status of Qualifying Populations, and therefore is proposing an overall revision of the original Funding Description to account for the newly intended activities. Submittal of the Amendment to the FY 2021 HOME-ARP Allocation Plan to HUD will occur around November 14, 2023.

Template:

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

Manatee County developed a robust consultation process to meet HUD's requirements and to ensure that the County considers all priority needs within the community.

On December 13, 2022, the County conducted an online/virtual Consultation/Needs Assessment Forum using the Microsoft Teams platform. There were approximately 13 participants in attendance, representing the continuum of care, housing, and public service providers from across the county. Manatee County staff and consultants were also in attendance, bringing the overall attendance to 26.

On December 14, 2022, the County conducted a second online/virtual Consultation/Needs Assessment Forum using the Microsoft Teams platform. There were approximately 6 participants in attendance, representing the continuum of care, housing, and public service providers from across the county. Manatee County staff and consultants were also in attendance, bringing the overall attendance to 13.

These representatives were from agencies that uniquely serve the qualifying populations under HOME-ARP. Further information about all consultation is detailed in the table below.

To provide an environment that would allow for all attendees to be heard, a multi-faceted approach was used. The first approach was to present an educational PowerPoint that explained the purpose of drafting a HOME-ARP Allocation Plan, the activities and populations eligible for

HUD funding, and the schedule that the County will follow to adopt the HOME-ARP Allocation Plan in the first quarter of 2023.

The second approach was to provide an opportunity for comment during a facilitated discussion. Discussion was facilitated by the County's consultants. During the discussion, the participants were asked to speak openly regarding the unmet needs of qualifying populations in the county.

Once participants identified a number of gaps in housing inventory and service delivery systems, the attendees were asked to identify which gaps should be considered priority needs, and whether any particular subpopulation among the qualifying populations, as defined in the HOME-ARP program, have a more significant need for assistance.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Manatee County (Various Departments)	Other government – Local; Civic Leaders	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
AM & FM Enterprises, Inc.	Services – Elderly Persons; Services – Persons with Disabilities	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Catholic Charities Diocese of Venice	Services – Homeless and At-Risk of Homelessness; Other – Food Assistance; Services – Children; Services – Education; Services – Housing; Services – Elderly Persons	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Salvation Army	Services – Homeless	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Suncoast Partnership to End Homelessness	Continuum of Care	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Take Stock in Children – Manatee	Services – Children; Services – Education	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Gulfcoast Legal Services	Services – Victims of Domestic Violence; Other – Legal Assistance	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Turning Points	Services - Homeless	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities

Jewish Family and Children’s Service of the Suncoast	Other – Services – Veterans; Services – Elderly Persons; Other – Food Assistance; Services – Homeless; Other – Mental Health Counseling; Services – Employment	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
United Way – Suncoast	Services – Education	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Legal Aid of Manasota	Other – Legal Services (victims of domestic violence, victims of discrimination, housing, etc.)	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Manatee County Housing Authority	Public Housing Authority	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities

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

The consultation process resulted in the identification of the following priority needs. Each of these needs were identified several times throughout the consultation process:

Affordable Housing

- Affordable housing (inventory/supply)
- Housing rehabilitation
- Partnerships with private developers for set asides to provide affordable housing

Rental Assistance

- Financial assistance (security deposits, up-front costs)
- Rental assistance, short-term and long-term support
- Interim rental assistance for persons losing existing/previous assistance
- Tenant-Based Rental Assistance (TBRA)

Supportive Services

- Non-profit operating and capacity building
 - Navigator program for wrap-around services and case management
- Financial literacy education

Priority Populations

- Families with children at risk of homelessness

Although the forum participants identified many important unmet needs during the small group and whole group discussions, the following unmet needs were ultimately prioritized:

- TBRA/rental assistance (short-term and long-term) and financial assistance (other costs)
- Availability of affordable rental housing
- Supportive services, multiple wrap-around services
- Skilled/specialty case management.

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: 2/9/2023*
- *Public comment period: start date – 2/13/2023 end date – 2/28/2023*
- *Date(s) of public hearing: 2/28/2023*
- *Amendment Public comment period: start date – [10/30/2023](#). end date – 11/14/2023.*

Describe the public participation process:

In accordance with HUD guidelines, Manatee County held a 15-day public comment period to obtain comments from County residents, agencies, and anyone else who wished to review and comment on the HOME-ARP Allocation Plan. Following the public comment period, the County held a public hearing on February 28, 2023 to get feedback on the proposed funding activities. The final adoption of the substantial amendment to approve the HOME-ARP Funding Allocation Plan was held at the Board of County Commissioners meeting on February 28, 2023. [The Amendment draft was available for public review during a 15-day comment period from October 30, 2023 through November 14, 2023.](#)

Describe efforts to broaden public participation:

Manatee County published a public notice for the public hearing and the comment period to broaden public awareness and participation in the development of the HOME-ARP Allocation Plan. A 15-day public comment period is required, which the County held before the public hearing to allow more time for citizens to review the plan and provide comment. Additionally, the County followed its citizen participation plan, which guides all public participation efforts in a manner that promotes transparency and encourages active participation from residents, especially HOME-ARP qualifying populations. The 15-day comment period and public hearing

was held after the County's consultation/needs assessment forum campaign, which included two (2) consultation/needs assessment forums with stakeholders that work with qualifying populations.

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

Manatee County received one written public comment during the 15-day comment period. This public comment supported the need for additional affordable housing in Manatee County. This comment was also presented during the public hearing with the Board of County Commissioners.

The County also received comments from the Florida Housing Coalition (FHC), stating that it should be further emphasized that the data presented in the HOME-ARP Allocation Plan includes Continuum of Care data that covers both Manatee and Sarasota counties (i.e., regional needs). The FHC provided additional, granular data that is more specific to Manatee County, alone, which shows that permanent supportive housing is not available in Manatee County. The FHC also supported the need for additional affordable housing in Manatee County.

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

All comments and recommendations were accepted and considered in the development of the County's HOME-ARP Allocation Plan.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Template:

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	122	25	361	N/A	10								
Transitional Housing	164	52	161	N/A	35								
Permanent Supportive Housing	194	49	180	N/A	251								
Other Permanent Housing	0	0	60	N/A	0								
Sheltered Homeless						56	446	67	37				
Unsheltered Homeless						3	487	36	20				
Current Gap										No Gap	No Gap	171	N/A

Suggested Data Sources: 1. 2022 Point in Time Count (PIT), January 24, 2022; 2. 2021 Continuum of Care Housing Inventory Count (HIC) (Sarasota, Bradenton/Manatee, Sarasota Counties CoC)

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	99,620		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	930		
Rental Units Affordable to HH at 50% AMI (Other Populations)	4,249		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		3,709	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,055	
Current Gaps			1,585

Suggested Data Sources: 1. 2021 American Community Survey (ACS) 1-Year Estimates; 2. 2013-2017 Comprehensive Housing Affordability Strategy (CHAS)

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

Homeless as defined in 24 CFR 91.5

Homelessness affects all races and ethnicities; however, in Manatee County white and black individuals are most impacted by homelessness. Of the 1,138 homeless individuals counted in the 2022 Point-In-Time counts for the continuum of care region completed on January 24, 2022, 866 (over 76%) individuals were white, and 233 (over 20%) of individuals were black. The remaining 4% of homeless individuals identified as other minority races. Only about 3.9% of the total counted homeless population identified as Hispanic or Latino.

More than 83% (952) of all homeless individuals counted were adults in households without children. There were 180 (nearly 16%) homeless individuals counted in households with children, and 6 homeless individuals counted in households that contained only children (under the age of 18).

While the Point in Time gives a snapshot of the state of homelessness, it is important to note the limitations of the data. The data represents a single night and does not capture homelessness experienced at different time periods throughout the year. Additionally, the count does not include individuals at risk of homelessness such as those living with relatives or friends and those living in motels.

The Suncoast Partnership to End Homelessness (Suncoast Partnership) indicates that there have been 4,059 homeless individuals that have entered their homeless prevention, permanent supportive housing, public housing, homeless shelter, rapid-re-housing, transitional housing, and street outreach programming since October of 2018.

At Risk of Homelessness as defined in 24 CFR 91.5

According to HUD's FY 2022 Low- and Moderate-Income Summary Data (LMISD), there are approximately 132,290 low- and moderate-income individuals within the Urban County. This represents nearly 42% of the Urban County's population according to HUD. Of Manatee County's 191 Block Groups, 66 Block Groups are characterized as having more than 51.00% of the population designated as low- and moderate-income. This suggests that a significant percentage of the County's population has an income of less than 80% AMI and may be at increased risk of homelessness or in need of additional supportive services and assistance to prevent homelessness and housing instability.

The Comprehensive Housing Affordability Strategy (CHAS) data captures information on housing problems and housing needs. There are four types of housing problems captured. These four types are:

- 1) housing unit lacks complete kitchen facilities;
- 2) housing unit lacks complete plumbing facilities;
- 3) household is overcrowded; and

4) household is cost burdened.

HUD defines cost-burdened families as those “who pay more than 30 percent of their income for housing” and “may have difficulty affording necessities such as food, clothing, transportation, and medical care.” Severe cost burden is defined as paying more than 50 percent of one's income on rent.

According to 2013-2017 CHAS, there are 1,083 low- and moderate-income renter households (<80% AMI) that experience crowding of more than 1 person per room. Additionally, there are 309 renter households in the 0-30% AMI income group that are experiencing cost burden greater than 30%, and 3,143 renter households in the 0-30% AMI group that are experiencing cost burden greater than 50%. Due to crowding, income levels, and cost burdens, the households within these groups are at risk of homelessness.

The 2013-2017 CHAS data indicates housing problems, including cost burden, by renter income group. The table is included below:

	Renter				Total
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	
Substandard Housing - Lacking complete plumbing or kitchen facilities	63	150	45	35	293
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	60	59	55	45	219
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	440	210	259	135	1,044
Housing cost burden greater than 50% of income (and none of the above problems)	3,143	2,630	744	20	6,537
Housing cost burden > 30%-50% of income (and none of the above problems)	309	1,994	3,080	1,122	6,505
Zero/negative Income (and none of the above problems)	709	0	0	0	709

Data Source: 2013-2017 Comprehensive Housing Affordability Strategy (CHAS), sourced from January 2023 IDIS output.

Renters with housing problems, especially in the 0-30% AMI group, are at-risk of homelessness and are more susceptible to economic, social, and environmental changes that may impact their housing situation. Therefore, there are approximately 13,241 low- and moderate-income renters (below 80% AMI) that may be at-risk of homelessness. The numbers in the above table are not double counted, each household counted fits into only one category.

Manatee County's Emergency Rental Assistance program is one way of combatting homelessness and is a reliable indicator of the populations requiring additional rental, financial, or utility assistance to remain safely in their homes. In 2021, there were 2,454 total household applications submitted to the Emergency Rental Assistance program, and of these applicants 1,959 received assistance from the county. Eligible applicants can receive assistance for up to 18 months, and all applicants receiving assistance are below 80% AMI (low- and moderate-income). Evidently, there is a need for additional supportive services to prevent homelessness among those most at-risk.

Lastly, the Suncoast Partnership indicates that there have been 2,791 at-risk of homeless individuals that have entered their homeless prevention, permanent supportive housing, public housing, homeless shelter, rapid-re-housing, transitional housing, and street outreach programming since October of 2018.

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

In total, 57 (about 5%) homeless individuals counted identified themselves as victims of domestic violence. According to the Florida Department of Law Enforcement, there were 2,343 domestic violence offenses in Manatee County alone in 2020. This were also 74 reports of rape and 1,797 reports of simple assault in Manatee County for the same year. Victims of these crimes are susceptible to homelessness and housing insecurity.

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

The 2022 homeless Point-In-Time count identifies 103 homeless veterans on the date of survey, representing about 9% of the homeless population. Of this population, over one-third of these individuals were considered unsheltered and literally homeless. Two-thirds of this population currently resides in an emergency shelter or transitional housing.

The Suncoast Partnership indicates that there have been 510 "other" individuals that have entered their homeless prevention, permanent supportive housing, public housing, homeless shelter, rapid-re-housing, transitional housing, and street outreach programming since October of 2018. These populations that are categorized as "other" may include those populations identified as fleeing/attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other populations where assistance would prevent the family's homelessness; or serve those with the greatest risk of housing instability. Evidently, there are only those populations that have reached out for help or who have been offered help through the Suncoast Partnership programming. Due to the transient nature of homelessness, and the challenge of reporting/accountability in domestic violence, it must be assumed that this number is an undercount of those populations in need.

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):

There is a wide array of existing homelessness prevention services available in Manatee County including counseling, legal assistance, mortgage assistance, rental assistance, utilities assistance, law enforcement, mobile clinics, street outreach services, drug and alcohol abuse services, childcare, education services, employment and employment training services, healthcare services, life skills training, mental health counselling, transportation services, and food banks.

The Suncoast Partnership, the lead agency for the CoC, provides homeless services, such as emergency shelter and transitional housing, to qualifying populations in need. In conjunction with the Suncoast Partnership, several other non-profit and religious organizations serve the homeless population within the County. These include, but are not limited to, AM & FM Enterprises, Inc., Catholic Charities Diocese of Venice, Salvation Army, Turning Points, Jewish Family and Children's Service of the Suncoast, and Manatee County Housing Authority, among others.

To better address the needs of the area's homeless population, the Suncoast Partnership maintains an online resource page that houses a directory of homeless resources, education, crisis procedures, and other resources that may be useful to persons in need and agencies assisting persons in need.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

In Manatee County, members of the Continuum of Care, such as churches and nonprofit organizations, led by the Suncoast Partnership, provide homeless services such as emergency shelter and transitional housing. As noted above, some providers include AM & FM Enterprises, Inc., Catholic Charities Diocese of Venice, Salvation Army, Turning Points, Jewish Family and Children's Service of the Suncoast, and Manatee County Housing Authority, among others.

These organizations work independently and collectively to identify any unmet housing and service needs of qualifying populations. Based on the consultation process, the unmet housing and service needs are additional affordable rental units, specifically permanent supportive housing, rental/financial assistance, wrap-around supportive services, and non-congregate shelter for individuals and families.

Additionally, the 5-Year Consolidated Plan identifies priority needs of the homeless population in the county, which include mental/behavioral health resources, permanent supportive housing with case management, rapid re-housing, shelters and transitional housing (particularly for families with children), better access to affordable housing (e.g., rental assistance, HCV, etc.), housing for persons leaving prison or with a criminal background, and legal help when improperly evicted. Youth aging-out of foster care was also noted as an underserved population

needing case management, employment opportunities, and access to affordable housing to bridge the gap between foster care and adult life. The existing shelters and supportive service providers need additional funding as they work collaboratively to ensure satisfactory provision of services and future expansion of these services for those experiencing homelessness.

At Risk of Homelessness as defined in 24 CFR 91.5

The 5-Year Consolidated Plan identifies priorities related to persons experiencing homelessness and those at risk of homelessness. Among those needs are mental/behavioral health and substance abuse treatment services, and prevention activities including but not limited to access to employment training, affordable childcare services, financial services, homeless prevention services and shelters, and basic needs assistance including transportation assistance geared toward specific subpopulations (e.g., chronically homeless, families with children, veterans, and unaccompanied youth, persons with special needs). While there are existing shelters and supportive services for those experiencing homelessness, there may be a need for additional supportive services to prevent homelessness, including non-congregate shelter, transitional housing, emergency assistance and other moving assistance (rental deposit assistance, security deposit), and other rental assistance and utility assistance efforts. These efforts also contribute to the maintenance and availability of affordable housing for all income groups, especially qualifying populations.

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

Populations with unstable living environments may require additional financial assistance, such as rental assistance, down payment assistance, or utility assistance. These groups may also rely on transitional shelters and safe homes for temporary housing. Additional funding for capacity building for organizations that could provide these services would ensure that sufficient and decent housing is available for those that depend on it.

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

For non-homeless populations at greatest risk of housing instability, more affordable rental housing units, rental and financial assistance, housing counseling and legal services for eviction prevention, and other related supportive services are also needed to prevent future homelessness.

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

Manatee County has a robust shelter, housing, and service delivery system for individuals experiencing homelessness and who are at risk of becoming homeless. Some identified gaps may exist, including sufficient funding to support the volume and reach of homeless supportive services (including non-profit service providers that offer substance abuse and mental health services, services for homeless youth, and case management). The County will continue to financially support these programs, when possible, and aid in the identification of additional funding sources, and provide technical assistance to aid in the completion of grant applications.

The County maintains strong relationships with service providers, many of which participated in the consultation/needs assessment forums that informed the HOME-ARP Allocation Plan. The input received from service providers during the consultation process was critical to the identification of priority needs. Service provider involvement ensures successful programming to lessen the existing gaps in housing and services for qualifying populations.

The County is very engaged with the Suncoast Partnership and supports the organization in the implementation of the 10-Year Plan to End Homelessness. Additional improved and maintained coordination between these service providers and the County would benefit those populations at risk of homelessness and those experiencing homelessness by promoting a transparent and accessible communication strategy. Improved coordination would increase the dissemination of information about critical resources and supportive services, as well as improve the quality of those services.

An identified gap is the need for additional shelter facilities and affordable housing. In addition to financially supporting the closure of this gap through the HOME-ARP program, one way to reduce this need is for the County to continue to coordinate with the Continuum of Care, non-profit service providers, and other organizations to encourage the development of these types of housing.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Housing with one (1) or more housing problems is associated with instability. As shown in the *Housing Needs Inventory and Gap Analysis* table above, there are an estimated 6,764 households earning less than 50% AMI with at least one housing problem. Additionally, households experiencing cost burden and crowding may be experiencing housing instability and be at a greater risk of homelessness. According to the 2013-2017 CHAS data, there are 1,083 low- and moderate-income households (<80% AMI) that experience crowding of more than 1 person per room. Additionally, there are 309 households in the 0-30% AMI income group that are experiencing cost burden greater than 30%, and 3,143 households in the 0-30% AMI group that are experiencing cost burden greater than 50%.

Identify priority needs for qualifying populations:

While there are many important priority needs listed in Manatee County’s most recent 5-Year Consolidated Plan, the HOME-ARP Allocation Plan considers only the priority needs listed below, which reflect the comments received during the consultation/needs assessment forums and public participation process. These priority needs align with goals previously identified in the Consolidated Plan:

1. Housing: Improve availability, accessibility, and condition of affordable housing for low- and moderate-income and special needs households throughout Manatee County.
2. Social/Public Services: Expand the accessibility and coordination of social services to Manatee County low- and moderate-income, homeless, and special needs populations.

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

The most recent Housing Inventory Counts (January 2021) and Point-In-Time counts (January 2022) were used to develop the data presented in the tables and narrative above. The 2013-2017 CHAS and 2021 American Community Survey 1-Year Estimates were used to supplement the housing inventory and point-in-time county. Based on reported numbers, there are currently insufficient shelter beds for non-family adult populations experiencing homelessness. It should also be assumed that the reported count for homeless populations is an undercount. There is likely a gap in affordable housing for low- and moderate-income populations earning less than 50% AMI. There are only 930 rental units considered affordable to extremely low-income populations earning less than 30% AMI and only 4,249 rental units affordable to populations earning less than 50% AMI (total of 5,179 units affordable to those earning >30% and >30-50% AMI). According to 2013-2017 CHAS data, this means there are 19,991 households earning >30% AMI or >30-50% AMI that are not able to access affordable rental housing, though it should be noted that some of these households may be able to access affordable owner housing. Additionally, over 9,058 renter households with an income less than 50% AMI live in a house with one or more housing problems (substandard housing, some form of overcrowding, some form of housing cost burden). This represents nearly 36% of the total low-income population earning less than 50% AMI, suggesting there is a need for additional decent, affordable rental units.

Gaps related to coordination and supportive services were identified using previous performance of similar programs and previously identified community needs, as identified in the 2017-2022 5-Year Consolidated Plan. Additionally, through the consultation process the County identified gaps and needs based on outreach to housing and service providers.

HOME-ARP Activities

Template:

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

Manatee County will solicit applications for proposed projects from local housing developers, public service providers, and nonprofit organizations. The solicitation will be advertised on the County's website via a request for proposals after publishing a Notice of Funding Availability. All proposed project applications will submit a description of the organization, description of the

proposed project, and specify the requested funding amount. The County will evaluate all project proposals against the allocated budget and identified priority needs. Evaluations will be conducted by a review committee comprised of multiple persons. The applications will be reviewed for their compliance with the HOME-ARP program and benefits to qualifying populations prior to determining which projects to award.

Describe whether the PJ will administer eligible activities directly:

Manatee County does not intend to administer eligible activities directly. The County plans to administer the program through a number of subrecipients. Funding for eligible activities will be allocated directly to these subrecipients, with program compliance oversight and general administration/planning conducted by the County.

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:

Not applicable. No HOME-ARP administrative funds will be provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP Allocation Plan.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Template:

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 300,000.00		
Acquisition and Development of Non-Congregate Shelters	\$ 0.00		
Tenant Based Rental Assistance (TBRA)	\$ 708,353.00		
Development of Affordable Rental Housing	\$ 763,740.00		
Non-Profit Operating	\$ 118,130.00	5 %	5%
Non-Profit Capacity Building	\$ 118,130.00	5 %	5%
Administration and Planning	\$ 354,415.00	15%	15%
Total HOME ARP Allocation	\$ 2,362,768.00		

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

Given the emphasis on supportive services and rental assistance heard at all the consultation/needs assessment forums and the public hearing, and the dire need for shelter assistance, as indicated by the Point-In-Time Counts and Suncoast Partnership homeless and at-risk of homeless data in Manatee County, the County will allocate its HOME-ARP funding to supportive services, tenant-based rental assistance, [development of affordable rental housing, Non-Profit Operating and Capacity Building](#). The County is also reserving the maximum allowance for administration and planning efforts.

Throughout the consultation process, several priority needs came to the County's attention, including the need for wrap-around supportive services, and tenant-based rental assistance. Other specific needs were identified, most fell under the larger umbrella of supportive services (e.g., case management, short-term rental/financial assistance, etc.). [Affordable rental housing was identified as a need, and the County has an opportunity to support the development of additional units with anticipated affordable housing developments that are coming to the County in the upcoming years.](#) A few needs identified were not eligible given the parameters of the HOME-ARP program.

[In late Spring 2023, Manatee County has identified a building that is currently being rehabbed with local funds to become a new family homeless shelter. In addition to the new family homeless shelter, the County has also identified a parcel that will be developed to provide unsheltered individuals with basic infrastructure and supportive services. The County has identified that agencies will need resources for additional staff and operating expenses in order to offer effective management and supportive services to exit the served families into permanent housing. Therefore, HOME-ARP funds will be allocated to eligible activities under Non-Profit Operating, and Non-Profit Capacity Building to enable the County and its partnering agencies to increase needed human resources to serve Qualifying Populations.](#)

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:

As previously identified in the above sections, the qualitative and quantitative data presented indicates a need for projects that support the identified priority needs (tenant-based rental assistance and supportive services), and those that close the gaps in service delivery (increased capacity to support homeless populations and those at risk of becoming homeless through [Non-Profit Operating and Non-Profit Capacity Building](#)).

HOME-ARP Production Housing Goals

Template

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

Based on the funding available, Manatee County anticipates being able to fund the development of 5-7 units of permanent or transitional affordable rental housing dedicated to individuals and families that meet the status of one or more Qualifying Populations. The approximate per unit cost will range from \$100,000 to \$160,000

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:

Manatee County's 2023-2028 5-Year Consolidated Plan identifies the goal of "Housing: Improve availability, accessibility, and condition of affordable housing for low- and moderate-income and special needs households throughout Manatee County" & "Homeless Transitional and Supportive Housing": County's entitlement funding to assist in the creation/rehabilitation of 22 owner-occupied units of affordable housing units, in addition to the creation of 10 new beds/units of Emergency Shelter/Transitional/Supportive Housing during the 5-year period.

The expectation is that HOME-ARP funds will be able to support about half of the County's Homeless Transitional and Supportive Housing unit creation target for in the upcoming 5-year cycle. Other entitlement funding, funds from federal and state funds will be leveraged to meet owner-occupied unit creation target and ease the gap of quality affordable housing to low-income households.

Preferences

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

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

"Prioritization. In the context of the coordinated entry process, HUD uses the term "Prioritization" to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry

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

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

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

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

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ’s HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

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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:

Manatee County does not intend to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

Subrecipients of HOME-ARP funds administered by Manatee County, such as but not limited to CoCs, may have coordinated entry processes that establish priority based on need and according to established written standards. In such cases, the county will allow for need-based prioritization so long as such prioritization does not give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

Subrecipients will be required to demonstrate that the funded activity or project will be made available to all qualifying populations under the HOME-ARP program, consistent with civil rights and nondiscrimination laws and requirements, including fair housing and equal opportunity.

If a funded activity or project is later determined to necessitate preference for any reason, the HOME-ARP Plan will be substantially amended accordingly to reflect such limitation.

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:

Not applicable. Manatee County does not intend to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

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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):

Since Manatee County will not administer HOME-ARP projects directly (except for administration and planning), the County defers to the Continuum of Care (CoC)'s referral methods and coordinated entry procedures. The Suncoast Partnership is the CoC for the region, including Manatee County.

The County defers to the CoC's referral methods and coordinated entry procedures, which will prioritize the chronically homeless from all qualifying populations in order of longest length of time homeless. Additionally, the County will ensure that the CoC's coordinated entry process is utilized by any organization/subrecipient that receives the HOME-ARP funding.

The Suncoast Partnership outlines their Coordinated Entry and referral procedures here: <https://www.suncoastpartnership.org/helpful-links> under the CoC Written Standards link.

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 County will work with the Suncoast Partnership for coordinated entry procedures. Referrals for projects are made through the CoC. Several projects may include referral activities and will be completed by the corresponding HOME-ARP subrecipients; however, all qualifying populations are eligible for a project or activity and will be included in the coordinated entry process as necessary. Manatee County will ensure that the CoC's coordinated entry process is utilized by any organization/subrecipient that receive HOME-ARP funding.

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):

Since the County will not administer HOME-ARP projects directly (except for administration/planning), subrecipients are responsible for maintaining the prioritization requirements established in this plan. Since the County is not establishing preferences, the County will require that individuals and households from all qualifying populations are admitted to projects or activities chronologically in order of their application.

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):

Since the County will not administer HOME-ARP projects directly (except for administration/planning), subrecipients are responsible for maintaining the prioritization requirements established in this plan. Since the County is not establishing preferences, the County will require that individuals and households from all qualifying populations are admitted to projects or activities chronologically in order of their application.

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

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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:

Manatee County does not intend to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population. Any individual who belongs to any of the qualifying populations under HOME-ARP is eligible to benefit from the selected projects.

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:

Manatee County does not intend to implement a limitation to a particular qualifying population or specific subpopulation of a qualifying population. Any individual who belongs to any of the qualifying populations under HOME-ARP is eligible to benefit from the selected projects.

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):

Not applicable.

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***

Not applicable. Manatee County does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

- ***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.***

Not applicable. Manatee County does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

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

Not applicable. Manatee County does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

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

Not applicable. Manatee County does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

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

Not applicable. Manatee County does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

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

Not applicable. Manatee County does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.