

HOME-ARP Allocation Plan

DRAFT

Introduction & Background

In April of 2021, the City of Cambridge was awarded **\$2,325,283** by the U.S. Department of Housing & Urban Development (HUD) via the American Rescue Plan Act of 2021 (H.R. 1319). Signed into law on March 11, 2021, the Act directs resources to local communities to mitigate the health, housing and economic impacts of the COVID-19 pandemic through existing entitlement grant programs. These funds will be delivered to the City via its existing HOME Investment Partnership Act funding and will be henceforth known as HOME-ARP funds.

The utilization of HOME-ARP funds are limited to certain activities and specific beneficiaries as determined by HUD.

Eligible Activities

- **Rental Housing**
HOME-ARP funds may be used to acquire, rehabilitate, or construct affordable rental housing primarily for occupancy by households of individuals and families that meet the definition of one or more of the qualifying populations described below.
- **Tenant Based Rental Assistance (TBRA)**
HOME-ARP funds may be used to provide tenant-based rental assistance to qualifying households (**HOME-ARP TBRA**). HOME-ARP TBRA is a form of rental assistance that is attached to the household and not a particular rental unit.
- **Supportive Services**
HOME-ARP funds may be used to provide a broad range of supportive services to qualifying individuals or families as a separate activity or in combination with other HOME-ARP activities. Eligible activities include transitional housing, housing counseling, homeless prevention services and other Supportive Services as listed in Section 401(29) of the McKinney-Vento Act.
- **Acquisition & Development of Non-Congregate Structures**

A non-congregate shelter (NCS) is one or more buildings that provide private units or rooms as temporary shelter to individuals and families and does not require occupants to sign a lease or occupancy agreement. HOME-ARP funds may be used to acquire and develop HOME-ARP NCS for individuals and families in qualifying populations. This activity may include but is not limited to the acquisition of land and construction of HOME-ARP NCS or acquisition and/or rehabilitation of existing structures to be used for HOME-ARP NCS

Eligible Beneficiaries

HOME-ARP requires that funds be used to primarily benefit individuals and families in the following specified “qualifying populations.” Any individual or family who meets the criteria for these populations is eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria (e.g., additional income criteria).

- **Homeless (per 24 CFR 91.5)**
- **At-Risk of Homelessness (per 24 CFR 91.5)**
- **Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking or Human Trafficking (per 24 CFR 5.2003)**
For HOME-ARP, this population includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual’s or family’s primary nighttime residence or has made the individual or family afraid to return or remain within the same dwelling unit.
- **Other Populations (per section 212(a) of NAHA (42 U.S.C. 12742(a))**
Generally, this includes individuals and families that do not meet the criteria of the above described populations but are presently receiving services or assistance to prevent homelessness and/or those at greatest risk of housing instability based on income and cost of housing.

Consultation

In accordance with Section V.A of the HOME-ARPA Implementing Notice, before developing its HOME-ARP allocation plan, at a minimum, the City was required to consult with relevant agencies and key community partners on the areas of greatest need and preferred utilization of HOME-ARP funds, given its statutory parameters. These groups include:

- Continuum of Care serving the jurisdiction's geographic area,
- Homeless service providers,
- Domestic violence service providers,
- Veterans' groups,
- Public Housing Agencies (PHAs),
- Public agencies that address the needs of the qualifying populations, and
- Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

Consultation Process Summary

In August of 2022, the City reached out to Continuum of Care (CoC) and Emergency Solutions Grant (ESG) subrecipients, CoC Board members, other key shelter providers, and other relevant public agencies to seek input on the utilization of HOME-ARP funds. The City provided the origin and amount of the HOME-ARP funds and the Eligible Activities and Beneficiaries for its utilization.

Template:

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

Individuals and agencies were contacted directly. The City provided each with the HOME-ARP award amount, eligible activities and beneficiaries, as asked them to provide any comment or suggestion based on their perspective and experience.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Transition House	Domestic Violence, Homeless Services Provider (non-CoC or ESG), CoC subrecipient, CoC Boardmember, ESG subrecipient	Direct	Feedback.
HomeStart, Inc.	CoC subrecipient, ESG subrecipient, Homeless Services Provider (non-CoC or ESG)	Direct	Feedback.
Cambridge Housing Authority	Public Housing Agency, CoC Boardmember	Direct	Feedback.
Heading Home, Inc.	CoC subrecipient	Direct	Feedback.
Fenway Community Health / AIDS Action Committee	CoC Boardmember, CoC and ESG subrecipient	Direct	Feedback.
BayCove, Inc.	Coc and ESG subrecipient	Direct	BayCove, Inc. sought clarification on the definition of Non-Congregate Housing
Eliot Community Human Services	CoC subrecipient	Direct	Feedback.

First Church Shelter	Homeless Services (non-CoC or ESG)	Direct	Feedback.
Material Aid and Advocacy Program	Homeless Services (non-CoC or ESG)	Direct	
Solutions at Work	Homeless Services (non-CoC or ESG)	Direct	SAW endorsed a Non-Congregate Shelter use, citing a specific project/location.
Y2Y Harvard Square	ESG subrecipient	Direct	
Saint Patrick's Shelter / Catholic Charities	ESG subrecipient	Direct	
Hildebrand Family Shelter	ESG subrecipient	Direct	
YWCA	ESG subrecipient	Direct	
Salvation Army Shelter	ESG subrecipient	Direct	
Harvard Square Homeless Shelter / Philps Brooks House	ESG subrecipient	Direct	
Healthcare for the Homeless / Cambridge Health Alliance	Homeless Services Provider (non-CoC or ESG)	Direct	
ACT	CoC Boardmember	Direct	
On the Rise	Homeless Services (non-CoC or ESG)	Direct	
Bridge Over Troubled Water	ESG subrecipient	Direct	
Cambridge Public Health Department	Local Public Health Agency	Direct	

First Church – Friday Café	CoC Boardmember, Homeless Services Provider (non-CoC or ESG)	Direct	
Mount Auburn Hospital	CoC Boardmember, Local Hospital	Direct	
Department of Human Services Programs (DHSP)	City’s Public Services Department, CoC Boardmember	Direct	
MultiService Center (DHSP)	City’s Homeless Prevention and Services, CoC subrecipient Homeless Services Provider (non-CoC)	Direct	
Housing Liaison Office	City Manager’s Department Housing Information and Advocacy, Homeless Services Provider (non-CoC or ESG)	Direct	
Community Development Department, Housing Division	City’s Affordable Housing Planning Division, CoC Boardmember	Direct	
Cambridge Commission for	City Commission for ADA Compliance and Advocacy	Direct	CCPD Expressed the Need for More Affordable Housing

Persons with Disabilities (CCPD)			Opportunities for Individuals and Families with Disabilities
Cambridge Human Rights Commission (CHRC)	City Commission that Enforces the City’s Human Rights Ordinance and Fair Housing Ordinance	Direct	Additional housing options and support resources for voucher-holders, citing source of income discrimination. Additional housing options and support resources for those at risk of homelessness; particularly individuals with mental health needs. Supportive Services, resources could include funding additional social worker positions – whether centered with the housing itself or through appropriate City depts.
Cambridge Council on Aging (COA)	Division of Cambridge DHSP	Direct	
Cambridge Department of Veterans Services	Veterans Group	Direct	
New England Center and Home for Veterans	Veterans Group	Direct	
Volunteers of America	Veterans Group	Direct	
Boston VA	Veterans Group	Direct	
Bedford VA	Veterans Group	Direct	

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

Generally, respondents acknowledged the breadth of need for the targeted populations. There was support for each type of eligible activity.

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

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

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

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 – 2/9/2023 end date – 3/17/2023*

- ***Date(s) of public hearing: 2/15/2023***

Describe the public participation process:

Still on-going at time of DRAFT release

Describe efforts to broaden public participation:

HUD requires at 15 calendar day Public Comment period, the City established a 37 calendar day Public Comment period.

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

Still on-going at time of DRAFT release

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

Still on-going at time of DRAFT release

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	30,530		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2,835		
Rental Units Affordable to HH at 50% AMI (Other Populations)	565		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		4,710	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,345	
Current Gaps			

Affordable Housing Distribution by Neighborhood (as of June 30, 2021)

	Non-Profit / Other	Public Housing	Inclusionary Zoning	Privately Owned	Scattered Site FTHB	Total	% by Neighborhood
East Cambridge	69	389	682	0	21	1,161	13.6%
MIT	0	0	36	0	0	36	0.4%
Wellington-Harrington	326	215	4	64	11	620	7.3%
The Port	433	553	70	37	14	1,107	13.0%
Cambridgeport	593	475	65	151	13	1,297	15.2%
Mid-Cambridge	351	58	7	32	10	458	5.4%
Riverside	316	178	43	128	4	669	7.9%
Agassiz	49	16	4	40	2	111	1.3%
Neighborhood 9	215	92	33	240	7	587	6.9%
West Cambridge	37	8	6	0	5	56	0.7%
North Cambridge	454	578	364	511	16	1,923	22.6%
Cambridge Highlands	155	0	172	0	7	334	3.9%
Strawberry Hill	0	153	0	0	5	158	1.9%
TOTAL	2,998	2,715	1,486	1,203	115	8,517	100.0%
<i>% by Type</i>	<i>35.2%</i>	<i>31.9%</i>	<i>17.4%</i>	<i>14.1%</i>	<i>1.4%</i>	<i>100.0%</i>	

Non-Profit /Other Sponsored Housing: includes housing sponsored and/or owned by non-profit developers

Public Housing: includes all state and federally subsidized public housing and former public housing (e.g. RAD conversion) properties controlled and managed by the Cambridge Housing Authority

Inclusionary Housing: includes all privately-owned affordable housing created under the Inclusionary Housing Ordinance and similar zoning provisions

Privately-Owned Affordable Housing: includes all privately-owned and/or sponsored affordable housing properties, including limited equity cooperatives, and excluding Inclusionary Housing

Scattered-Site Homeownership: includes affordable homes purchased by first-time homebuyers, excluding those created through Inclusionary Housing and other developers.

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

Homeless as defined in 24 CFR 91.5

The latest Point in Time (PIT) count conducted on February 23, 2022, determined there to be 267 individuals in Emergency Shelters, 34 individuals in Transitional Housing and 75 unsheltered individuals.

Point-in Time Date: 2/23/2022

Summary by household type reported:

	Sheltered		Unsheltered	Total
	Emergency Shelter	Transitional Housing*		
Households without children ¹	246	13	75	334
Households with at least one adult and one child ²	21	21	0	42
Households with only children ³	0	0	0	0
	267	34	75	376

Total Homeless Households

Summary of persons in each household type:

Persons in households without children¹	246	14	75	335
Persons Age 18 to 24	21	1	6	28
Persons Over Age 24	225	13	69	307
Persons in households with at least one adult and one child²	49	56	0	105
Children Under Age 18	26	30	0	56
Persons Age 18 to 24	4	7	0	11
Persons Over Age 24	19	19	0	38
Persons in households with only children³	0	0	0	0
Total Homeless Persons	295	70	75	440

Demographic summary by ethnicity:

Hispanic / Latino Non-Hispanic / Non- Latino	Sheltered		Unsheltered	Total
	Emergency Shelter	Transitional Housing*		
	55	38	8	101
	240	32	67	339
Total	295	70	75	440

Demographic summary by gender:

Female	99	46	18	163
Male	193	24	56	273
Transgender	2	0	0	2
Gender Non-Conforming (i.e. not exclusively male or female)	1	0	1	2
Questioning	0	0	0	0
Total	295	70	75	440

Demographic summary by race:

	Sheltered		Unsheltered	Total
	Emergency Shelter	Transitional Housing*		
	121	36	11	168
Black or African-American	163	29	62	254
White	3	5	0	8
Asian	3	0	1	4
Asian	0	0	0	0
American Indian or Alaska Native	5	0	1	6
	295	70	75	440
Native Hawaiian or Other Pacific Islander				
Multiple Races				
Total				

Sheltered

Summary of chronically homeless persons in each household type:

Chronically Homeless persons in households without children ¹	131	0
Chronically Homeless persons in households with at least one adult and one child ²	8	0
Chronically Homeless persons in households with only children ³	0	0
Total Chronically Homeless Persons	139	0

Summary of all other populations reported:

Severely Mentally Ill	78	6
Chronic Substance Abuse	112	7
Veterans	9	0
HIV/AIDS	2	0
Victims of Domestic Violence	11	3
Unaccompanied Youth	21	0
Unaccompanied Youth Under 18	0	0
Unaccompanied Youth 18-24	21	0
Parenting Youth	3	5
Parenting Youth Under 18	0	0
Parenting Youth 18-24	3	5
Children of Parenting Youth	3	4

**Continuum of Care
Homeless Assistance Programs Housing Inventory Count Report**

	Family Units ¹	Family Beds ¹	Adult-Only Beds	Child-Only Beds	Total Yr-Round Beds	Seasonal	Overflow / Voucher	Subset of Total Bed Inventory		
								Chronic Beds ²	Veteran Beds ³	Youth Beds ³
Emergency, Safe Haven and Transitional Housing	48	119	203	0	322	67	17	n/a	0	0
Emergency Shelter	26	60	188	0	248	67	17	n/a	0	0
Transitional Housing	22	59	15	0	74	n/a	n/a	n/a	0	0
Permanent Housing	56	135	579	0	714	n/a	n/a	n/a	165	3
Permanent Supportive Housing*	23	60	404	0	464	n/a	n/a	179	165	0
Rapid Re-Housing	7	19	5	0	24	n/a	n/a	n/a	0	3
Other Permanent Housing**	26	56	170	0	226	n/a	n/a	n/a	0	0
Grand Total	104	254	782	0	1,036	67	17	179	165	3

At Risk of Homelessness as defined in 24 CFR 91.5

There is no single dataset reflecting all characteristics of households facing these conditions. Market rate rental housing is unobtainable for low and very low-income households, and over-crowding, instability and excessive housing cost burden threaten many individuals and families.

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
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Current Gaps			

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

The CoC uses several data sources to assess the needs related to domestic violence, dating violence, sexual assault, and stalking. The CoC recognizes that domestic violence needs are historically underreported, and that these data sources are not perfect, but the CoC utilizes all data sources available to understand the scope and types of needs in the community. The primary source used to assess the needs related to DV of persons accessing services through the CoC is data from Transition House, the CoC’s provider of housing and services for DV survivors. Transition House maintains a

comparable HMIS database, which produces deidentified aggregate reports for annual performance assessments for the CoC and ESG programs. The CoC also utilizes data from HMIS to assess the number of clients in different program types who are currently fleeing DV or who have experienced DV in the past. The CoC also reviews data from the following sources to assess broader community need: Cambridge Domestic and Gender Based Violence Prevention Initiative's Assets and Needs Assessment Report (qualitative data gathered through a 4 month series of interviews and focus groups); Cambridge Police Department's Domestic Crime Data (annual statistics about domestic incidents reported to police); Cambridge Public Health Department's Community Health Assessment; City of Cambridge's Community Needs Assessment; National Network to End Domestic Violence's Census; data from On the Rise, a drop-in center for homeless women; and the statewide SafeLink Domestic Violence Hotline's reports.

The CoC uses information from the above sources to quantify needs and gaps in the homeless service system for persons impacted by domestic violence; determine funding and training needs; improve communication of resources available to clients and staff; and engage in policy work to improve overall system coordination and functioning.

Housing and service programs available to households fleeing DV include: emergency shelter; permanent housing; safety planning; legal advocacy; public benefits advocacy; counseling and support groups; and services in languages other than English. Through training of CE staff and protocols for providing services while prioritizing safety and confidentiality, the CoC ensures that survivors of domestic violence, dating violence, sexual assault, or stalking have access to all of the housing and services available within the CoC's geographic area. Additionally, the CoC's Coordinated Entry policies and procedures state that households fleeing domestic violence who qualify for an emergency transfer from a CoC funded project shall have priority over all other applicants provided that the household meets all eligibility requirements.

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

Other populations where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

(1) Other Families Requiring Services or Housing to Prevent Homelessness is defined as households (i.e., individuals and families) who have previously been qualified as

“homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

(2) At Greatest Risk of Housing Instability is defined as household who meets either paragraph (i) or (ii) below:

i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);

(ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan

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:

N/A

Identify priority needs for qualifying populations:

Quality permanently affordable rental housing is the greatest need.

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:

HOME-ARP Activities

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

The City intends to collaborate with local non-profit housing agencies with which it has a long and successful track record of producing quality affordable housing.

Describe whether the PJ will administer eligible activities directly:

The City intends to administer the activity directly.

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

N/A

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

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ #		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ \$1,976,491		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 348,792	# %	15%
Total HOME ARP Allocation	\$ 2,325,283		

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

The creation of permanently affordable rental housing is the primary goal of the City, as established by the City Council in response to market rate housing cost escalation making housing unobtainable.

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:

The creation of affordable rental housing is dependent on investment from local, state, federal and private resources.

HOME-ARP Production Housing Goals

Template

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

The City intends to use its HOME-ARP allocation in concert with other resources to create permanently affordable rental housing, the number of which will be determined by the final project scope.

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

The availability of quality affordable housing units for low and very low-income individuals and families and the Qualifying Populations identified in the HOME-ARP Notice remains the greatest need in Cambridge. Expanding the number of units available to these populations is the most effective way of meeting this need.

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).

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

The City does not intend to give preferences within qualifying populations.

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:

N/A

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).

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):

The City intends to use the CoC's Coordinated Entry (CE) process for referral to HOME-ARP funded housing.

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):

All qualifying populations will be eligible.

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

The CoC's Coordinated Entry (CE) system covers 100% of the CoC's geographic area, which includes the entirety of the City of Cambridge. Any homeless household presenting within the CoC is eligible for an intake with CE. Operationally, CE is accessible through the entire geographic area by offering both fixed intake sites and mobile intake via outreach staff. The broad array of services and providers in the geography – including ESG and CoC programs, state family shelters, community meal programs, law enforcement community outreach teams, recovery coaches, substance use programs, faith-based providers, and MH crisis intervention teams – engage with the CE system by working together on client cases and directing new clients towards CE.

The CE uses a standard assessment process. Clients present at either the Cambridge Multi-Service Center primary access point or access Coordinated Entry intake in the field from designated outreach staff. Intake staff ascertain the subpopulation that the household belongs to (i.e. homeless individual, family at risk of becoming homeless, etc.) and then either assess them in the event that they are equipped as an access point for that subpopulation, or connect them to the appropriate access point if not (for example, a street outreach worker coming across someone who is housed but at-risk would help them schedule an appointment at the Multi-Service Center, which is the designated access point for that population). Following any needed triage as discussed above, Coordinated Entry intake staff administer the assessment

appropriate to that subpopulation and enroll the household in HMIS as appropriate. 3. The CE system, policies and assessment process are updated using feedback from stakeholders. In 2019 the standardized assessment tool was shortened and streamlined using feedback collected from participants and providers. The CE Working Group is currently engaged in a process mapping endeavor assisted by technical assistance providers to formalize feedback loops and facilitate more expedient updates based on data and feedback from participants and providers.

The CE's mobile access points – street outreach workers and mobile case managers – are designed specifically to reach clients with the highest barriers to accessing assistance. Street outreach workers are trained to engage clients who are not likely to seek services on their own or to present at a traditional service location. They also draw upon their relationships with clients who have historically refused to engage with any other services besides outreach. The fact that outreach workers make up a core component of the CE staff team and are trained assessors means they engage proactively with the most vulnerable households (particularly outdoor sleepers) resulting in intake/assessment of this population on the spot.

The CE system prioritizes people most in need of assistance through use of standardized assessment designed to identify those with highest severity of service needs and prioritization of chronically homeless persons with longest duration of homelessness.

Resources that are prioritized through CE-including PSH, RRH, and Housing Navigation-are allocated based on dynamic prioritization, ensuring that the clients most in need of these resources receive access to them in as timely a manner as possible. Housing Navigation staff assisting participants prioritized for permanent housing work to understand and honor client preferences throughout their engagement with participants. While the availability of resources directly prioritized through CE is significantly exceeded by the number of clients appropriate for these interventions, assessment staff maintains strong knowledge of local services and collaborations in order to provide referrals to community resources that may be of assistance, so that clients who are not highest prioritized can still receive timely and meaningful help

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):

N/A

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.

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

The City does not intend to limit eligibility.

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

N/A

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

N/A

