**HOME-ARP Allocation Plan Template**

**Participating Jurisdiction: State of Utah** **Date: 02/08/2022**

**Introduction**

The Utah Department of Workforce Services’ (DWS) Office of Homeless Services (OHS) has been charged with allocating and administering $12,978,715 awarded by The U.S. Department of Housing and Urban Development (HUD) through the HOME Investment Partnerships American Rescue Plan Program (HOME-ARP). This funding is for addressing homelessness and housing instability throughout Utah and can only be used to serve individuals that meet one of the following definitions, defined as “Qualifying Populations” in the HUD funding notice:

* Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([**42 U.S.C. 11302(a)**](http://uscode.house.gov/quicksearch/get.plx?title=42&section=11302));
* At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act ([**42 U.S.C. 11360(1)**](http://uscode.house.gov/quicksearch/get.plx?title=42&section=11360));
* Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
* In other populations where providing supportive services or assistance under section 212(a) of the Act ([**42 U.S.C. 12742(a)**](http://uscode.house.gov/quicksearch/get.plx?title=42&section=12742)) would prevent the family’s homelessness or would serve those with the greatest risk of housing instability;
* Veterans and families that include a veteran family member that meet one of the preceding criteria.

Activities that can be undertaken with the funding can only be one of the following:

* Produce or preserve affordable housing;
* Provide Tenant-Based Rental Assistance (TBRA);
* Provide supportive services, including services defined at [**24 CFR 578.53(e)**](https://www.ecfr.gov/cgi-bin/text-idx?SID=9a8fd6a4725093b46175a972cc064307&mc=true&node=se24.3.578_153&rgn=div8), homeless prevention services, and housing counseling;
* Purchase and develop non-congregate shelter. These structures can remain in use as non-congregate shelter or can be converted to: 1) emergency shelter under the [**Emergency Solutions Grants (ESG) Program**](https://www.hudexchange.info/programs/esg/); 2) permanent housing under the [**Continuum of Care (CoC) Program**](https://www.hudexchange.info/programs/coc/); or 3) affordable housing under the [**HOME Program**](https://www.hudexchange.info/programs/home).

After receiving notice of the funding award, OHS began performing an analysis on the need for these activities in Utah by utilizing data on homelessness and housing affordability available at the state and local level, consulting with local homeless councils, service providers, and other partners. After conducting this process, OHS has developed the following allocation plan proposal for HUD to review. This plan is designed to ensure that HOME-ARP funding is distributed in a coordinated, equitable fashion in order to make address the areas of greatest need in Utah.

**Consultation**

The State of Utah consulted with a wide variety of partners with expertise in serving HOME-ARP qualified populations. Utah divides the state into 13 areas with similar demographics and who have a history of collaboration in regards to serving those experiencing homelessness. These areas are called Local Homeless Councils (LHC) and each has identified local leadership that is tasked with overseeing the homeless response system for that LHC. Each of the 13 LHC’s were approached for their input on the best use of HOME-ARP funds in relation to ending homelessness in their area. In addition to engaging with CoCs, LHCs, and mainstream homeless service providers, efforts were made to include groups with expertise who have not always participated in the CoC or LHC structure, such as the Disability Law Center and Utah ACLU.

Partners were provided with an overview of the HOME-ARP requirements and were invited to provide their recommendations via virtual meetings or written responses. The online meeting facilitated discussion on general areas where the HOME-ARP funds may be effective. Specific recommendations for projects or programs were not considered through the consultation process. Areas with specific projects were encouraged to engage local leaders about the opportunity that HOME-ARP provides and to begin laying the groundwork for project applications once the allocation plan was approved.

**Organizations consulted**

|  |  |  |  |
| --- | --- | --- | --- |
| Agency/Org Consulted | Type of Agency/Org | Method of Consultation | Feedback  |
| Salt Lake Area VA | Veterans Organization | Zoom call | Housing is a major need for homeless veterans.  |
| Utah Domestic Violence Coalition | Domestic Violence Coalition | Zoom Call, Web Survey | Additional housing and shelter capacity are needed for survivors of domestic violence. DVSPs are very interested in capacity building. |
| Utah Department of Human Services | State Government | Zoom call | The biggest gaps in their area of expertise is “step down” and transitional housing for those exiting mental health programs. Local health authorities gather data on people experiencing homelessness when entering programs, which will be used to show gaps for housing supports for those individuals. Non-congregate shelter is preferred over congregate shelter for the population of those with severe mental illness.  |
| Utah Balance of State CoC Leadership | CoC  | Google Meet, Web Survey | Need in the BoS is varied. Specific in the Weber county area, there are political barriers to non-congregate shelter though the need is great. Higher need for affordable housing and highly supportive housing vouchers.  |
| Utah Disability Law Center | Private non-profit | Email | There needs to be a focus on development of housing, which is physically accessible, deeply affordable, and does not segregate residents with disabilities from the larger community. |
| Mountainland CoC | CoC | Zoom, Web Survey | The CoC sees non-congregate shelter and additional affordable housing as their greatest needs. Non-congregate shelter is a particularly high need as the only emergency shelter facilities currently in the CoC are DV dedicated and there is a need for more widely accessible shelter.  |
| ACLU of Utah | Private non-profit | Email and Phone Requests | None |
| Six County AOG | LHC Member | Phone, Web Survey | There is a need for supportive services, agency capacity building, and non-congregate shelter. |
| Bear River AOG | LHC Member | Google meet and email, Web Survey | Affordable housing and non-congregate shelter are a priority. Non-congregate could be as simple as a winter emergency facility. Supportive services and capacity building are also needed.  |
| Ogden and Weber Housing Authorities | BoS Leadership and Public Housing Authority | Google Meet | Need for affordable housing development and multiple projects in different stages of construction. Affordable housing funding would immediately impact the inventory in the Weber LHC.  |
| Switchpoint Tooele | LHC member | Phone and Email | Affordable Housing and non-congregate shelter are top priorities. Have projects that have a small gap left to proceed.  |
| Switchpoint and St. George City | LHC Chair and member | Email | Non-congregate shelter is the priority |
| Moab Valley Multicultural Center | LHC member | Google Meet, Web Survey | Supportive services are lacking for immediate housing needs. A small Non-congregate shelter is another priority to provide somewhere for people to stay while looking for housing.  |
| Iron County Care and Share | LHC member | Zoom | Affordable housing and gap financing are extremely needed. Small non-congregate facility with flexibility would also be beneficial.  |
| San Juan County | LHC member | Google form | Tenant Based Rental Assistance is the top priority, followed by supportive services.  |
| New Horizons Crisis Center | LHC member/Domestic violence service provider | Phone Call | Affordable housing, non-congregate shelter, and capacity building are priorities in their community |

*Some organizations have been grouped with the larger LHC for easier viewing. All feedback received is presented as noted by the Office of Homeless Services staff conducting the consultation process.*

**Public Participation**

* **Public comment period:** 02/08/2022-02/23/2022
* **Public hearing:** conducted via zoom and in person at the Olene Walker Building in Salt Lake City, UT on 02/18/2022

Public comment was encouraged as part of every consultation meeting. Notice of public comment period was sent to all members of the Utah Homeless Network and published on the Utah Public Notice website. A press release was shared with media sources provided by the Utah Department of Workforce Services outlining the time, place, and method for providing public input.

A virtual public hearing was held on XXXX via Zoom virtual meeting/call in with an in-person anchor location of the Olene Walker Building, 140 E 300 S, SLC UT 84111. Public notice was published in both Spanish and English, with a translator available for the virtual/call in public hearing. Information concerning virtual meeting access posted to public notice website.

**Summary of the comments and recommendations received through the public participation process:**

To be determined after public hearing

**Summary of any comments or recommendations not accepted and the reason(s) why:**

To be determined after public hearing

**Needs Assessment and Gaps Analysis**

*2021 Point in Time and Housing Inventory Count*

|  |  |  |
| --- | --- | --- |
|  | **Current Inventory** | **Homeless Population** |
| Total | Family | Adults Only | Vets | DV | Total | Family HH (at least 1 child) | Adult HH (w/o child) | Vets | Victims of DV |
| # of Beds | # of Units | # of Beds | # of Units | # of Beds | # of Units | # of Beds | # of Beds |
| Emergency Shelter |  | 2,621 |  | 826 | 127 | 1,267 |  | 0 | 495 |  |  |  |  |  |
| Transitional Housing |  | 587 |  | 405 | 120 | 181 |  | 97 | 335 |  |  |  |  |  |
| Permanent Supportive Housing |  | 3,276 |  | 1,197 | 315 | 2,079 |  | 847 | 10 |  |  |  |  |  |
| Other Permanent Housing |  | 64 |  | 42 | 9 | 22 |  | 12 | 0 |  |  |  |  |  |
| Rapid Rehousing |  | 1,436 |  | 995 | 297 | 441 |  | 203 | 119 |  |  |  |  |  |
| Sheltered Homeless | Households |  |  |  |  |  |  |  |  | 1,875 | 221 | 1,644 | 129 |  |
| Individuals |  |  |  |  |  |  |  |  | 2,410 | 746 | 1,653 | 133 (Total individuals, 129 vets) | 559 |
| Unsheltered Homeless | Households |  |  |  |  |  |  |  |  | ? |  |  |  |  |
| Individuals |  |  |  |  |  |  |  |  | 1,155 |  |  |  |  |
| Total Homeless | Households |  |  |  |  |  |  |  |  | >1,875 | >221 | >1,644 | >129 |  |
| Individuals |  |  |  |  |  |  |  |  | 3,565 | >746 | >1,653 | >133 (Total individuals, 129 vets) | >559 |

*2020 Point in Time and Housing Inventory Count*

|  |  |  |
| --- | --- | --- |
|  | **Current Inventory** | **Homeless Population** |
| Total | Family | Adults Only | Vets | DV | Total | Family HH (at least 1 child) | Adult HH (w/o child) | Vets | Victims of DV |
| # of Beds | # of Units | # of Beds | # of Units | # of Beds | # of Units | # of Beds | # of Beds |
| Emergency Shelter |  | 2,563 |  | 879 | 148 | 1,388 |  | 0 | 556 |  |  |  |  |  |
| Transitional Housing |  | 550 |  | 360 | 100 | 189 |  | 105 | 309 |  |  |  |  |  |
| Permanent Supportive Housing |  | 3,085 |  | 1,338 | 408 | 1,781 |  | 741 | 21 |  |  |  |  |  |
| Other Permanent Housing |  | 174 |  | 56 | 13 | 118 |  | 5 | 0 |  |  |  |  |  |
| Rapid Rehousing |  | 999 |  | 640 | 178 | 359 |  | 87 | 71 |  |  |  |  |  |
| Sheltered Homeless | Households |  |  |  |  |  |  |  |  | 1,745 | 283 | 1,449 | 98 |  |
| Individuals |  |  |  |  |  |  |  |  | 2,427 | 961 | 1,453 | 104 (98 Vets) | 656 |
| Unsheltered Homeless | Households |  |  |  |  |  |  |  |  | 639 | 7 | 632 | 16 |  |
| Individuals |  |  |  |  |  |  |  |  | 704 | 20 | 684 | 17 (16 Vets) | 70 |
| Total Homeless | Households |  |  |  |  |  |  |  |  | 2,384 | 290 | 2,081 | 114 |  |
| Individuals |  |  |  |  |  |  |  |  | 3,131 | 981 | 2,137 | 121 (114 Vets) | 726 |

**Size and demographic composition of qualifying populations within the PJ’s boundaries**

The 2020 and 2021 Point in Time Counts each found that over 3,100 Utahns experience literal homelessness on a single night in January. The data from the Utah Homeless Management Information System (UHMIS) shows that over 10,000 Utahns experienced sheltered homelessness during Federal Fiscal Year 2022. This annual count does not include those experiencing unsheltered homelessness, a population which made up about 23% of the 2020 PIT count and which our communities and partners report grew during 2021, or those in facilities that do not enter into the system. Each of these statistics are considered to understate the total population of those experiencing homelessness in the state due to the difficulties in achieving a complete PIT count and the limitations on UHMIS participation.

The majority of those experiencing homelessness during the 2020 PIT count, 68%, were adults in households without children, while individuals in households of adults and children made up 31% of those counted. Unaccompanied children made up less than 1% of the overall count. 726 of those counted in 2020 identified as currently fleeing domestic violence, accounting for 23% of the total count. Veterans made up 4% of Utah’s 2020 count, with 114 verified as experiencing homelessness on the night of the count.

Those experiencing housing instability who may be at risk of homelessness are very difficult to quantify. Additional efforts were not made to measure this qualifying population as the large number of those experiencing literal homelessness and the availability of additional rental support funding in the state made those still in housing a lower priority for this funding source.

**Unmet housing and service needs of qualifying populations**

All of the eligible activities listed in the HOME-ARP notice were identified during the consultation process as insufficient to meet the needs of the qualifying populations. Every partner that provided input for HOME-ARP activities described shortages in affordable housing, case management, rapid rehousing, and agency capacity building.

The shortage of affordable housing and supportive services for only those experiencing literal homelessness is far in excess of the funding awarded to the State of Utah in HOME-ARP. Different agencies and different methods of quantifying the shortage of housing and services yield different sizes of the gap, but all find that the amount of affordable housing in any community is below what is required for those who require it.

An example of one such study to find the housing gap was conducted by the Salt Lake CoC in August 2021 which found that in Salt Lake County alone there was a shortage of 900 deeply affordable housing units (under 40% AMI) and 750 permanent supportive housing units. This gap was anticipated to grow 47% each year in both categories.

**Current resources available to assist qualifying populations**

Currently, Utah has a variety of mechanisms to assist in the creation of affordable housing and for maintaining current supportive services capacity. This includes the National Housing Trust Fund, HOME, Low Income Housing Tax Credits, Local Affordable Housing Development Funds, State of Utah general funds, Emergency Solutions Grant funding, Temporary Assistance for Needy Families funding, Housing Opportunities for Persons with Aids, CoC Supportive Housing Vouchers, and other similar funding sources dedicated to the qualifying populations listed in the notice.

Even with all of the available funding sources, the gap in affordable housing continues to grow, according to all available measures and feedback from those consulted in regards to HOME-ARP funding. Additionally, Utah is considered by national housing experts to be experiencing one of the most severe rental price increases in the United States. (https://www.deseret.com/utah/2021/9/13/22671694/report-rent-prices-in-these-utah-counties-are-skyrocketing-entrata-salt-lake-utah-county)

Currently in Utah, there is not a dedicated funding source for the creation of non-congregate shelter, making HOME-ARP a unique funding source for those communities who lack capacity to shelter all individuals experiencing homelessness or in need of crisis shelter services.

**Gaps within the current shelter and housing inventory as well as the service delivery system**

The Point in Time Count, Housing Inventory Count, and Utah Affordable Housing report were all utilized in the analysis of housing inventory and shelter bed gaps. Every community consulted and reviewed showed an affordable housing gap, with the estimated statewide need at approximately 50,000 units. This gap extends to homeless-dedicated and supportive housing units. Additionally, providers in large metropolitan areas identified the lack of supportive housing case management as an additional gap for qualifying populations. The 2020 and 2021 Point-in-Time Counts and Housing Inventory Counts also demonstrate that there are not enough emergency shelter beds in the state to meet the needs of all those in need of shelter on a single night.

The 2020 counts showed a deficit of nearly 200 beds statewide with 77% of the current supply occupied on that night. The deficit is higher when the ability of those experiencing unsheltered homelessness to access beds dedicated to youth and domestic violence survivors is considered in the analysis, with 83% of undedicated beds being full and the majority of the unsheltered population not qualifying for a bed dedicated to specific subpopulations. While methodology changes made in light of COVID-19 make it difficult to make direct comparisons between the 2021 and 2020 counts, those results and the consensus of community partners indicates that the deficit grew during 2021. 2021 also revealed the limits of the congregate shelter facilities that make up the vast majority of Utah’s emergency shelter supply, with many needing to reduce capacity in order to enact COVID-19 safety measures.

The need for emergency shelter impacts all three of Utah’s CoCs, but is especially stark outside of Salt Lake County. Eight of the thirteen local homeless councils (LHCs) in Utah, all of which are in the Mountainland and Utah Balance of State CoCs, do not currently have a year-round shelter facility that is able to serve anyone experiencing homelessness. As a result, these areas have to rely on hotel vouchers or transport households to other parts of the state in order to meet the shelter needs of their residents. Neither option is ideal, as relying on hotels results in high costs and is subject to limited availability, particularly in rural areas with thriving recreation and tourism industries, while forcing individuals to seek shelter elsewhere imposes additional burdens and barriers on those already coping with the harsh realities of experiencing homelessness.

**Priority needs for qualifying populations**

During the consultation process, it was identified by all partners that those meeting the first qualifying population criteria of literal homelessness were the highest need of the qualifying populations listed in the HOME-ARP notice. The top priority identified in consultation with providers, partners, and available data was the creation of new deeply affordable housing. Second was the need for additional non-congregate shelter options, especially in rural areas that do not have any available crisis shelter.

**HOME-ARP Activities**

**Anticipated method for soliciting applications for funding and/or selecting developers, service providers, sub-recipients and/or contractors**

The State of Utah will not administer any activities directly. All projects will be selected via a request for grant applications, in accordance with established State of Utah Department of Workforce Services policy. Local stakeholders, such as LHC leadership and city and county staff who are familiar with the needs of those experiencing homelessness, will be utilized during the review, scoring, and selection process. All funding will be allocated according to regional needs and projects in the same region will be grouped together when reviewing applications. Other statewide entities unique to Utah, such as the Utah Homeless Network and the Utah Homelessness Council, will also be utilized in the review, scoring, and selection of eligible projects.

*Proposed Use of HOME-ARP Funding*

|  |  |  |  |
| --- | --- | --- | --- |
|  | **Funding Amount** | **Percent of the Grant** | **Statutory Limit** |
| Supportive Services  | $ 973,403.80  |  |  |
| Acquisition and Development of Non-Congregate Shelters  | $ 5,840,422.80  |  |  |
| Tenant Based Rental Assistance (TBRA)  | $ 0.00 |  |  |
| Development of Affordable Rental Housing  | $ 2,920,211.40  |  |  |
| Non-Profit Operating  | $ 648,935 | 5% | 5% |
| Non-Profit Capacity Building  | $ 648,935 | 5% | 5% |
| Administration and Planning | $ 1,946,807 | 15 % | 15% |
| **Total HOME ARP Allocation**  | $12,978,715 |  |  |

**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**

Utilizing existing data from HMIS and HUD, there is a demonstrated gap in shelter and housing in every Local Homeless Council (LHC) in Utah. The affordable housing deficit in Utah continues to grow and the real estate market is among the fastest growing in the country. Additionally, the Point in Time count conducted each year shows a growing gap between those seeking shelter and the number of beds available. With this information, it was determined that each area of the State has sufficient need to improve both shelter and housing inventory, if available resources exist both politically and fiscally.

When considering the process of selecting individual projects for funding, priority will be given to projects that are not eligible for HOME-ARP from other participating jurisdictions, followed by those that have already secured funding from other sources, including other PJs’ HOME-ARP. Consideration will also be given to the needs of the area and the proportion of the available HOME-ARP funding that is being utilized in a particular LHC. Hard caps on funding for a specific project or a specific LHC are not being suggested at this time, but may be considered in the future.

Given the current focus on affordable housing and multiple funding streams being pursued to address that need, greater focus is given to the unique activity available through HOME-ARP of acquisition and development of non-congregate shelter. The Point in Time count conducted each year justifies this focus and highlights the need for a larger, more diverse emergency shelter inventory throughout the state.

Proposed funding for Supportive Services, Development of Affordable Rental Housing, and Acquisition and Development of Non-Congregate Shelter was determined according via formula based on priorities identified during the gap analysis and consultation process.

**HOME-ARP Production Housing Goals**

**Estimated number of affordable rental housing units for qualifying populations produced or support with HOME-ARP allocation**

With the amount of money proposed to be used for affordable housing, it is estimated that 45 units of affordable housing will be created. This is assuming that funding will not entirely fund the creation of affordable units, or that rehabilitation will be limited to $65,000 per unit. This is only an estimation and does not include any housing accessed through supportive services.

This goal of the creation of 45 new or newly affordable housing units is small compared to the overall need in the State. By targeting these units in areas that are not normally focused on for affordable housing development, and where the need is smaller than in large population centers, this will create a much larger impact. Additionally, these 45 units could encourage other development in these areas and prove the feasibility of pursuing affordable units in rural areas.