

HOME-ARP Allocation Plan Template

Guidance

- To receive its HOME-ARP allocation, a PJ must:
 - Engage in consultation with at least the required organizations;
 - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further Fair Housing;
 - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - Anti-Lobbying;
 - Authority of Jurisdiction;
 - Section 3; and,
 - HOME-ARP specific certification.

Participating Jurisdiction: City of Miami Beach

Date: 1/20/2022

Substantial Amendment

A substantial amendment is being made to the 2021 Action Plan to amend the HOME-ARP Allocation Plan. This amendment reallocates \$112,269.35 from Non-Profit Capacity Building to Supportive Services. The updated budget can be found on page 9, and details of the Citizen Participation process are provided on page 3.

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

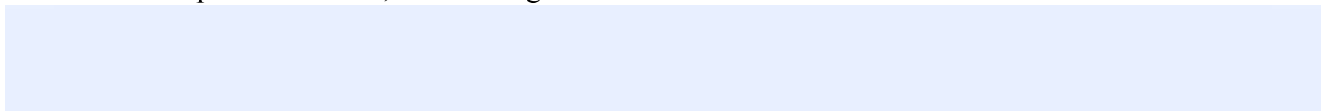
Summarize the consultation process:

The City held various meetings with service providers in the Continuum of Care, to determine the current service needs in the community and the approximate funding required. The City also held a meeting with the Housing Authority of the City of Miami Beach to discuss the service gaps in voucher programs and subsidized housing programs.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Homeless Trust	Continuum of Care	Virtual Meeting-10/18/2021	The Homeless Trust informed the City of their pending housing projects for those that are homeless and at-risk of homelessness.
Legal Services of Greater Miami	Legal Services	Virtual Meeting 10/27/2021	Legal Services of Greater Miami provided a proposal for supporting services to address the service gaps for households at-risk of homelessness.
Miami Beach Community Development Corporation	Non-profit housing provider	Virtual Meeting 10/28/2021	Miami Beach Community Development Corporation provided a request for funding to preserve the agency's capacity as a housing provider for populations at-risk of homelessness.
Lotus House Shelter	Service Provider for Victims of Domestic Violence	Virtual Meeting 01/12/2022	The Lotus House expressed interest in submitting a proposal for funds. The organization provided information on the need for services for the victims of domestic violence and homeless women and children.
Housing Authority of City of Miami Beach	Public Housing Authority	Virtual Meeting 10/28/2021	The organization is interested in submitting an application for acquisition and rehabilitation of housing for low-income residents. A needs analysis was also provided to explain the current funding gaps.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.

If additional space is needed, insert image of table here:



Public Participation

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

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

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

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:

- ***Public comment period:*** start date - 11/8/2021 end date – 12/8/2021
- ***Public hearing:*** 11/16/2021

The City did not receive public comments regarding the allocation of HOME-ARP funds. A public comment period for the substantial amendment was open from June 24, 2024 to July 23, 2024, with a public hearing held on July 10, 2024.

Describe any efforts to broaden public participation:

The public hearing was held on November 16 during the Affordable Housing Advisory Committee meeting, which is advertised by the Office of the City Clerk. The public hearing was also advertised in the Miami Herald and the City’s website.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

The City did not receive comments or recommendations throughout the public participation process.

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

Not applicable.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data

available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

DRAFT

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	47	#	47	#	#								
Transitional Housing	0	#	22	#	#								
Permanent Supportive Housing	0	#	48	#	#								
Other Permanent Housing						#	#	#	#				
Sheltered Homeless						#	#	#	#				
Unsheltered Homeless						#	183	#	#				
Current Gap										#	#	#	#

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

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	2,047		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	76		
Rental Units Affordable to HH at 50% AMI (Other Populations)	118		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		4,454	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		4,120	
Current Gaps			6,333

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

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

The City's overall population is 90,108. According to the Shimberg Center for Housing Studies, 9.5% of the population are renters that are considered severely cost-burdened. The City's overall vision of providing neighborhoods with affordable, safe and decent housing continues to be the long-term goal that requires a diverse collaboration with local CHDOs, community partners, foundations and others.

Barriers that continue to inhibit our ability to complete our long-term goals include:

- Limited funding and the high cost of real estate values in the City of Miami Beach;
- The average sales price for a single-family home was \$3,769,336 in 2020. The median sales price that year was \$1,769,250, compared to a median sales price of \$402,000 in Miami-Dade County (Produced by Florida REALTORS® with data provided by Florida's multiple listing services). The median sales price for condominiums in 2020 was \$329,000, compared to \$264,000 in Miami-Dade County (Produced by Florida REALTORS® with data provided by Florida's multiple listing services.);
- Limited long-term, community-based residential options with supportive services for those who need help with daily living activities, housekeeping, self-care, social services and other assistance;
- An absence of community development partners and CHDOs with the capacity to develop affordable housing in the City within defined timeframes;
- Inability of program recipients to acquire gap funding from additional financial sources for construction and rehabilitation projects; and
- Limited number of properties with multiple bedrooms to serve larger families.

Based on the limitations listed above, the access to affordable units continues to become increasingly challenging.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness;***
and,
- ***Those at greatest risk of housing instability or in unstable housing situations:***

The City has calculated that renter 6,333 households are cost-burdened and at-risk of homelessness. In 2020 and 2021, there was a considerable loss of affordable units throughout the City, forcing residents to relocate outside of City limits. There are an estimated 3,073 Housing Choice Vouchers available throughout the City, however, only 2,566 are being utilized. Voucher

recipients are experiencing great difficulties locating units within the voucher's price range and are forced to look outside of city limits.

The 2021 Miami-Dade County Community Homeless Plan, prioritizes Seniors and persons identified by the CDC at high risk of death during a pandemic for permanent housing, in addition to persons fleeing domestic violence; human and sex trafficking; youth, families and veterans.

The City met with the Miami-Dade County Homeless Trust, which expressed a need for the additional funding needed for the construction of a shelter for elderly in Miami. Although the proposed activity is not within the PJ's geographic boundaries, the City continues to work with the Miami-Dade County Homeless Trust to fund additional programming for homeless persons in Miami Beach.

The City met with four (4) additional agencies that provide services to at-risk of homelessness and homeless to obtain information on the current service gaps in the community.

Lotus House- This agency shelters over 1,550 women, youth and children annually. While the City is currently collaborating by obtaining shelter beds for women and children, and victims of domestic violence, additional services are needed.

Legal Services of Greater Miami- This agency provides services to low-income persons and homeless persons throughout Miami-Dade County. From March 13, 2020 to September 30, 2021 the Miami-Dade County Clerk of Courts filed 1,061 evictions for Miami Beach households. Between November 1, 2020-October 31, 2021, Legal Services was unable to fully serve 122 Miami Beach residents. The City recognizes the service gap and intends to increase the availability of services to households at-risk of homelessness.

Miami Beach Community Development Corporation- The non-profit housing agency provides housing to 323 low-income households. The agency is experiencing deficits in their financial capacity to operate and they've expressed their need for additional funding to the City and various municipalities.

Housing Authority of City of Miami Beach- The Housing Authority of City of Miami Beach seeks to increase the availability of affordable housing for low-income Miami Beach households and those households at-risk of homelessness.

Subsequent to the consultation process, the City issued a Request for Proposals to various agencies for HOME, CDBG and HOME-ARP funds. The notice of the Release of the RFP was sent to a listserv of 46 members, published on the website and disseminated to the Miami-Dade Eviction Task Force.

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:

Currently, the City provides funding for the following service activities:

Congregate Shelter Units: 47 beds contracted through various shelter providers
Supportive Services: CDBG currently funds public services for elderly and households at-risk of homelessness
TBRA: CDBG and General funds for a maximum six months for rent/mortgage and utility assistance
Affordable and Permanent Supportive Rental Housing: FY 21 HOME and CDBG funds have been allocated to affordable housing capital projects and homeowner assistance.

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

Currently, there is only one zero-bedroom apartment available for fair market rent. The City is continuously trying to assess resources to fund the rehabilitation or development of affordable housing.

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

The following characteristics of housing associated with instability, as defined in Section IV.A.4.2.ii.G. of the Notice, will be utilized when assisting “other populations”:

(ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5: (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance; (B) Is living in the home of another because of economic hardship; (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance.

Identify priority needs for qualifying populations:

Elderly and disabled.

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

Various service agencies within the Continuum of Care provided data.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

The City will be issuing a Request for Proposal on January 24, 2022 to receive solicitations from providers.

If any portion of the PJ's HOME-ARP administrative funds were 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:

Not applicable.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 396,309.60 \$508,578.95		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 1,400,000		
Non-Profit Operating	\$ 0	# %	5%
Non-Profit Capacity Building	\$ 112,269.35 \$0	0 5 %	5%
Administration and Planning	\$ 336,808.05	15 %	15%
Total HOME ARP Allocation	\$ 2,245,387.00		

Additional narrative, if applicable:

Enter narrative response here.

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:

Although the development of affordable rental housing is the greatest need in the community, the City also recognizes that service providers are struggling with capacity building and service delivery to qualifying populations. Therefore, the City is proposing the allocation mentioned above to supportive services and ~~non-profit capacity building~~. The service categories will be finalized once the City reviews all solicitations and proposals to determine the most viable methods of expending funds.

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 estimates that 20 affordable housing units will be acquired and/or preserved.

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

The City hopes to continue allocate all available resources to the creation, retention and development of affordable housing for qualifying populations.

Preferences

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:

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

Enter narrative response here.

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 category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

Not applicable.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***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***

The City does not plan to use HOME-ARP funds to refinance 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.***
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
The City seeks proposals to acquire, construct or rehabilitate existing affordable housing units.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
The required compliance period will be 30 years for rental housing.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
HOME-ARP funds cannot be used to refinance multifamily loans. This has been stipulated in the Program Policies and Procedures.
- ***Other requirements in the PJ's guidelines, if applicable:***
Enter narrative response here.