



**HOME-ARP ALLOCATION
PLAN SUBSTANTIAL
AMENDMENT TO CITY OF
SPOKANE ANNUAL ACTION
PLAN**

Public Comment DRAFT

Community, Housing and Human Services Department (CHHS)

Consultation:

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

The City of Spokane and Spokane County conducted joint planning for HOME ARP. A total of eight (8) Presentations were given to member organizations or individuals representing the Continuum of Care, Housing Authority, homeless service and shelter providers (including the 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 with dates of presentations. 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, A vista, 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.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Human Rights Commission	Racial Equity	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.
YWCA	Domestic Violence Shelter	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.
Volunteers of America	Homeless shelter(s), service provider, permanent supportive housing provider	In person, electronic communication, phone conversations	Youth and young adults are a priority for VOA's shelter system. Several funding streams have been guaranteed and more funding is needed to complete a planned project near Spokane Community College to provide shelter and temporary housing for youth and young adults. Foster children aging out and others who attend college will safe and stable and better able to succeed:
Spokane Low Income Housing Consortium	Affordable housing development organization.	In person presentation to the group with electronic communication follow up to those who did not attend in person	Several members of the organization provided feedback on the challenges of funding multi-family housing projects. They began to think about how these 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	The region shares concerns about homelessness and the Regional Governance Council discussed the

		communication, phone conversations.	needs of the homeless crisis response system, including the need to safe-guard youth and young adults from chronic homelessness or incarceration.
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 Advisory Committee	Representatives of Urban Consortium jurisdictions; 12 cities and towns in Spokane Valley	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
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.
Catholic Charities of Eastern Washington	Lead organization for family Coordinated Entry System for Spokane Regional homeless crisis support network.	Electronic meeting to discuss the CE System Chart to ensure accuracy	There is Individual CE and Family CE serving the regional homeless response system. Furthermore, there is YY A CE under development, Right of Way (ROW) CE serving Camp Hope, and The Salvation Army which has CE for the "Way-Out" Shelter. HOME ARP will meld into the CE system serving all qualified populations.

Empire Health Foundation	Lead organization for updating the CE for the Spokane Regional homeless crisis support network	Electronic meeting to discuss the planned update and coordination with existing CE systems	Although administering the ROW CE system, Empire Health foundation has funds to assist with the other CE lead organization to make the system even more responsive to the homeless individuals and families
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.

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 common knowledge that the City of Spokane and Spokane County lack adequate affordable housing 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: 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 reach 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.

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 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:

To be completed following the 30-day comment period

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

To be completed following the 30-day comment period

Needs Assessment and Gaps Analysis:

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	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.

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	74,150		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	38,530		
Rental Units Affordable to HH at 50% AMI (Other Populations)	17,270		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		12,070	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		11,385	
Current Gaps			23,455

Data Sources: 1. CMIS Community Management Information System

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

Homeless as defined in 24 CFR 91.5

Of the 1,757 people counted as meeting the HUD definition of Homeless during the 2022 Point In Time count, the following demographics were identified:

- 3% Male, 35% Female, and Less than 2% identified as Transgender, gender non-conforming.
- 74% White, 10% Multiple Races, 8% Black or African American, 6% American Indian or Alaska Native, 2% Native Hawaiian or other Pacific Islander, & > 1 % Asian.
- 2% Children < 18yo, 5% Young Adults 18-24, 93% Over the age of 24.
- 47% were unsheltered.
- 41% were sheltered.
- 12% were in transitional programs.

When looking at the data collected for those who experience sheltered and unsheltered homelessness, it was estimated that approx. 1,460 single count of persons, with 290 families

count of persons, and 10 children only count of persons. On the night of the 2022 PIT count, slightly more of the unhoused population were found in emergency and transitional shelters (934). Eight hundred and twenty-three individuals were surveyed on the streets (or unsheltered).

At Risk of Homelessness as defined in 24 CFR 91.5

Other qualified populations include a subset of the over 12,000 households with at least one severe housing burden who are at 0-30% of the Area Median Income and an additional 11,385 households with at least one severe housing burden making 30-50% of the local AML.

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 157 total individuals, 72 of which were living in an emergency shelter, 25 in Transitional homes, and 60 individuals counted who were living 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

Enter narrative response here.

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 most recent 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 are 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.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

When looking at the 2022 Point in Time count the data that was collected for those who experience sheltered and unsheltered homelessness, it was estimated that approx. 1,457 single counts of persons, with 290 families count of persons and 10 children count of persons. On the night of the 2022 PIT count, 823 individuals were reported to be living unsheltered, with 725 counted in shelters along with 209 individuals living in transitional housing programs. Although the number of people staying in emergency shelters has fluctuated over time, the trendline has sloped upwards over the past 3 years. These fluctuations occur due to a complex set of factors including overall need, weather, and disease outbreaks (most recently COVID-19).

The unsheltered respondents were asked, "What keeps you from using one of the regional shelters, check all that apply." Of the Eight Hundred and Twenty-Three (823), Five hundred and twenty-three (523) people answered that the most common response was safety or fear of violence (44%), followed by privacy (38%), anxiety (34%), rules (31 %), and hours of operation or entry time (24%).

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 157 total individuals, 72 of which were living in an emergency shelter, 25 in Transitional homes, and 60 individuals counted who were living 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. Among the unhoused population in 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 54% increase in the unhoused population from the 2020 PIT count to the 2022 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.

Homelessness is a complex issue, with many risk factors that can make one vulnerable to becoming homeless. However, not all risk factors operate in the same way. There is a distinction between what is called the "structural determinants" (e.g., housing and labor market dynamics) and the "individual risk factors," such as mental illness, substance abuse, domestic violence, physical disabilities, and so on.

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 Comprehensive Housing Affordability Strategy (CHAS) data (<https://www.huduser.gov/portal/datasets/cp.html>) reports that 64,325 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.

These trends point to what kinds of improvements to the emergency shelter system might better accommodate persons making alternative sheltering choices. For example, if the goal is to encourage more people in encampments to use emergency shelters instead, then we need to address why people perceive shelters to be unsafe.

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. This is, of course, an oversimplification but imagine that the person in the middle (middle-income person) can only afford the least expensive house. If that were the case, the other two people would be squeezed out of housing.

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 (orange line). Further, 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 \$ 77 4 but the average cost of a 1-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.

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 HOME-ARP plan, funds will be allocated through a competitive Request for Proposals process. The CHHS Affordable Housing Committee will assist the City of Spokane in developing the RFP, will develop the criteria for selecting proposals and will review the proposals for selection.

The competitive 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.

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 administrative funds will be allocated to subrecipients prior to HUD's acceptance of the City of Spokane's HOME-ARP plan.

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Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 231,433.00 (5%)		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ 462,867.00 (10%)		
Development of Affordable Rental Housing	\$ 3,240,070.00 (70%)		
Non-Profit Operating	\$	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 694,300.00 (15%)	15 %	15%
Total HOME ARP Allocation	\$ 4,628,671.00		

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, in addition to public comment during the consultation period, indicate that increasing the affordable housing inventory is a priority for the City of Spokane. As such, most of the HOME-ARP allocation, or \$3,000,000, is dedicated to the development of affordable housing. Another \$300,000 provides Tenant-based Rental Assistance to Spokane resident to assist people at risk of homelessness from becoming homeless, and to help individuals and families who are homeless to become housed.

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 and Spokane County 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. The City of Spokane will utilize the HOME-ARP funds to aid organizations in providing affordable housing and supportive services to the eligible 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:

Enter narrative response here.

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:

Increasing the supply of affordable rental housing for low- and extremely low-income households will help the City of Spokane reach the affordable housing goal as stated in the 2020-2024 Consolidated Plan and meet the needs of the qualifying populations as identified in CPD 21-10.

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Template:

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:

Enter narrative response here.

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):

Enter narrative response here.

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):

Enter narrative response here.

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):

Enter narrative response here.

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):

Enter narrative response here.

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:

NA

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):

NA

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*

No rehabilitation will be funded with HOME-ARP funds

- *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.*

NA

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

NA

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

NA

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

NA

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

NA

Public Comment DRAFT

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

Public Comment DRAFT

Housing and Community Development Advisory Committee

City of Airway Heights - 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-Elizabeth Rosenbeck
Town of Millwood-Kate Mclachlan
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-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

Public Comment DRAFT

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@cisspokane.org

Cheney Outreach Center,

East Valley School District,

Pioneer Human services,

Parkview Early Learning Centers,

Nine Mile Falls School District