

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, and continuing need for tenant-based rental assistance 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: 12/30/2023***
- ***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.

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 TBD

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, TBD

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.

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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

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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@cisspokane.org

Cheney Outreach Center,

East Valley School District,

Pioneer Human services,

Parkview Early Learning Centers,

Nine Mile Falls School District