



Community, Housing, & Human Services Board

February 7, 2024, 4:00 p.m.

Hybrid Meeting – Microsoft Teams and City Council Briefing Center
808 W. Spokane Falls Blvd., Spokane, WA 99201

Vision: To provide opportunities that enhance the quality of life for Spokane's extremely low to moderate income population.

TIMES GIVEN ARE AN ESTIMATE AND ARE SUBJECT TO CHANGE	
4:00 – 4:10	Call to Order – Board Chair
	<ol style="list-style-type: none"> 1. Approval of Agenda: ACTION 2. Approval of Minutes: ACTION 3. Public Comment – Please restrict comments to items relevant to the CHHS Board
4:10 – 4:40	Board Education
	None
4:10 – 5:35	Discussion
	<ol style="list-style-type: none"> 1. Public Hearing for HOME ARP Substantial Plan Amendment and Approval to Submit to HUD – Heather Page: ACTION 2. Public Hearing for Citizen Participation Plan and Approval of Final Document – Tessa Jilot: ACTION 3. Open Public Comment Period for 2024 Annual Action Plan – Kimberly Babb: ACTION 4. Updating Bylaws 5. Retreat Planning
5:35 – 5:40	Director's Report
	1. Dawn Kinder/Richard Culton
5:40 – 5:50	City Council Updates
	1. City Council
5:50 – 5:55	Committee Updates
	<ol style="list-style-type: none"> 1. Council 2. Affordable Housing 3. RFP/Eval
5:55 – 6:00	Announcements
6:00	Adjournment – Board Chair

2023 Board Meeting Schedule

All Board meetings are held in person in the City Council Briefing Center and via Microsoft Teams from 4:00 p.m. to 6:00 p.m. unless otherwise posted.

[Click here to join the meeting](#)

January 3	July 3
February 7	August 7
March 6	September 6
April 3	October 2
May 1	November 6
June 5	December 4

AMERICANS WITH DISABILITIES ACT (ADA) INFORMATION: The City of Spokane is committed to providing equal access to its facilities, programs and services for persons with disabilities. The Council Briefing Center in the lower level of Spokane City Hall, 808 W. Spokane Falls Blvd., is wheelchair accessible and also is equipped with an infrared assistive listening system for persons with hearing loss. Headsets may be checked out (upon presentation of picture I.D.) through the meeting organizer. Individuals requesting reasonable accommodations or further information may call, write, or email Risk Management at 509.625.6221, 808 W. Spokane Falls Blvd, Spokane, WA, 99201; or mlowmaster@spokanecity.org. Persons who are deaf or hard of hearing may contact Risk Management through the Washington Relay Service at 7-1-1. Please contact us forty-eight (48) hours before the meeting date.

Attendance will be Updated After Meeting

Board Members	Jan. 3	Feb. 7	Mar. 6	Apr. 3	May 1	Jun. 5	Jul. 3	Aug. 7	Sep. 4	Oct. 2	Nov. 6	Dec. 4
Adriane Leithauser	X											
Barb Lee	X											
Pending – Council Member												
Vacant												
Vacant												
Wes Anderson (pending)	X											
Jeri Rathbun (Chair)	X											
Pending – Council Member												
Karen Ssebanakitta	X											
Leslie Hope	X											
Casey Bowers	X											
David Edwards	X											
George Dahl – County Rep	X											
Eric Robison	X											
Vacant – CoC Liaison (non-voting)												

STANDING COMMITTEE MEETING INFORMATION**Affordable Housing Committee:** Second Tuesday of each month, 10:30 a.m. - 12:00 p.m.

Arlene Patton, Adriane Leithauser, Phil Altmeyer, Andy Hoyer, Mark Muszynski, Patricia Kienholz, Gordon Graves, Diane Zemke, Michone Preston, Eric Robison

Evaluation & Review Committee: Third Wednesday of each month, 10:00 - 11:00 a.m.

Karen Ssebanakitta (Chair), Jeri Rathbun, Kim Taylor, Diane Zemke, Arlene Patton, Rowena Pineda, Barb Lee, David Edwards, Casey Bowers

Executive Committee: Third Wednesday of each month, 4:00 - 5:30p.m.

Jeri Rathbun, Adriane Leithauser, David Edwards, Karen Ssebanakitta

CA/CD: First Tuesday of each month, 5:30 to 7:00 p.m.

Refer to <https://my.spokanecity.org/chhs/> for more information on Board-related meetings and events.

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Community, Housing & Human Services Board

January 3, 2024
Meeting Minutes

Meeting called to order at **4:04 PM**.

Attendance/Introductions

- **Board Members Present:** Leslie Hope, Jeri Rathbun, David Edwards, Casey Bowers, Adriane Leithauser, Barb Lee, George Dahl, Karen Ssebanakitta, Eric Robison (late)
- **Staff Present:** Kimberly Babb, Tessa Jilot, Heather Page, Christy Jeffers, Amanda Martinez, Brian Walker, Richard Culton, Adam Schooley
- **Guests Present:** Nicolette Ocheltree, Wes Anderson, Cory Bonallo, Morgan (no last name given)

****The Attendance roster listed above may not capture all the individuals that attended virtually if they joined the meeting after it had started due to the limitations of the virtually meeting platform****

Approval of the Agenda:

MOTION by Leslie Hope, seconded by David Edwards, **to approve the Agenda; unanimously approved.**

Approval of the Minutes:

MOTION by Adriane Leithauser, seconded by Casey Bowers, **to approve the July, August, September, October, November, and December 2023 minutes; unanimously approved.**

Public Comments: (Related to HOME ARP – see attached.)

Board Education:

Point-In-Time-Count 2024 – Kimberly Babb

Discussion and Action Items:

HOME ARP Substantial Amendment: Heather Page provided an update on the HOME ARP Substantial Amendment and asked the board to open the public comment period. Some discussion followed. (Public Comment from Cory Bonallo attached.)

MOTION by Adriane Leithauser, seconded by Eric Robison, **to open the 15-day comment period with a report out to the CHHS Board in February of any comments; unanimously approved.**

Citizen Participation Plan: Tessa Jilot presented the Citizen Participation Plan and requested the board to open the public comment period. Some discussion followed.

MOTION by Leslie Hope, seconded by Casey Bowers, **to open the public comment period from January 3, 2024, through January 18, 2024, with a report out to the CHHS Board in February; unanimously approved.**

Affordable Housing Committee: Confirmation of removing Gordon Graves and adding Leslie Hope.

MOTION by Adriane Leithauser, seconded by David Edwards, **to confirm removing Gordon Graves and adding Leslie Hope.**

Recruitment: Jeri Rathbun reviewed the open positions including Adriane's position as she is terming in April and the need to recruit for those positions and the RFP Committee as well. Brian Walker and Kimi Clifton with the City will assist with promoting and accepting applications.

Retreat: Jeri Rathbun asked for people to think of dates in April for the retreat and the topics to be discussed. Please email Jeri Rathbun or Kimi Clifton for dates that will NOT work. The retreat should be about 5 hours long.

Director's Report: Richard gave a brief update on the TRAC amendment moving forward and CHHS staffing.

City Council Updates: Nicholette provided a brief update including that Wilkerson and Dillon are expected to be the Council Liaisons for 2024 – vote for confirming Council to various committees and boards is expected January 8th as well as updated Council rules. And some clarification on the TRAC listening session/discussion happening at the Homeless Coalition meeting happening on January 4th.

Committee Updates:

Affordable Housing: Adriane Leithauser – No meeting in December but there will need to be a meeting in January to review the SSO-only project parameters.

RFP: Karen Ssebanakitta – No meeting in December but there will be a meeting in January to review lessons learned from 2023.

- HHOS – Keri and Kimi updated the timeline with Council expected to approve on February 5th.

Announcements: Robert Lippman has resigned from the CoC and will no longer be the CoC Liaison for the CHHS Board. Jeri is coordinating with the CoC to fill that non-voting position.

Meeting Adjourned at 5:18 PM.

The next CHHS Board Meeting is scheduled for **February 7, 2024 from 4:00-6:00 pm.**

Public Comment:

Subject: HOME ARP Substantial Amendment

I am in support of the shift in funds needed to fulfill the requests for supportive services funds. However, I also would like for the CHHS council to look into barriers that keep the housing developers from applying for the funds currently available for new affordable housing units.

We can all agree the need is great for more affordable housing development. Since it is known that the requirements for using HUD funds demand what essentially amounts to extra work, which ones are seen by developers as “not worth the hassle” and are there other things that the council can do/offer/present that makes it worth the hassle? Is there a prestige aspect that is within the council’s power to provide, say with using the developers name during public progress updates? If the money itself isn’t incentive enough to apply, what would make it attractive? Being put on a list of preferred builders distributed to the various city departments that use developers? Name recognition in the press for their good work? I have little knowledge of what avenues the CHHS council has access to, so you would be better qualified to make suggestions. If developers can have their pick of “easy money” projects and there is no lack of work, then there needs to be some benefit beyond the money that makes building affordable housing a value to them. If there is political aspects, such as real estate investors interests blocking affordable housing development, how can the council work to eliminate those obstacles?

The bottom line is there will still be a large pot of money available for development even after requested supportive services funds are shifted. Let’s get those dollars put to use in our community to alleviate the daily suffering of good people in bad economic situations. “We tried” doesn’t actually have a positive impact on the homelessness crisis. New affordable housing units does.

Earnestly,

Cory Bonallo

Substantial Amendment to the City of Spokane HOME-ARP Allocation Plan, 2021 Annual Action Plan

Introduction

The City of Spokane is requesting an amendment to the HOME-ARP allocation plan approved by HUD on March 31, 2023.

The City of Spokane's Community, Housing, and Human Services Department (CHHS Department) issued a competitive request for proposal (RFP) for HOME-ARP funds in August 2023 as per the approved HOME-ARP allocation plan. Applications were reviewed by the Affordable Housing Committee, and funding recommendation made to the Community Housing and Human Service Board (CHHS Board) on November 8, 2023. Three applications for supportive services projects were recommended for funding and one development of affordable rental housing project was recommended for funding.

During the CHHS Board meeting on November 8, 2023, community members present at the open meeting expressed concern regarding the need for additional supportive services funds in Spokane. This concern stemmed, not only from the data available for public review regarding the overall increase in homelessness recorded during the 2023 PIT Count, but also from the overwhelming requests for funding to serve homeless and at-risk of homelessness households the City received during their annual funding cycle. In October 2023, the City of Spokane issued an RFP for local and State funds dedicated to housing and supportive services for homeless and at-risk of homelessness households. The City of Spokane received \$18.9 million in funding requests, for the \$7.6 million in funding available. The \$11.3 million shortfall in State and local funding to serve the homeless and at-risk of homelessness populations in Spokane is a cause for grave concern.

Tenant-Based Rental Assistance was also discussed. For the first time in the City's Point-In-Time (PIT) Count history, eviction was identified by 7% of survey respondents in 2023 as a cause of their homelessness. Spokane County continues to struggle with high rents and low incomes that make it difficult for households to afford basic housing. The threshold for handling small financial crisis, like a medical bill, or a car repair, for these households is low and can tip the scales in whether a household is able to pay rent or not in any given month. While TBRA is not a permanent solution, it can prevent eviction by providing households with immediate support during a household crisis.

Further conversations with the sole applicant for the development of affordable rental housing funds in the City's RFP, determined that the HOME-ARP qualifying population restrictions were incompatible with the requirements of the project's other funding sources. The applicant was not able to accept the HOME-ARP award.

The lack of applicants for the development of affordable rental housing funding in the competitive RFP resulted in the CHHS Department conducting additional consultations with affordable housing development sponsors/developers in November and December 2023. In those consultations, only one sponsor/developer expressed interest in applying for HOME-ARP funds for development of affordable rental housing due to the qualifying populations restrictions. The difficulty in awarding the HOME-ARP funds for the development of affordable rental housing, the overwhelming need for additional supportive services funding, the continuing need for tenant-based rental assistance, and the one-time funding nature of HOME-ARP justified the need for a substantial amendment to the City of Spokane's HOME-ARP allocation plan.

The City of Spokane is requesting the following changes to its current HOME-ARP allocation plan:

1. Add \$500,000 in Tenant-Based Rental Assistance (TBRA) to the HOME-ARP allocation plan, an activity not previously described in the City of Spokane's HOME-ARP allocation plan.
2. Add a "direct allocation" method of distributing HOME-ARP funds to HOME-ARP TBRA sponsors in the HOME-ARP allocation plan, a funds distribution method not previously described in the City of Spokane's HOME-ARP allocation plan.
3. Decrease funding for the Development of Affordable Rental Housing to \$0.00, a funding change that is greater than 30% of the original funding allocated in the previous HOME-ARP allocation plan.
4. Increase funding to Supportive Services for a total allocated of \$3,434,371.00, a funding change greater than 30% of the original funding allocated in the previous HOME-ARP allocation plan.

Change (as noted above)	Eligible Activity	Funding Amount	New Funding Amount	Method of Distribution
#1 and #2	Tenant Based Rental Assistance (TBRA)	0	\$500,000 (11% of grant)	Direct Allocation
#3	Development of Affordable Rental Housing	\$3,471,504 (75% of grant)	0	
#4	Supportive Services	\$462,867 (10% of grant)	\$3,434,371 (74% of grant)	Competitive RFP
	Administration and Planning	\$694,300 (15% of grant statutory limit)	\$694,300 (15% of grant statutory limit)	
	Total HOME ARP Allocation	\$4,628,671	\$4,628,671	

Consultation:

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

During the initial HOME-ARP consultation process a total of eight (8) presentations were given to member organizations or individuals representing the Continuum of Care, Spokane Housing Authority, homeless service and shelter providers (including the Spokane Homeless Coalition), regional government, affordable housing developers, veterans' affairs, and consultations with domestic violence service providers, fair housing, and human rights agencies, beginning December 2021 through June 2022. Member organizations provided a broader reach and included more interested parties, contributing to good feedback through the HOME ARP survey. Membership lists are attached to this Plan. The lists show that over 100 local agencies, organizations, and jurisdictions were provided information on HOME ARP planning. Included were fire districts, libraries, schools, concerned citizens, DOT, Avista, and many more. An informational web page was developed where interested parties could review every PowerPoint presentation, the CPD notice and guidance, as well as factsheets on HOME ARP. A link to the regional survey, for feedback on development of the HOME ARP Plan, was also located on the informational web page. The survey had good responses from stakeholders and provided insight on the perceptions of the community regarding the best use of funds.

Additional consultations with developers/sponsors of affordable rental housing occurred in November and December 2023. These additional conversations assisted the City of Spokane in identifying the best ways to use HOME-ARP funds to assist the qualifying populations within the boundaries of Spokane.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Regional Continuum of Care Board	WA 502 Continuum of Care for Spokane City/County (membership list attached)	Remote meeting and presentation with follow up of electronic opportunity to comment	The CoC Board was interested to learn about the HOME ARP Plan and future funding opportunities to complete projects that have gaps in funding.
Spokane Homeless Coalition	Membership organization for agencies who serve and house people experiencing homelessness	In person presentation, electronic distribution of HOME ARP survey and documents	Several agencies chose to participate in the online survey to provide input on the potential uses of HOME ARP in Spokane County.

Volunteers of America	Homeless shelter(s), service provider, permanent supportive housing provider	In person, electronic communication, phone conversations	Organization offers shelter and PSH to women, pregnant youths, veterans, chronic singles in the Spokane community through several different locations. Additional funding for homeless services and affordable housing options can always be used.
Catholic Charities of Eastern Washington	Homeless service provider, lead organization for family Coordinated Entry System for Spokane Regional homeless crisis support network.	Electronic meeting to discuss the homeless services and CE System Chart to ensure accuracy	There are CoC funded Singles and Family CE systems in the region. A Youth and Young Adult CE system is currently under development. Right of Way (ROW) CE serving Camp Hope, and The Salvation Army which has CE for the "Way-Out" Shelter operate outside of the CoC systems. All the CE systems identify preferences and use the CoC definition of homelessness.
YWCA	Domestic violence services and shelter provider	Electronic communication, phone conversations, presentation attendee	YWCA support the use of any homeless funds available to serve those at risk and fleeing domestic violence, including youth and young adults.
Spokane County, Veterans Affairs	Eastern Washington Regional Veterans	In person and electronic communication. Remote presentation	Veteran affairs of Spokane County, uses a variety of funding sources to serve Veterans.
Spokane Housing Authority	Public Housing Authority for the geographical area	In person, electronic communication, phone conversations	Continuing need for affordable housing options.
Northwest Fair Housing Alliance	Fair Housing (HUD FHIP)	In person and electronic communication	Fair housing needs of individuals and families who access shelters. Limited ability of shelters to provide modifications. Housing Costs.
Spokane Low Income Housing Consortium	Affordable housing development organization.	In person presentation to the group with electronic communication	Several members of the organization provided feedback on the challenges of funding multi-family housing projects. They began to think about how these

		follow up to those who did not attend in person	funds might be used. They also provided a letter for the record describing a project they believe is appropriate for HOME ARP along with support letter from Empire Health Community Advocacy Fund.
Spokane Regional Governance Council	Local mayors and leadership council	In person presentation, electronic communication, phone conversations.	The region shares concerns about homelessness and the Regional Governance Council discussed the needs of the homeless crisis response system.
Greater Valley Support Network	Concerned representatives from a variety of disciplines and professions addressing the needs of homeless individuals and families Spokane Valley (list of members attached)	Electronic presentation with follow up opportunity to provide feedback with survey or email communication	Participants were anxious to have HOME ARP funds become available due to the many projects underway in the homeless crisis response system that need additional financial support.
Housing and Community Development Advisory Committee	Representatives of Spokane Urban Consortium; 12 cities and towns excluding City of Spokane in Spokane County.	Remote meeting and presentation with follow up of electronic opportunity to comment	As representatives of the Urban County Consortium the HCDAC representatives are supportive of development of HOME ARP Plan to assist with the Spokane Regional Crisis Network
Human Rights Commission	Racial equity and civil rights advocates	In person and electronic communication	Human Rights and Fair housing issues are related. However, there was not a specific concern about racial equity in our shelters. They do a good job of accepting gender identity safety and acceptance. Similarly, BIPOC related issues are isolated issues.
Empire Health Foundation	Lead organization for updating the CE for the Spokane Regional homeless crisis support network	Electronic meeting to discuss work of the organization as it relates to CE	Although administering the ROW CE system, Empire Health foundation may have funds to assist with the other CE lead organization to increase responsiveness to homeless individuals and families

Catholic Charities of Eastern Washington, Catholic Housing Ventures	Housing development division of Catholic Charities of Eastern Washington	In-person meeting to discuss potential new affordable housing projects	HOME ARP funding does not fit with their current development plan which relies heavily on LIHTC.
Inland Empire Residential Resources	Non-profit affordable housing development, and affordable housing property management organization	In-person meeting to discuss potential new affordable housing projects.	Potential new developments would not be able to meet the qualifying populations restrictions.
Spokane Neighborhood Action Partners	Non-profit supportive services organization and affordable housing developer, affordable housing property management organization	In-person meeting to discuss potential new affordable housing projects.	Expressed an interest in exploring HOME-ARP funding for development but didn't have a current project in the queue that could utilize HOME-ARP funding.
Community Frameworks	Non-profit affordable housing development, and affordable housing property management organization	In-person meeting to discuss potential new affordable housing projects.	Projects discussed could potentially meet HOME requirements but not HOME-ARP requirements.

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

The City of Spokane and Spokane County conducted eight presentations in person and electronically to five member organizations and conducted in person consultations with representatives of specific agencies, as required. Follow up for presentations was provided electronically with a link to the HOME ARP Survey. Participants were encouraged to provide feedback within the survey and/or e-mail comments directly to the two HOME ARP Plan developers at the City of Spokane and Spokane County.

While some survey responders did review home ARP guidance and requirements, most survey responses were from people who simply expressed their perception of the Spokane regional homeless crisis network serving Spokane County.

The development of affordable housing units was the highest priority need identified by survey respondents. It is well-known that the City of Spokane lacks adequate affordable housing to address the housing crisis. However, in an open meeting in November 2023, and in subsequent

consultations with affordable housing developer/sponsors, the immediate need for supportive services and tenant-based rental assistance was stressed to address the housing crisis.

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: 1/4/2024***
- ***Public comment period: start date – 1/3/2024 end date – 1/18/2024***
- ***Date(s) of public hearing: 1/3/2024***

- ***Date(s) of public notice: 11/23/2022***
- ***Public comment period: start date – 12/7/2022 end date – 1/6/2023***
- ***Date(s) of public hearing: 12/7/2022***

Describe the public participation process:

Eight City of Spokane and Spokane County joint informational sessions were provided to stakeholder groups, reaching well over 100 businesses, organizations, and agencies. Please see attached lists of those reached through presentations. Citizens were invited to participate in the HOME ARP survey through an informational website, press release to local media outlets, and community presentations.

A public notice invited interested parties to submit comments electronically or in person at a public hearing on December 7, 2022, or during a 30-day comment period beginning December 7, 2022, through January 6, 2023, for the initial HOME-ARP allocation plan.

A public notice invited interested parties to submit comments electronically or in person at a public hearing on January 3, 2024, or during a 15-day comment period beginning January 3, 2024, through January 18, 2024, regarding the substantial amendment to the HOME-ARP allocation plan. The announcement of the public comment period was posted to the website on December 29, 2023, but the Spokesman was unable to post the public announcement until January 4, 2024.

Describe efforts to broaden public participation:

During outreach activities and presentations attendees were encouraged to pass along information and comment opportunities to their friends, families, and colleagues. 162 people participated in the survey. The City of Spokane staff encouraged the CHHS Board to share the information broadly with associated organizations.

The City of Spokane provides ADA accommodations upon request.

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

Recommendations received through the first public participation process favored increasing affordable housing options for the qualifying populations. While service organizations identified a need for additional supportive services, the consensus of non-service providers was that increasing inventory of affordable housing for very low-income households was the first priority.

Recommendations received through the second public participation process, following the first request for proposals for HOME-ARP funding, favored increasing affordable housing options for the qualifying populations, and increasing the stabilization of qualifying households by increasing tenant-based rental assistance and supportive services to qualifying households.

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

All public comments were accepted and reviewed.

During the 30-day public comment period for the proposed HOME-ARP plan, a citizen requested that we consider participating in the CoC's CE. This comment was reviewed, but the plan was not changed to accommodate the recommendation. The Spokane Regional CoC uses the definition of homelessness, those at-risk of homelessness as defined in 24 CFR 578.3. HOME-ARP projects are required to use the definitions as defined in 24 CFR 91.5. Additionally, the CoC's CE system has population prioritization built into it that would not consider all HOME-ARP qualifying populations equally. For these reasons, the City of Spokane did not accept the recommendation of the citizen to use the CoC's CE system for referrals.

During the 15-day public comment period for the proposed substantial amendment to the HOME-ARP allocation plan, CHHS received two public comments. Both citizens wrote about the importance of adding units to the affordable housing inventory. One citizen supported the amendment to reallocate money to supportive services and tenant-based rental assistance but requested that the City of Spokane identify and eliminate roadblocks that deterred developers from applying for HOME-ARP funding, to increase developer interest in the future. The City of Spokane is committed to providing additional technical assistance to sponsors/developers and to expanding funding marketing efforts in future funding rounds.

The second comment was a recommendation that the City of Spokane not provide additional funding for supportive services. This comment was reviewed but the plan was not changed to accommodate the recommendation. The funding gap between supportive services requests and the funding available, community engagement prior to the public comment period expressing support for housing stabilization and supportive services funding, and the increase in the

numbers of households meeting the definitions of the qualifying populations, and the short-term nature of HOME-ARP funding were the primary reasons for not accepting the recommendation.

Needs Assessment and Gaps Analysis:

Table 1 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	299	30	667	25	10								
Transitional Housing	218	74	80	70	22								
Permanent Supportive Housing	197	57	928	928	494								
Other Permanent Housing	724	226	97	97	0								
Sheltered Homeless						87/277	647/651	66	97				
Unsheltered Homeless						3/13	766/806	45	60				
Current Gap										1148	297	318	318

Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation; 4. American Community Survey; 5. Comprehensive Housing Affordability Strategy (CHAS)

* This includes all beds at family shelters - regardless of use at the time of the 2022 HIC that had bed/unit usage for HH without children.

** This includes season beds that were scheduled to end on or after 2/27/2022 and overflow beds.

*** Adults Only Units are estimated as that isn't included in the HIC, only beds are.

**** Total ES count discrepancy is related to 24 beds from Child Only Households

***** Homeless Population is pulled from the PIT Summaries in the HDX. The counts represent Households/Persons.

Table 2 Housing Needs Inventory and Gap Analysis Affordable Units

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	74,380*		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	5,855**	17,950 HH @30% AMI***	12,095
Rental Units Affordable to HH at 50% AMI (Other Populations)	14,430**	14,520 HH @ 50% AMI***	90
Current Gaps			12,185

Data Sources: *American Community Survey 2021 One-year Estimates

**2015-2019 CHAS 5-year average data set tables 14B, 15C

***2015-2019 CHAS ACS Report

Consultation

Table 3 Housing Needs Inventory and Gap Analysis Units with One or More Severe Housing Problems

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		14,465**	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		8,020**	
Current Gaps			22,485

Data Sources: *American Community Survey 2021 One-year Estimates,
 **2015-2019 CHAS ACS Report

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

Homeless as defined in 24 CFR 91.5

The Point-In-Time (PIT) Count conducted in 2023 saw increases in homelessness in Spokane County by roughly 36% overall.

- There were 2,390 people from 2,136 households counted in 2023 compared to the 1,757 people from 1,513 households counted in 2022;
- The sheltered population total was 1,435 in 2023, a 54% over 2022;
- The unsheltered population of 955 in 2023 was 16 % increase over 2022;
- 129 total veterans were counted in 2023, an 86% increase over 2022;

Lack of affordable housing, lack of family or a support network, and substance abuse were the top three reasons identified for homelessness in the 2023 PIT Count. Additionally, 7% of those surveyed in the 2023 PIT Count said eviction was their primary reason for being homeless. Supportive services can assist in providing households with a support network, and referrals to substance abuse services. TBRA can assist households in securing and keeping affordable housing, eliminating some of the evictions that have led to increased homelessness in Spokane as identified by respondent surveyed during the 2023 PIT count.

At Risk of Homelessness as defined in 24 CFR 91.5

Other qualified populations include a subset of the over 14,465 households with at least one severe housing burden who are at 0-30% of the Area Median Income and an additional 8,020 households with at least one severe housing burden making 30-50% of the local AMI as seen in Table 3.

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

When looking at the data for those who report these issues the PIT counted 218 adults in 2023. Twenty-two individuals were living in transitional housing, 118 individuals in emergency shelter and 78 individuals were unsheltered.

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

As seen in Table 2, Spokane currently has a deficit of housing for households with annual incomes less than or equal to 30% local AMI. This means that many extremely low-income households in Spokane are paying more than 30% of their incomes in housing costs. The 2015-2019 CHAS data tables identified more than 6300 households earning less than 30% local AMI, paying more than 50% of their incomes in rent.

Spokane's Veteran population has been a focus of Spokane's local Built for Zero initiative for several years. The City of Spokane's partnership with Spokane United Way has led to decreases in the number of Veteran households experiencing homelessness. However, the percentage of Veterans who return to homelessness within in two years is 30% of inflow each month. The 2023 PIT Count saw an 86% increase in the number of Veterans experiencing homelessness.

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):

According to the 2022 Housing Inventory Count, the City of Spokane has 855 year-round emergency shelter beds, 298 transitional housing beds, and 22 safe haven beds. 615 households were counted for rapid rehousing programs, 347 of whom were families with children as well as some veterans with children (299 families, 48 veterans), and 2,242 units of Supportive Housing.

According to the last conducted Housing Needs Assessment, in Washington State, 118,092 units of subsidized rental housing have been built using state, local, federal, and private capital funds. In addition to these physical units, 40,169 tenant-based rent vouchers are in circulation across the state. Currently, at least 7,303 affordable units are in the development process, but 12,663 of the existing units were at risk of being converted to market-rate housing in 2017 due to expiring affordability agreements.

In addition, a significant unmet need remains for special groups with limited incomes such as seniors, people with physical and cognitive disabilities, families, victims of domestic violence, and the homeless. For extremely low- and very low-income households, Washington State has a deficit of 327,136 affordable and available housing units. In other words, for every 100

extremely low and very low-income households, only 51 units are affordable and available to them. The remaining 49-unit gap represents households in the state who are paying more for housing than they can reasonably afford. Since 2000, incomes in the state have declined by 2.4 percent but median rents have increased 7.8 percent in real dollars. This means that housing affordability in the state has been a growing problem over the past decade.

Locally, the situation mirrors the state. As seen in Table 2, the 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data provided by HUD in September 2022, estimated the **number of affordable housing units** in Spokane County at **5855 units** for Households with incomes at the 30% AMI. The **number of affordable housing units** for Households earning 50% AMI was reported to be **14,430 units**. The number of Households earning less or equal to 30% AMI was reported as 17,950 in the 2015-2019 CHAS report. The number of Households earning 31% - 50% AMI was reported to be 14,520. This represents a gap in affordable housing inventory of at least 12,185 units. This gap in inventory in affordable housing aligns with the feedback received from the community during the public participation meetings.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

When looking at the 2023 Point in Time count the data that was collected for those who experience sheltered and unsheltered homelessness, it was estimated that approx. 2,390 people from 2,136 households experienced homelessness at the time of the count. On the night of the 2023 PIT count, 955 individuals were reported to be living unsheltered, with 1176 counted in shelters along with 259 individuals living in transitional housing programs. This was a dramatic increase over the 2022 PIT count.

Lack of affordable housing was the number one cause for homelessness identified by respondents in the 2023 PIT count.

At Risk of Homelessness as defined in 24 CFR 91.5

Among those who are at risk of homelessness, the Corporation for Supportive Housing estimates Another 17,131 households need supportive housing in Washington each year. This includes individuals who are incarcerated and have behavioral health needs, individuals in nursing homes, developmental centers, psychiatric hospitals, and residential treatment facilities, as well as families and youth involved in the child welfare system due to a lack of safe and affordable housing.

There is an unknown additional number of households who are facing eviction, behind on rent, and not otherwise counted in this data. (Source: 2019 Affordable Housing Update Pursuant to RCW 43.185B.040)

While housing starts are at a 13-year high in fast-growing areas of Washington, affordability remains a problem for most households. In 2019, despite increased permitting activity, housing affordability worsened throughout the state by 10%. For low and extremely low-income households, the situation is worse than ever. Twenty-two percent of Washington renters (234,362 households) are extremely low-income, and there is a deficit of 165,345 units that are both affordable and available to them.

In Washington state, nearly half of renters are cost burdened. Those with extremely low incomes, meaning their household income is 30% or less of the Area Median Income, have the hardest time finding and keeping housing. When housing costs are more affordable and housing opportunities are more readily available, there is a lower likelihood of these households becoming homeless, and households who do become homeless can exit homelessness more quickly and with a greater likelihood of sustaining that housing long-term.

The National Low-Income Housing's most recent state housing needs report notes that there is a shortage of 158,225 housing units available to people at extremely low income. (Retrieved from Washington I National Low Income Housing Coalition {nlihc.org})

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

When looking at the data for those who report these issues the PIT counted 218 adults in 2023. Twenty-two individuals were living in transitional housing, 118 individuals in emergency shelter and 78 individuals were unsheltered.

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

A significant unmet need remains for special groups with limited incomes such as seniors, people with physical and cognitive disabilities, families, victims of domestic violence, and the homeless. For extremely low- and very low-income households, Washington State has a deficit of 327,136 affordable and available housing units. In other words, for every 100 extremely low and very low-income households, only 51 units are affordable and available to them. The remaining 49-unit gap represents households in the state who are paying more for housing than they can reasonably afford. Since 2000, incomes in the state have declined by 2.4 percent but median rents have increased 7.8 percent in real dollars. This means that housing affordability in the state has been a growing problem over the past decade.

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

Existing vulnerabilities compound the effects of poverty and homelessness. Among the unhoused population in the City of Spokane, like other cities, there is a greater proportion of individuals

suffering from substance use disorder (23% compared to 9% in Washington State), domestic violence survivors (10% compared to 1 % in Spokane County), and people with serious mental illness (31 % compared to 4% in Spokane County). While these vulnerabilities are undeniably a piece of the puzzle, they do not explain the rise in homelessness in Spokane. According to a variety of indicators, there have not been major increases in the prevalence of substance abuse or serious mental illness over the years. Where there are increases, they certainly are not on par with the increases in the unhoused population from the 2020 PIT count to the 2023 PIT count. Many of the current shelters operating do not have separate (non-congregate) sleeping quarters for individuals and families to feel safe and secure during a housing crisis. Furthermore, few emergency shelter programs can accommodate all household compositions, pets, and gender identities, and/or operate in a low-barrier, harm-reduction manner.

Below is the breakdown of the reasons given by the unhoused population for why they became homeless. Note that a person could provide more than one reason, so the totals do not sum to the population number.

- 334 reported a Lack of affordable housing,
- 187 reported Substance Abuse,
- 177 reported unemployment/underemployment,
- 174 reported a Lack of Family/support network,
- 167 reported mental health problems,
- 104 reported access to transportation,
- 99 physical disabilities,
- 74 due to covid,
- 60 reported due to Domestic Violence,
- 32 reported due to healthcare costs,
- 21 reported due to criminal history, and
- 16 by choice.

What are the primary reasons why you became homeless?

56% reported a lack of affordable housing, 33% reported Substance abuse, 31 % reported unemployment, 30% reported a lack of support, 29% reported mental health issues, 18% reported transportation access, 17% reported Physical disability issues/concerns, 13% reported COVID related issues, 0% due to DV, and 5% reporting health care costs.

What is missing from the shelter system?

53% reported permanent housing, 44% reported bed space, 44% reported day space, 33% reported transportation, 32% reported Behavioral Health, 27% reported other, 21 % reported Drug or Alcohol Treatment, 18% reported Health Care, 13% reported Employment training services, 12% reported job search, and 7% reported to want Family Reunification Services.

What services are you most in need of?

84% reported Housing, 40% reported Transportation, 36% reported Behavioral Health, 28% reported Drug or Alcohol Treatment, 25% reported Job search support, 21 % reported Health

care, 20% reported Employment training, 15% reported other, and 9% reported Family Reunification Services.

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:

The Housing Needs Assessment was commissioned by the diverse, governor-appointed membership of the Washington State Affordable Housing Advisory Board to create an unbiased accounting of housing affordability in Washington. It is meant to serve as a foundation for current and future policy discussions. In future years this study can be replicated to understand trends and the effectiveness of policy decisions and investments. The data that they have collected shows; Thirty-six percent (936,260) of Washington's households are cost burdened. More than 390,000 households (15.2%) are severely cost-burdened. The proportion of the lowest-earning households (earning less than 30% of the state's median family income) that are severely cost-burdened is greater than those who can reasonably afford their housing. Homelessness is another critical affordability problem one step beyond the cost burden.

HUD's 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data (<https://www.huduser.gov/portal/datasets/cp.html>) reports that 64,730 Spokane County households have at least 1 of 4 severe housing problems. These households lack safe, economically sustainable housing and are at increased risk of housing instability and homelessness.

Therefore, households that spend more than 30% of their income and live-in substandard housing is unstably housed and at risk of homelessness. Substandard housing is defined at 24 CFR § 5.425, which reads:

- (A) When the unit is substandard. (See§ 5.415(a)(2) and (c)(2)(ii) for applicability of this section to the Section 8 Certificate/Voucher, Project-Based Certificate, Moderate Rehabilitation programs and the public housing program.) A unit is substandard if it:
 - (1) Is dilapidated.
 - (2) Does not have operable indoor plumbing.
 - (3) Does not have a usable flush toilet inside the unit for the exclusive use of a family.
 - (4) Does not have a usable bathtub or shower inside the unit for the exclusive use of a family.
 - (5) Does not have electricity or has inadequate or unsafe electrical service.
 - (6) Does not have a safe or adequate source of heat.
 - (7) Should, but not have a kitchen; or
 - (8) Has been declared unfit for habitation by an agency or unit of government.
- (B) Other definitions:
 - (1) Dilapidated unit. A housing unit is dilapidated if:

- a. The unit does not provide safe and adequate shelter, and in its present condition endangers the health, safety, or well-being of a family; or
- b. The unit has one or more critical defects or a combination of intermediate defects in sufficient number or the extent to require considerable repair or rebuilding. The defects may involve original construction, or they may result from continued neglect or lack of repair or from serious damage to the structure.

Identify priority needs for qualifying populations:

The priority needs among the qualifying populations are affordable and supportive housing, as well as appropriate shelters. The proportion of people sleeping in outdoor encampments has more than doubled since 2020. Although proportionally less, there are also more people (numerically) sleeping on the street, under bridges/overpasses, and in vehicles. We may begin to understand something about different unsheltered populations' needs based on their chosen sleeping location and the reason that they don't use a shelter.

For example, those sleeping on the streets were less likely to cite safety or fear of violence as the reason for not using a shelter but more likely than the unsheltered population to cite privacy, rules, hours of operation, and alcohol or drug dependency. Those sleeping in encampments were more like to cite safety/fear of violence and pets as their reason for not using shelters and less likely to cite all other reasons. Finally, those sleeping in a vehicle boat, or RV were more likely to cite safety/fear, privacy, anxiety, pets, and non-traditional family units.

Forty-six percent of respondents cited unemployment or lack of affordable housing as the reason that they are homeless. Forty percent of the population cited affordable housing and 16% cited both. In Spokane, average housing sales and rent have both nearly doubled over the last 10 years. About 10 years ago, Spokane was a very affordable city, and our homeless population was decreasing. In recent years it has become much less affordable with a corresponding rise in our unhoused population. The housing affordability index is calculated using median income and median housing price. When the pricing distribution of the stock of housing for sale does not proportionally match the distributions of household incomes then the affordable housing potential for households at the lower end of incomes are squeezed out of the market.

Since at least 2016, there has been a segment of the population for whom purchasing a house was not affordable. In 2016 this was those making below \$15,000 annual income or about 24,859 households. Recently that segment of the population for which housing ownership is unaffordable has increased to about 86,318 households (making less than \$50,000). Note, for example, in 2020 6% of households had incomes in the lowest segment with only 1 % of housing sales that would have matched those households.

The story is the same with rentals. Housing experts generally site a vacancy rate below 5% as a tight market - the last time the Spokane vacancy rate was above 5% was in 2011. HUD's 2015-

2019 CHAS report listed Spokane's vacancy rate at 1.8%. This rate was further impacted by the impacts of Covid-19 and the eviction moratorium. Additionally, even for those that qualify, HUD specifies a Fair Market Rent value that support organizations cannot exceed. The fair market rent value has diverged from the average rent cost in recent years. In 2021, HUD's fair market rent was \$ 774 but the average cost of a one-bedroom apartment was \$988 in Spokane. If providers cannot find rentals at fair market rates, they cannot spend subsidy dollars.

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:

Annualized data available through the Spokane Regional CoC CMIS data, PIT Count data, Housing Inventory Count data, and the Balance of State HMIS data was presented to stakeholders, advisory boards, and community groups during the consultation process. Stakeholders, community members and advisory groups reviewed the data and confirmed the gaps and needs as presented through the data. Additional reference materials used in identifying priorities for the HOME-ARP plan include: The City of Spokane Housing Action Plan, the Washington State Housing needs assessment, the Community Housing and Human Services Affordable Housing Committee, The Corporation for Supportive Housing, as well as the American Community Survey, and the 2015-2019 HUD Comprehensive Housing Affordability Strategy data sets.

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:

Upon HUD approval of the City of Spokane's Amendment to the HOME-ARP plan, funds will be allocated through a competitive Request for Proposals process for funds allotted to supportive services, and through a direct allocation method to TBRA sponsors.

The CHHS Affordable Housing Committee will assist the City of Spokane in developing the supportive services RFP, the criteria for selecting proposals, and will review the proposals for selection. The competitive supportive services RFP will be publicly posted to websites and the local newspaper. The RFP will also be distributed through stakeholder listservs, and to interested community members. Once the RFP closes, the CHHS Affordable Housing Committee will review the proposals. The selected proposals will be presented to the Community Housing and Human Development Board for review and approval. Following CHHS Board approval, the selected proposals will be presented to the City of Spokane City Council for approval to fund the proposals.

The TBRA direct allocation to TBRA sponsor organizations will be assigned to organizations that either currently administer similar federally funded TBRA programs or successfully administered federally funded, covid-related TBRA previously.

Describe whether the PJ will administer eligible activities directly:

The City of Spokane will provide oversight of sub-recipients and provide monitoring to ensure that funds are spent in accordance with regulations. Sub-recipients will conduct the eligible activities under the HOME-ARP plan.

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:

No funds will be spent prior to HUD's acceptance of the City of Spokane's amendment to the HOME-ARP allocation plan.

Use of HOME-ARP Funding

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

The gaps and needs analysis, public comment gathered during the consultation periods, and public feedback received in response to the HOME-ARP RFP indicate that increasing access to supportive services and affordable housing for qualifying populations are the two top priority needs in Spokane. The substantial amendment to the HOME-ARP allocation plan addresses these needs. Seventy-four percent, or \$3,434,371.00, will be allocated to the funding supportive services in Spokane, and eleven percent, or \$500,000, will go to funding tenant-based rental assistance in Spokane. The remaining fifteen percent is allocated to Planning and Administration.

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 City of Spokane reviewed all the collected data as well as the gap analysis for shelter, affordable and supportive housing, including the investments being focused on by other entitlements, as well as feedback and experience from those working to end homelessness and those who experience homelessness. There are significant needs throughout the City of Spokane for each of the HOME-ARP eligible activities. The lack of short-term and long-term affordable housing and the need for increased supportive services were identified repeatedly in the data,

through community conversations with stakeholders, advisory groups and people with lived experience.

Affordable and supportive housing can help reduce long-term shelter stays, unsheltered homelessness, and provide a safe and affordable place to recover from substance abuse, mental illness, and other disabling conditions. The existing homeless prevention and supportive housing programs are not adequately funded to meet the current and growing needs of the population they continue to serve. Through this substantial amendment, the City of Spokane will utilize the HOME-ARP funds to aid organizations in providing affordable housing through tenant-based rental assistance and supportive services to the qualifying populations.

HOME-ARP Production Housing Goals

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

The City of Spokane has amended its HOME-ARP allocation plan to focus on tenant-based rental assistance and supportive services. The City of Spokane will serve a minimum of 60 households with TBRA.

Supportive services will support approximately 2000 qualifying individuals over the three-year contract term associated with each supportive services grant award. This does not translate into production of units.

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 number one priority need identified in the City of Spokane's 2020 Consolidated Plan is to **improve affordable housing access & availability**.

Through its needs assessment, gap analysis, public feedback and stakeholder input, the City of Spokane further identified that increasing the number of units available to qualifying households is necessary for **improving affordable housing access and availability** in Spokane.

Providing tenant-based rental assistance to 60 qualifying households over 24-months, and supportive services to approximately 2000 qualifying individuals during the three-year contract term for the supportive services grants contributes to the overall housing goals established in the Consolidated Plan.

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 of Spokane will equally prioritize the four 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:

Not applicable.

Referral Methods:

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

Projects will accept applications from all qualifying populations. The intake process will involve initial verification that the applicant is eligible as a qualifying population, placement on a project-based waitlist, and placement into housing in chronological order of application receipt. Verification of eligibility may be needed at time of selection if the initial verification of eligibility has expired.

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):

Not applicable.

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):

Not applicable.

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):

Not applicable.

Limitations in a HOME-ARP rental housing or NCS project

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

The City of Spokane does not intend to limit eligibility for HOME-ARP rental housing to a particular qualifying population.

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

Not applicable.

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

- ***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.***

HOME-ARP funds will not be used for refinancing existing debt.

- ***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.

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

Not applicable.

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

Not applicable.

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

HOME-ARP funds will not be used to refinance any existing debt.

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

Not applicable.

WA 502 Spokane Regional Continuum of Care Board

Sector/Population Representing	Name
Lived Experience Representatives (4)	
Family Representative	Angela Chapman
Single Adult Representative	Dale Briece
Veteran Representative	Jennifer Wilcox
Youth Representative	Pink Varela (they/them)
Homeless Service Providers (3)	
Supportive Services	Jennifer Haynes
Permanent Housing	VACANT
Temporary Housing	Shannon Boniface
City of Spokane (1)	
City of Spokane	Jenn Cerecedes
City of Spokane Valley (1)	
City of Spokane Valley	Arne Woodard
City of Spokane Valley - Alternate	Brandi Peetz
Spokane County (1)	
Spokane County	Cathrene Nichols
Law & Justice Community (1)	
Law & Justice Community	Judge Mary Logan
Behavioral Health & Chemical Dependency (1)	
Behavioral Health/Chemical Dependency	VACANT
Spokane Regional Health District (1)	
Spokane Regional Health District	VACANT
Workforce Development (1)	
Workforce Development	Mark Mattke
DSHS Children's Administration (1)	
Child Welfare	Erik Larson
Public Housing Authority (1)	
Spokane Housing Authority	Arielle Anderson
Veteran's Administration (1)	
Veteran Service Agency	VACANT
Healthcare Provider or Hospital (1)	
Healthcare Provider or Hospital	VACANT
Business Community (1)	
Business Community	VACANT
Landlord Association/Private Landlord	Daniel Klemme
Schools & Education (2)	
K – 12 Education	VACANT

Higher Education	VACANT
Homeless Coalition (1)	
Chair of the Homeless Coalition	Robert Lippman
Philanthropy (1)	
Philanthropy	Morgan Smith
At-Large (2)	
At-Large	VACANT
At-Large	Jason Campbell

Housing and Community Development Advisory Committee

City of Airway Heights - vacant
City of Cheney - vacant
City of Deer Park - Dee Cragun
Town of Fairfield - Cheryl Loeffler
Town of Latah - Yvonne Warren
City of Liberty Lake - Ralph Williams
City of Medical Lake - Chad Pritchard
Town of Millwood - vacant
Town of Rockford - vacant
Town of Spangle - Clyde Sample
City of Spokane Valley - Eric Robinson
City of Spokane Valley - Arne Woodard
City of Spokane Valley - Amanda Tainio
City of Spokane Valley - Tom Hormel
Town of Waverly - Ryan Wilson
At-Large (North) - Tom Richardson
At-Large (North) - Rusty Barnett
At-Large (South) - Mason Burley
At-Large (South) - Michael Mohondro
City of Spokane - vacant

Greater Valley Support Network Membership

Renee Norris, Catholic Charities Rapid Rehousing, renee.norris@cceasternwa.org

Angela Slabaugh, NAOMI angela@naomicommunity.org

Kylie Pybus, WSU Extension Expanded Food and Nutrition Education Program

kylie.pybus@wsu.edu

Aileen Luppert, Spokane County Library District, aluppert@scl.d.rog

Kirsten Fuchs, NEWESD 101/East Valley Community Coalition. kfuchs@esd101.net

Sara Cardwell~NAOMI Abundant Life Director sara@naomicommunity.org

Caesy Morphis, District School Social Worker for Central Valley School District.

Cmorphis@cvsd.org

David Stone, davids@svpart.org

Jessica Erdman, CVSD Student and Family Engagement Center Coordinator,

jerdman@cvsd.org

Sherri Gangitano, Director/Community Coordinator, Spokane Valley Community

Advocates, sv.communityadvocates@gmail.com

Lily Vergine, Communities in Schools Site Coordinator at Opportunity Elementary

lily@ciisspokane.org

Cheney Outreach Center,

East Valley School District,

Pioneer Human services,

Parkview Early Learning Centers,

Nine Mile Falls School District



City of Spokane
Community, Housing & Human Services Department
Housing & Urban Development Entitlement Programs
Citizen Participation Plan



INTRODUCTION

The City of Spokane is designated as an entitlement community by the U.S. Department of Housing and Urban Development (HUD). As such, the Community, Housing, and Human Services (CHHS) Department is responsible for conducting administrative responsibilities related to the Community Development Block Grant (CDBG) Program. Federal regulations mandate entitlement communities develop and adhere to their Citizen Participation Plan when administering CDBG funds ([24 CFR 91.105](#)). This Citizen Participation Plan will be updated when necessary and provide fifteen (15) days' public notice of any changes.

PURPOSE OF THE CITIZEN PARTICIPATION PLAN

The purpose of the City of Spokane's Citizen Participation Plan is to:

1. Provide guidance to the Spokane community to promote and expand citizen participation in the Consolidated Planning process
2. Provide citizens with an avenue for making public comment
3. Support transparent communication between CHHS and the Spokane community

The City of Spokane maintains responsibility for the administration of all documents and activities related to the Consolidated Planning process. This Citizen Participation Plan is intended to outline areas for public input and participation. CHHS is responsible for drafting, presenting to the community, making edits, consideration of public comment, and submission of all Consolidated Planning documents (Consolidated Plan, Assessment of Fair Housing, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report) to HUD.

USE OF THE CITIZEN PARTICIPATION PLAN

CHHS will adhere to the guidance provided in this Citizen Participation Plan. Citizens may submit public comment to any alteration of this plan. CHHS reserves the right to amend and edit this document as necessary. Citizens will be notified whenever this document is amended and given an opportunity to make public comment during a period not less than fifteen (15) calendar days. CHHS will provide a summary of all public comments received relating to amendments of the Citizen Participation Plan.

PROGRAMS INCLUDED IN THE CITIZEN PARTICIPATION PLAN

The Citizen Participation Plan focuses on three separate programs that make up the City of Spokane's Entitlement Program portfolio. The three programs are as follows:

Community Development Block Grant Program ([24 CFR Part 570](#))

The CDBG Entitlement Program provides annual grants on a formula basis to entitled cities and counties which follow HUD's objective to, "Develop viable urban communities by providing decent housing and a

suitable living environment and by expanding economic opportunities, principally for low- and moderate-income persons.” The CDBG Program is authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended; 42 U.S.C.-5301 et seq.

HOME Investment Partnerships Program ([24 CFR Part 92](#))

The HOME Investment Partnerships Program (HOME) provides formula grants to jurisdictions, including the City of Spokane. The City may use HOME funds in partnership with local nonprofit groups or private developers to fund a wide range of activities, including acquisition, building, and/or rehabilitating affordable housing for rent or homeownership, and may provide direct rental assistance to low-income people with tenant based rental assistance (TBRA). HOME is the largest Federal block grant to state and local governments, and it is exclusively designed to create affordable housing for low- and moderate-income households. HOME request for proposals (RFPs) are held separately from CDBG RFPs due to the goals and projects considered under each funding stream. Therefore, public participation for HOME funding may vary from CDBG public participation for their timelines and approval processes.

Emergency Solutions Grants Program ([24 CFR Part 576](#))

Emergency Solutions Grants (ESG) funds may be used to provide a wide range of supportive services under the five program components: Street Outreach, Emergency Shelter, Rapid Rehousing, Homelessness Prevention, and Community Management Information System (CMIS). The public participation process for ESG is governed by the Continuum of Care (COC) Board. For information regarding ESG’s public participation, please contact CHHS and the COC.

CITIZEN PARTICIPATION ENCOURAGEMENT

The City of Spokane is required to adopt a Citizen Participation Plan that sets forth policies and procedures for citizen participation to encourage and inform the public of the process and opportunity to provide input ([24 CFR 91.105\(a\)\(1\)](#)). The CHHS Department is responsible for the creation of a Consolidated Plan, which sets forth goals for five years; Annual Action Plan(s) (AAPs) to carry out the goals of the Consolidated Plan; Consolidated Annual Performance and Evaluation Report(s) (CAPERs); and an Assessment of Fair Housing (AFH), which is a five-year assessment of fair housing statistics affecting the City.

Each document is discussed in greater detail below, including citations of the corresponding federal regulations. Citizens are encouraged to become familiar with these community planning documents and offer comment on ways to strengthen our community impact for low-and moderate-income individuals and families.

Please see the chart in Appendix A for a quick reference on required and optional public processes, and public notice methods for these and other documents used in HUD entitlement programs.

Consolidated Plan ([24 CFR 91.200](#))

The Consolidated Plan is designed to help the City of Spokane assess affordable housing, community development needs, and market conditions to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing

and community development priorities that align and focus on funding from the entitlement programs: CDBG, HOME, and ESG. Several community partners develop strategic plans which will be recognized and considered when the Consolidated Plan is produced. Though these plans may or may not contain CDBG, HOME, or ESG eligible activities, it may be possible to identify where and how entitlement funds may be able to leverage these activities. Examples of plans reviewed include, but are not limited to, Priority Spokane, Spokane's Housing Action Plan, and the 5-Year Strategic Plan to Prevent and End Homelessness.

The CHHS Department will seek participation from local and regional partners related to the goals of HUD's entitlement programs. Participation will be sought from the Regional Health District, City/County Continuum of Care, Spokane County Housing and Community Development, Broadlink PDA, social service providers, the Community Assembly, community centers (including youth and seniors), nonprofit developers, businesses, elected officials, CHHS Board and Committee members, and City departments involved with program implementation.

Annual Action Plan ([24 CFR 91.220](#))

The Consolidated Plan is carried out through Annual Action Plans (AAPs), which provide summaries of the actions, activities, and the specific federal and non-federal resources used each year to address the priority needs and specific goals identified by the Consolidated Plan. The AAP will not provide details on the HOME allocations at the time of publication, due to the timing of each RFP and the extended time needed to establish HOME loan agreements. HOME projects need time to gain other public funds, layering the various funds to accomplish low-income housing projects. Public notice of HOME allocations will be provided annually in January along with preliminary allocations for CDBG funding.

Consolidated Annual Performance and Evaluation Report ([24 CFR 91.520](#))

CHHS reports on accomplishments of each Annual Action Plan to show progress toward the Consolidated Plan's goals in the Consolidated Annual Performance and Evaluation Report (CAPER).

Assessment of Fair Housing ([24 CFR 5.152](#))

The Assessment of Fair Housing (AFH) is designed to improve community planning and overcome fair housing issues. The AFH process begins with inclusive community participation and results in the establishment of fair housing goals to increase fair housing choice and provide equal access and opportunity for all community members. Fair housing barriers will be considered while developing the Consolidated Plan.

Citizen Participation Plan ([24 CFR 91.105](#))

The Citizen Participation Plan (CPP) sets forth the policies and procedures for citizen participation throughout the Consolidated Planning process. The CPP must facilitate citizen participation during initial development of the Consolidated Plan, define and explain the substantial amendment process, and provide comment opportunities. CPP regulations require, and CHHS desires, to have active citizen participation, with a special emphasis on participation from the following populations:

- Low- and moderate-income persons
- Residents of slums, blighted areas, and predominately low- and moderate-income areas

- Non-English-speaking persons
- Persons with disabilities
- Public housing residents

Program Year Cycle

The CHHS Program Year runs from July 1 to June 30 each year. In late summer, CHHS publishes a Request for Proposals (RFP) of CDBG funds. This notice includes the amount of funding the City of Spokane expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit low- and moderate-income populations. A similar process begins in spring with the HOME RFP.

After an RFP is released, CHHS will schedule applicant workshops for applicants who may apply for CDBG and HOME funds. Applicant workshops will provide an overview of program objectives, eligible activities, eligible applicants, funding policies, and application procedures. Proposal evaluation and selection criteria are also discussed. Following the applicant workshops, CHHS staff will be available to provide individualized technical assistance upon request.

For detailed information on the CHHS Program Year cycle, including funding priorities, anticipated funds available, and the RFP application process, please reference the most recent CDBG Funding Policies & Procedures, which are updated annually, and posted on the CHHS Funding Opportunities webpage: <https://my.spokanecity.org/chhs/funding-opportunities/chhs/>.

DEVELOPMENT OF THE CONSOLIDATED PLAN AND ASSESSMENT OF FAIR HOUSING

Citizens are encouraged to actively engage in the development of each Consolidated Plan and Assessment of Fair Housing plan. Both plans are intended to guide current and future efforts to benefit the Spokane community. Participation is not limited to any one group or organization. All citizens have the opportunity to provide meaningful feedback that leads to plans inclusive of all Spokane residents. A thirty (30) day public comment period and a public hearing are required for the Consolidated Plan and the Assessment of Fair Housing.

Data for Public Review and Comment

CHHS will make information available when developing the Consolidated Plan and Assessment of Fair Housing plan. Citizens will have an opportunity to review the plans via the CHHS website (<https://my.spokanecity.org/chhs/>). Citizens will also have opportunities to comment prior to adoption of the Consolidated Plan and AFH by attending CHHS Board and other related meetings.

CHHS will publish a Request for Proposals (RFP) to identify priority projects/activities that successfully carry out high priority community needs and goals of the Consolidated Plan. The RFP will include information related to annual funding priorities as they relate to Consolidated Plan goals; the amount of funds available to benefit low- and moderate-income individuals; and eligible activities for the Program Year. All CHHS funded projects and activities for CDBG, HOME, and ESG must comply with the Uniform

Relocation Assistance and Real Property Acquisition for Federal and Federally-Assisted Programs (as outlined in [49 CFR Part 24](#)).

Publishing the Consolidated Plan and Assessment of Fair Housing

CHHS will make available draft copies of the Consolidated Plan and AFH on the City's website for review and comment prior to adoption by the City Council. Citizens are encouraged to participate in public outreach efforts and provide public comment related to each draft plan. Public notice will be provided in the local newspaper legal ads. Other types of public notice may include the City newsletter, CHHS website, and communication with 29 neighborhood councils through the Community Assembly. Hard copies will be made available upon request. Citizens requesting hard copies may retrieve their documents by reserving a time with staff and visiting Spokane City Hall.

CONSOLIDATED ANNUAL PERFORMANCE AND EVALUATION REPORT

CHHS will seek public comment as part of the Consolidated Annual Performance and Evaluation Report (CAPER). Citizens are encouraged to review the CAPER and evaluate progress toward achieving the goals identified in the Consolidated Plan. Interested citizens are encouraged to attend the CHHS Board Public Hearing. Staff will present accomplishments and areas for improvement during the public hearing.

Citizens will have fifteen (15) calendar days to review the CAPER and submit public comment for inclusion in the CAPER. CHHS will consider all public comments and summarize them in the report. CHHS will accept public comment in-person, via email (spokanechhs@spokanecity.org), or phone (509-625-6325).

SUBSTANTIAL AMENDMENTS TO PRIOR YEARS' PLANS

CHHS may, on occasion, be required to substantially amend the Consolidated Plan or an Annual Action Plan which has already been adopted by City Council and accepted by HUD. CHHS will notify the public of substantial amendments to prior years' plans, as required by HUD. Substantial amendments may be the result of HUD direction for special funding, the cancellation of a project already approved in an Annual Action Plan, and/or a funding change greater than 30% of the original award. Consolidated Plan amendments are a result of amendment requests by the community to adjust priorities to accommodate community needs not previously identified in the Consolidated Plan. Amendments to the Consolidated Plan may be submitted for consideration during any public comment period or via email to spokanechhs@spokanecity.org.

PUBLIC MEETINGS

Citizens are encouraged to attend CHHS Board meetings held on the first Wednesday of every month from 4:00-6:00 pm. Meetings are held at Spokane City Hall in the City Council Briefing Center; virtual/hybrid options are available. Public comment is allowed on items relevant to the CHHS Board during the first ten (10) minutes of each meeting. The CHHS Board welcomes comments on CHHS planning documents and reports, as well as HUD entitlement processes and procedures.

PUBLIC HEARINGS

CHHS will host no less than two (2) Public Hearings with the CHHS Board during each calendar year. The CHHS Board will host Public Hearings which allow for formal public comment periods. Public Hearings will be held for Consolidated Plans, Assessments of Fair Housing, Annual Action Plans, substantial amendments to prior years' plans, Consolidated Annual Performance and Evaluation Reports, and special funding allocations.

Citizens also have the opportunity to provide public comment at the City Council meeting where each Consolidated Plan, Annual Action Plan, and Assessment of Fair Housing is briefed. Citizens will have an opportunity to provide public comment during the initial briefing and again prior to the final City Council vote. CHHS will take all public comments offered to City Council into consideration.

CHHS will publish a notice announcing every comment period and public hearing according to this Citizen Participation Plan. CHHS will accept all public comments and summarize them in the plans. Please refer to Appendix A for specific details.

ACCESS TO RECORDS AND TECHNICAL ASSISTANCE

CHHS will make electronic and print copies of the Consolidated Plan, Assessment of Fair Housing, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report available to the public for review and comment on its website: <https://my.spokanecity.org/chhs/documents/>. Individuals may request a print copy of a document(s) by submitting a formal request to CHHS in writing, via email, in person, or via phone call:

City of Spokane Community, Housing, and Human Services Department (CHHS)

6th Floor, Spokane City Hall

808 W. Spokane Falls Blvd

Spokane, WA 99201

(509) 625-6325

spokanechhs@spokanecity.org

Hours: M-F, 8:00 AM to 5:00 PM

<https://my.spokanecity.org/chhs/>

Citizens may make a formal public records request to CHHS or the City of Spokane at any time. The City of Spokane has a formal policy ([ADMIN 0260-10-03](#)) for making a public records request. Individuals wishing to make a formal public records request are encouraged to visit the City of Spokane webpage (<https://my.spokanecity.org/administrative/public-records/>) for specific information and instructions. Individuals may also contact the City Clerk's office for additional information regarding access to public records:

Office of the City Clerk

5th Floor, City Hall

808 W. Spokane Falls Blvd.

Spokane, WA 99201

(509) 625-6350

clerks@spokanecity.org

Hours: M-F, 8:00 AM to 5:00 PM

<https://my.spokanecity.org/administrative/public-records/>

CHHS offers opportunities for technical assistance to all agencies and individuals, upon request. CHHS works with partner agencies and the CHHS Board to ensure basic program requirements are understood. Parties wishing to meet with CHHS staff to review planning documents or become more familiar with program requirements are encouraged to contact CHHS and request technical assistance.

Technical assistance includes:

- Program rules and regulations
- Requirements for implementing and managing projects
- Project eligibility and national objectives requirements
- Understanding CHHS Department planning documents

Please request technical assistance by contacting the CHHS Department using the information above.

ACCESSIBILITY

The City of Spokane is committed to providing equal access to its facilities, programs, and services for persons with disabilities. The Council Briefing Center in the lower level of Spokane City Hall, 808 W. Spokane Falls Blvd, is wheelchair accessible and equipped with an infrared assistive listening system for persons with hearing loss. Headsets may be checked out (upon presentation of picture I.D.) at the City Cable 5 Production Booth located on the first floor of City Hall, or through the meeting organizer.

Individuals requesting reasonable accommodations or further information should contact Risk Management via phone (509-625-6221), mail (808 W. Spokane Falls Blvd, Spokane, WA, 99201), or email (mlovmaster@spokanecity.org). Persons who are deaf or hard of hearing may contact Risk Management through the Washington Relay Service at 7-1-1. Please contact the City forty-eight (48) hours before the meeting date.

COMPLAINT PROCEDURE

Complaints from the public regarding entitlement programs or the Consolidated Planning process must be submitted in writing to the CHHS Department:

City of Spokane Community, Housing, and Human Services Department (CHHS)

6th Floor, Spokane City Hall

808 W. Spokane Falls Blvd

Spokane, WA 99201

spokanechhs@spokanecity.org (please put "Complaint" in subject line)

The CHHS Department, where applicable and practical, will respond to a written complaint within 15 working days of its receipt.

CONTACT INFORMATION

Citizens are encouraged to offer public comments at any time by contacting the CHHS Department via email (spokanechhs@spokanecity.org) or phone (509-625-6325).

Citizens are also encouraged to attend CHHS Board meetings held on the first Wednesday of every month from 4:00-6:00 pm. Meetings are held at Spokane City Hall in the City Council Briefing Center; virtual/hybrid options are available. Public comment is allowed on items relevant to the CHHS Board during the first ten (10) minutes of each meeting.

DRAFT

APPENDIX A: CHHS DOCUMENTS AND REPORTING – LEVELS OF APPROVAL

CHHS Documents and Reporting	Legal Ads – Public Notice Required	Optional Public Notice Methods	Minimum Comment Period	CHHS Board Public Hearing	City Council Committee	City Council Briefing Session	City Council Legislative Session
Consolidated Plan & Annual Action Plans	YES	Website City newsletter Social media	30 calendar days (N/A in emergencies as defined by HUD)	YES	YES	YES	YES
Assessment of Fair Housing	YES	Website City newsletter Social media	15 calendar days	YES	YES	YES	YES
Substantial Amendment(s) to Prior Years' Plans	YES	Website City newsletter Social media	30 calendar days (N/A in emergencies as defined by HUD)	YES	NO	NO	NO
Amendment(s) to Consolidated Plan Priorities	YES	Website City newsletter Social media	30 calendar days (N/A in emergencies as defined by HUD)	YES	NO	NO	NO
Funding Policies & RFP	NO	Website City newsletter Social media	15 calendar days	YES	NO	NO	NO
Citizen Participation Plan	NO	Website City newsletter Social media	15 calendar days	YES	NO	NO	NO
Consolidated Annual Performance & Evaluation Report (CAPER)	NO	Website City newsletter Social media	15 calendar days	YES	NO	NO	NO

CA/CD Committee Comment on the Citizen Participation Plan

The following text represents the viewpoint of the CA/CD Committee, a standing committee of the Community Assembly, but does not represent the viewpoint of the entire CA, chiefly because the deadline for comments occurs before the next CA meeting.

We have reviewed the Draft of the 2024 Citizen Participation (CPP) and find it deficient in only one important area, namely how a project can get funded. We have attached below a 2020 copy of the CPP from Clark County, Washington and call your attention to items 5, 6 and 7 which we feel is a good template for adding this important component.

Thank you for your attention.



COMMUNITY DEVELOPMENT BLOCK GRANT AND HOME INVESTMENT PARTNERSHIPS PROGRAM

CITIZEN PARTICIPATION PLAN

1. Overview

Clark County annually receives Community Development Block Grant (CDBG) and HOME Investment Partnerships Program (HOME) funds from the U.S. Department of Housing and Community Development (HUD) which it administers through the county's Department of Community Services. The primary purpose of CDBG is to develop viable communities through the provision of decent housing, a suitable living environment and expanding economic opportunities for low- and moderate-income persons. HOME funds provide a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to people who are low-income.

As a recipient of these funds, the County is required to produce the following documents:

- Consolidated Plan – a five-year plan that documents the housing and community development needs, outlines strategies to address those needs, and identifies proposed program accomplishments and an Annual Action Plan that describes specific CDBG and HOME-funded projects that will be undertaken over the course of the upcoming program year; and
- Consolidated Annual Performance and Evaluation Report (CAPER) – evaluates the use of CDBG and HOME funds from the previous program year.

This Citizen Participation Plan has been developed to provide citizens and other interested parties opportunities to participate in an advisory role in the planning, implementation and evaluation of the CDBG and HOME programs and to review and comment on the documents listed above.

2. Citizen Participation

The Citizen Participation Plan outlines the County's responsibility for providing opportunities for active citizen participation. The goals of the Citizen Participation Plan are to:

- Encourage citizen participation by all residents, emphasizing involvement of low- and moderate-income residents, people with disabilities, minorities and residents of assisted housing;
- Inform citizens of the Consolidated Plan and the Annual Action Plan, including funds available from CDBG, HOME and other Homeless Programs and eligible activities under these programs;
- Give all citizens an opportunity to identify and respond to priority needs;

- Give all citizens an opportunity to identify and respond to proposed projects and the use of funds; and
- Give all citizens an opportunity to review and comment on program performance.

The County shall follow a citizen participation plan that addresses the following issues: participation, access to meetings, access to information, access to records, publishing the plan, public hearings, notice of hearings, public comments, technical assistance, complaints, and amendments.

a) Encouragement of Citizen Participation in CDBG/HOME Planning and Activities: All citizens, including low- and moderate-income persons, persons living in low- and moderate-income neighborhoods, minority populations, non-English speaking persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons/agencies and residents of public and assisted housing developments are encouraged to participate in the development and review of the:

- Consolidated Plan: Five-Year Plan and Annual One-Year Action Plan;
- Substantial Amendments to the One-Year Action Plan or Five-Year Plan;
- Citizen Participation Plan; and
- Consolidated Annual Performance and Evaluation Report (CAPER)

All meetings are open to the public and are scheduled at times and locations convenient to potential and actual beneficiaries with accommodations for persons with disabilities and oral language assistance (interpretation) for non-English speaking persons. Those wishing to be regularly informed of meetings/activities can be added to the program mailing and e-mail lists. All of the documents referenced above will be available for review and public input through the following means:

- Posted to the Clark County CDBG/HOME web page: www.clark.wa.gov/cdbg;
- Social media messages including Clark County's Facebook page and Twitter account: @ClarkCoWA;
- Provided to interested parties through email distribution lists;
- Available for review at the Clark County CDBG/HOME Program offices at 1601 E. Fourth Plain Boulevard, Building 17, Vancouver, WA 98660;
- Mailed to interested parties upon request; and
- Provided at public hearings.

b) Public Hearings, Document Availability and Comment Periods: Public hearings will be held for the approval of, or amendments to, the Consolidated Plan and CAPER. The public hearing notice shall include a summary of the contents and purpose of the documents, and shall include a list of the locations where copies of the proposed document may be examined. During the public comment period, copies of the proposed documents will be made available as described above and reasonable accommodations will be made for non-English speaking persons and for people with disabilities.

The public may comment on any proposed documents in writing or at the public hearing. Written comments must be directed to the CDBG/HOME Program Manager, Clark County CDBG Program, Department of Community Services, PO Box 5000, Vancouver, WA 98666-5000 or pete.munroe@clark.wa.gov. Clark County shall consider any comments received in preparing these documents.

Public Hearing Location: The public hearing shall be held in the Clark County Councilors Hearing Room, Sixth Floor, Public Service Center, 1300 Franklin, Vancouver, WA.

c) Final Policy/Implementational Authority: The program recognizes that as the elected governing body of Clark County, the Board of County Councilors has the ultimate responsibility and authority for the implementation of the Consolidated Plan and CDBG and HOME activities and documents.

3. Public Hearing Notice and Corresponding Public Comment Period Requirements

Notices of public meetings, public hearings, substantial amendments, notifications of comment periods, and the notification of Clark County's proposed and actual use of CDBG/HOME funds will be put on the Clark County CDBG/HOME web page: www.clark.wa.gov/cdbg.

Citizens, organizations, agencies and other interested parties will be encouraged to submit their comments on the proposed Consolidated Plan, Annual Action Plan and CAPER. All comment periods will begin the day notice is posted. Minimum comment periods are listed below:

Document	Comment Period
Citizen Participation Plan	15 calendar days
Consolidated Plan input (Five Year and One Year Plans)	30 calendar days
CAPER	15 calendar days
Substantial Amendment	30 calendar days

Clark County will consider all comments in preparing its Consolidated Plan, Annual Action Plan and CAPER for submission to HUD, and will include a summary of all comments received and the actions taken to address each comment.

To further encourage the attendance and participation of persons of low- and moderate-income, notices will also be sent to:

- Vancouver Housing Authority;
- Clark County Community Action Program;
- Continuum of Care;
- agencies that provide housing, health, and social services including those that provide services to children, elderly, disabled, people living with HIV/AIDS, and those who are homeless;
- agencies that represent minorities residing in Clark County;
- other interested parties on the Clark County HOME/CDBG mailing list.

4. Access to Records

Clark County shall provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and the County's use of assistance under the CDBG and HOME Programs during the preceding five years.

Copies of the adopted consolidated plan, adopted substantial amendments, and adopted performance reports, as well as information regarding use of funds and other program information will be maintained by the County's CDBG and HOME program staff.

The public may access these materials by contacting the Program Manager, Clark County CDBG Program, Department of Community Services, PO Box 5000, Vancouver, WA 98666, voice (360) 397-2130, Relay 711, 8:00 a.m. to 5:00 p.m., Monday through Friday. Reasonable accommodation for persons with disabilities will be made upon request. The CDBG and HOME Program web page address is: www.clark.wa.gov/cdbg/

5. Program Year and Funding Availability

The Clark County Program Year runs from July 1 to June 30 each year. Early in October, Clark County publishes a Notice of Availability of CDBG and HOME funds. Through this notice, Clark County will make available to citizens, public agencies, and other interested parties information that includes the amount of funding Clark County expects to receive (including grant funds and program income) and the range of activities that may be undertaken, including the estimated amount that will benefit persons of low- and moderate-income. The Notice will also inform the public of the time and place of the CDBG and HOME workshops described more fully in Section 6 of this Plan.

6. Program Year Schedule

July 1	Start of program year
September	Public Hearing to hear input on Consolidated Plan (Action Plan) prior to publication Public Hearing regarding performance of previous year's activities: CAPER (15-day comment period prior to submission) CAPER submitted to HUD
October	Notice of Availability of CDBG/HOME Funds Annual applications available for CDBG and HOME funds Pre-submittal meeting/technical assistance for CDBG and HOME
December	CDBG and HOME applications due
March	CDBG and HOME projects selected by UCPB for funding
April	Public Hearing on Action Plan/Consolidated Plan (30-day comment period following hearing)
May	Action Plan submitted to HUD
June 30	End of program year

7. Competitive Fund Allocation Process

Clark County receives annual allocations of CDBG and HOME funds. After funding awards are made, any funds returned from projects, either completed under budget or cancelled, are used for projects not awarded their full request due to lack of funds. If additional funds remain, they are reallocated in the next program year funding cycle.

The County utilizes separate competitive fund allocation processes to recommend HOME and CDBG projects for funding to the Board of County Councilors. The public is notified about the availability of the funding applications in the same way documents for review are advertised. Notice of funding availability is also emailed to cities, nonprofits, and past recipients. The process also includes an application workshop and technical assistance.

- a) CDBG and HOME Funding Workshops: When the Notice of Availability of CDBG and HOME funds is released, workshops for CDBG and HOME applications are also advertised. Workshops are conducted to assist applicants who may apply to Clark County for CDBG or HOME funds. At the workshops, program objectives, eligible activities, eligible applicants, funding policies, application forms and the proposal evaluation and selection process are discussed. Department

staff will also meet with applicants individually (upon request), to discuss proposal development and to provide assistance. Each workshop participant receives a copy of the annual Request for Proposals, Proposal Forms and Instructions, and the County's CDBG and HOME Funding Policies. The locations of the workshops are accessible.

- b) City Community Development Meetings: Each city, before it may submit its CDBG and/or HOME application, must hold a public meeting to inform the residents about program objectives, eligible activities, and to solicit public comment on local needs. Proposed projects must be consistent with the Consolidated Plan and local plans and community strategies. Nonprofit agencies proposing projects in specific cities must provide information about their project to the city at a regularly scheduled city meeting before their application is submitted to the county. Each city or town must document their citizen involvement processes and provide the documentation with their funding application.
- c) Project Selection: The Urban County Policy Board (UCPB) selects CDBG and HOME projects based on a numerical scoring system. The UCPB consists of the mayors of all cities and towns in the county, except the City of Vancouver, or their designee and is chaired by a county councilor. The projects selected are recommended to the Board of County Councilors for final approval and submission to HUD. UCPB meetings are regularly scheduled for the second Monday of the month in the Public Service Center located at 1300 Franklin, 6th Floor, Room #679, Vancouver, WA. The meeting is scheduled from 8:30 to 10:00 a.m.

8. Program Performance Review

A public hearing is held in late September by the Board of County Councilors to collect public input on the County's performance during the last program year. The Consolidated Annual Performance Evaluation Report (CAPER) analyzes progress towards the goals established in previous plans with regard to the unit of measure for the project, as well as timely completion. This report also provides information on the performance of funded projects in relationship to the program objectives. The public hearing and comment notice will be at least 15 days before the date of the hearing. The CAPER will be made available for public review and Clark County shall consider any comments or views received. A summary of all comments or views, and a summary of any comments or views not accepted and the reasons therefore, shall be attached to the final CAPER.

9. Non-English Speaking and Handicapped Residents

Public Hearing/Meeting Accommodation

All public meetings, workshops, and hearings are held in facilities that are accessible to people with disabilities. Upon reasonable request, the County will provide translators at public hearings and meetings. Telephonic oral language service (interpretation) is also available. Meeting notices will be sent to organizations representing non-English speaking residents of Clark County.

CDBG/HOME Document and Materials Review Accommodations

Reasonable accommodations will be provided to disabled persons, or non-English speaking persons needing assistance in reviewing CDBG/HOME program materials or documents.



For other formats, contact the Clark County ADA Office: **Voice** (360) 397-2000; **Relay 711** or (800) 833-6388; **Fax** (360) 397-6165; **E-mail** ADA@clark.wa.gov.

10. Technical Assistance

Clark County will provide technical assistance to groups that request such assistance to develop an application to the County or HUD. Such technical assistance may include an explanation of:

- a) Program rules and regulations;
- b) Requirements for implementing and managing projects;
- c) Project eligibility and national objectives requirements; and
- d) The evaluation process used by the Urban County Policy Board in recommending projects to the County Board of Councilors.

The County's provision of technical assistance does not include the preparation of grant applications for individuals or organizations and is limited by funds and staff availability.

11. Procedures for Complaints or Grievances

Complaints, inquiries, and grievances shall be submitted in writing to the Program Manager, Clark County CDBG/HOME Program, Department of Community Services, P.O. Box 5000, Vancouver, WA 98668-5000. A written response shall be provided to the complaining or aggrieved party within 15 working days of the date of receipt of the written complaint or grievance.

12. Criteria and Procedures for Amendments and Substantial Amendments to Action Plans and/or the Five Year Consolidated Plan

A "substantial amendment" is an amendment to the Consolidated Plan/Annual Action Plan that requires 30 days of public comment. Prior to submitting substantial amendments to HUD, Clark County will provide citizens with a 30-day notice of an opportunity to comment whenever a substantial amendment is being proposed. Clark County shall consider any comments received in preparing substantial amendments. A summary of all comments received shall be attached to any substantial amendment of the plan. Any comments that are not accepted shall be included in this summary along with the reason they were not accepted.

A substantial amendment is defined, in accordance with 24 CFR 91.505(a), as:

- a) A change in allocation priorities (any change greater than 30 percent in an individual project budget) or a change in the method of distribution of funds;
- b) Carrying out an activity (including those funded exclusively with program income) not previously described in the Consolidated Plan or Annual Action Plan; or
- c) A change in the purpose, scope, location or beneficiaries of an activity.

Changes that are not considered substantial amendments:

- a) Changes to the CDBG or HOME budget for a project by an amount that is less than 30 percent;
- b) Consolidated Plan data updates such as census data, income limits, fair market rents, HOME high and low rent limits, HOME subsidy limits, and similar types of data;
- c) A minor change in location as long as the purpose, scope, and intended beneficiaries remain essentially the same; or
- d) The transfer of funds within a project from one approved budget line item to another approved budget line item (e.g., construction rather than engineering).

13. Minimizing Displacement

Consistent with the goals and objectives of activities assisted under the Housing and Community Development Act, the Clark County CDBG and HOME Programs will take the following steps to minimize displacement of people, businesses, nonprofits, and/or farms:

- a) Discourage projects involving displacement/relocation through a grant application scoring system that reduces the total score of projects that anticipate displacement/relocation;
- b) Encourage project sponsors to plan or stage projects to minimize and/or prevent the adverse impacts of displacement;
- c) Provide for the establishment of temporary relocation facilities in order to provide housing to households whose displacement will be temporary;
- d) Provide advisory services which will include such measures, facilities, and services as may be necessary to determine relocation needs, or other assistance for which displaced persons may be eligible;
- e) Coordinate code enforcement with rehabilitation and housing assistance programs;
- f) Stage the rehabilitation of apartment units to allow tenants to remain in the building/complex during and after rehabilitation by working with empty units or buildings first; and
- g) Replace housing units one for one, which meet the requirements of Section 104(d) of the Housing and Community Development Act of 1974 (24 CFR 42.375).

Any residential tenant who will be permanently and involuntarily displaced shall be entitled to the following services and benefits:

- a) Timely Information. The tenant will be contacted and provided timely information that fully explains the reason for the displacement and the relocation assistance available;
- b) Advisory Services. The tenant will be provided appropriate advisory services necessary to minimize hardships in adjusting to the relocation;
- c) Advance Notice. Unless there is an urgent need for the property (e.g., substantial danger to a person's health or safety) or the tenant is evicted for cause, the tenant shall be given at least 90 days' advance notice of the earliest possible date which they must vacate the property;
- d) Replacement Housing Assistance. Replacement housing assistance is available to both renters and owners in the form of rental assistance or purchase assistance. The replacement assistance is based on a number of factors as provided in the Uniform Relocation Act and its regulations at 24 CFR Part 24; and,
- e) Moving Expenses. The tenant will be reimbursed for reasonable, documented costs of his/her moving and related expenses, or the tenant may elect to receive a fixed payment for moving and related expenses.

14. Contingency Plan in the Event of an Emergency or Disaster

In the event of an emergency or disaster that presents a serious and immediate threat to the health and welfare of our citizens, the noticing requirements for public comment on plans or amendments may be reduced to five calendar days, or as required by state and federal guidelines. Any reprogramming of funds in the event of such an emergency will require review by the Urban County Policy Board. Documents may not be available for review in-person, but will otherwise be made available.

October 3, 2002
 Adopted by the Board of County Commissioners November 26, 2002
 UCPB meeting location change, April 15, 2003
 CHRB meeting location change, September 15, 2004
 Applications no longer available via website, September 15, 2004
 New Department of Community Service location, February 2, 2007
 Disbanded HOME Consortium, July, 1, 2009
 Updates throughout plan, October 11, 2011
 Updates through plan, August 21, 2015
 Contingency in the event of disaster, April 20, 2020

Jilot, Tessa

From: Jilot, Tessa
Sent: Monday, January 22, 2024 11:51 AM
To: Andy Hoye
Subject: RE: Comment on the 2024 Citizen Participation Plan

Good Morning Andy,

Thank you for taking the time to submit your thoughtful comments on the draft 2024 Citizen Participation Plan (CPP). This feedback is extremely valuable, and my goal with this email is to address the concerns outlined in your comment letter.

The purpose of the Citizen Participation Plan is three-fold:

1. Provide guidance to the Spokane community to promote and expand citizen participation in the Consolidated Planning process
2. Provide citizens with an avenue for making public comment
3. Support transparent communication between CHHS and the Spokane community

I believe your feedback can help us expand citizen participation in the Consolidation Planning process and support transparent communication between CHHS and the Spokane community. I reviewed the Clark County, WA CPP you attached with your comments and paid particular attention to Sections 5, 6, and 7. Section 5 explains the Program Year and how Notices of Funding Availability are shared with the community. Section 6 provides an overview of the Program Year schedule. I believe this information can be incorporated into the City of Spokane's CPP and hope it will provide an additional level of transparency in how we receive and distribute HUD funding. This information can also help the Community Assembly prepare for RFP cycles.

Section 7 provides an overview of the funding allocation process. The information from the Clark County document is quite robust, as it provides guidance for a broader geographic area and includes an extensive review process. It may be possible to incorporate similar information in the City of Spokane's CPP by explaining the role of the Affordable Housing and RFP Committees in the distribution of funds.

I know you submitted your comments separate from the Community Assembly, but that a primary goal is to increase transparency so the Community Assembly can be more active in the RFP process. It is hard to adequately capture information about the RFP process in the Citizen Participation Plan, as the CPP is focused on community engagement from a fairly broad, general level. If you, or an organization with which you are affiliated, wish to apply for HUD funds during an RFP cycle, I highly encourage you to attend an Applicant Workshop to learn about funding opportunities, and to request technical assistance as questions arise during the application process. Please let me know if you, or other members of the Community Assembly, would like to be added to our RFP distribution list in order to receive timely information about upcoming workshops and funding opportunities.

I hope I have adequately addressed your comments. Please let me know if you have additional input to share, or if you have questions. I am happy to chat with you further about the CPP, and my contact information is listed below if you want to reach out.

Take care,

Tessa

TESSA JILOT | CITY OF SPOKANE | PROGRAM PROFESSIONAL, COMMUNITY, HOUSING & HUMAN SERVICES
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Emails and attachments sent to or from the City, including personal information, are presumptively public records that are subject to disclosure. - Chapter 42.56 RCW



**NOTICE OF COMMENT PERIOD
AND
NOTICE OF PUBLIC HEARING**

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

- **Community Development Block Grant program administration**
- **2020-2024 Consolidated Plan amendment requests**
- **2024 Proposed Annual Action Plan with funding recommendations**
- **Substantial Amendments to Prior Years' Action Plans**

The CHHS Department and CHHS Board are seeking comments on the City of Spokane, Community Development Block Grant (CDBG) Program; Program Administration, Consolidated Plan Amendments, 2024 funding recommendations, and substantial amendments to prior year's plans. The City of Spokane Community Housing and Human Services Board is requesting public comments. The comment period will begin on February 7, 2024, at the regularly scheduled CHHS Board meeting, and will hold a Public Hearing at the March 6, 2024 CHHS Board meeting. Comments will be accepted through March 9, 2024. A motion to accept the proposed 2024 Annual Action Plan and allocation recommendations will be accomplished at the April 6, 2024 CHHS Board meeting.

Interested parties are invited comment in writing to the CHHS Department via email to Spokanechhs@spokanecity.org or by phone at **509.625.6325**, and/or attend and speak at the Public Hearing on March 6, 2024 at 4 PM. The CHHS Board meets the first Wednesday of each month at 4 PM in the Council Briefing Room; lower level of Spokane City Hall. Meetings are hybrid. To attend please contact kclifton@spokanecity.org and request a meeting invitation. Please allow 24 hours to gain an invitation.

2024 Annual Action Plan Funding Recommendations:

Public Service Activities

CHAS	\$75,000
West Central Community Center	\$35,000
YWCA	\$58,935
Northeast Youth Center	\$55,541
Women and Childrens' Free Restaurant	\$65,000
Partners with Families and Children	\$86,574
Our Place	\$70,402
Lutheran Community Services Northwest	\$84,515

Housing Activities

SNAP Single Family Rehabilitation	\$1,624,021*
*includes revolving loan fund balance of \$700,000	
SNAP Minor Home Repairs	\$ 500,000

Micro Enterprise Activities

Sin Miedo Al Exito	\$ 66,181
SNAP Financial Access	\$150,000

Public Facility Improvement Projects

Northeast Community Center	\$120,000
The Salvation Army	\$456,000
Family Promise	\$ 51,921
Saint Margaret's Shelter	\$102,943
Excelsior	\$253,000

Substantial Amendments to Prior Years' Plans

Not applicable in March 2024

The 2020-2024 Consolidated Plan, the 2024 Annual Action Plan and funding recommendations are available to download or view on the CHHS website:

<https://my.spokanecity.org/chhs/documents/>

AMERICANS WITH DISABILITIES ACT (ADA) INFORMATION: The City of Spokane is committed to providing equal access to its facilities, programs, and services for persons with disabilities. The Council Briefing Center in the lower level of Spokane City Hall, 808 W Spokane Falls Blvd., is equipped with an infrared assistive listening system for persons with hearing loss. Headsets may be checked out (upon presentation of picture ID) through the meeting organizer. Individuals requesting reasonable accommodations or further information may call, write, or email Risk Management at 509.625.6221, 808 W Spokane Falls Blvd, 9920, or mLOWmaster@spokanecity.org. Persons who are deaf or hard of hearing may contact Risk Management through the Washington Relay Service at 7-1-1. Please contact us forty-eight (48) hours before the meeting date. **NON-ENGLISH SPEAKING:** The Consolidated Planning Process intends, to the maximum extent feasible, to accommodate the needs of non-English speaking residents. The City website has interpretation capability for document reviews. Individuals requesting an interpreter should contact the CHHS Department. All accommodation requests should be made 72 hours prior to the public hearing, however, if a request is made, every reasonable effort will be made to provide an interpreter. For further information, contact the CHHS Department at 509.625.6325.

