



City of
San Bernardino
California

DRAFT HOME-ARP Allocation Plan

FEBRUARY 3, 2023

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City of
San Bernardino
California

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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 selected relevant service providers in the area that are best suited to provide detailed information on the service provision landscape for each qualifying population throughout the City. Each group was consulted using a uniform set of interview questions, discussing needs for all qualifying populations. The wide range of groups included fair housing groups, public housing agencies, veterans’ groups, domestic violence groups, public organizations addressing the needs of qualifying populations, and organizations addressing fair housing, civil rights, and the needs of persons with disabilities.

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

Agency/Org Consulted	Type of Agency/Org	Qualifying Population Served	Method of Consultation	Feedback
Celebration City Community Development	Private Agency	All	Interview	See Summary.
Lutheran Social Services Southern California	Homeless Services	All	Interview	See Summary.
Partners Against Violence	Domestic Violence	All	Interview	See Summary.
Step Up on Second	Homeless Services, Agency that Addresses Fair Housing/Civil Rights/Persons with Disability	Homeless, At-Risk of Homelessness	Interview	See Summary.
Reentry Community and Housing Supportive	Fair Housing, Homeless Services	Homeless, At-Risk of Homelessness, Other	Interview	See Summary.

Services		Populations		
City of San Bernardino	Public Agency	All	Interview	See Summary.
Deborah Robertson Foundation	Private Agency	???	Interview	See Summary.
City of San Bernardino Police	Public Agency	Homeless, Victims of Domestic Violence	Interview	See Summary.
San Bernardino County Continuum of Care	Continuum of Care	All	Interview	See Summary.
	Veterans' Group		Interview	See Summary.
	Public Housing Authority		Interview	See Summary.

Consultations Summary

Interviews were conducted with service providers throughout the City using a uniform question set. The goal was to establish characteristics, needs, and gaps for the City's current qualifying populations.

When asked to rank the needs of qualifying populations, the top choice across all interviews was tied between non-profit operating funding and non-profit capacity building. This was closely followed by supportive services. These needs helped to guide this allocation. The least common choice of need for all interviews was Tenant-Based Rental Assistance (TBRA).

The most commonly cited gap within service provision or housing inventory was found to be the lack of shelter beds. This common acknowledgement heavily aligns with forthcoming data in the Needs Assessment and Gap Analysis, which shows a large gap in shelter resources. Almost 97% of the City's homeless are thus unsheltered. A few other gaps that were commonly cited were also related to this issue, including Lack of Low-Barrier, Non-Congregate Shelters for Individuals and Families, and Lack of Housing/Homeless Prevention Programs.

The top three priority needs specifically for supportive services, according to respondents, were Drug Abuse/Addiction Services, Mental Health Services, and Life Skills Training. Once again, this adds strength to data in the following section, which shows that of the 989 homeless individuals in the City, 831 struggle with a disability or health condition, including mental health disabilities and substance use disabilities, among others.

Organizations that were consulted indicated a rate of 62% likelihood to apply for Homeless Prevention Services Funding, but they were less favorable for housing counseling, which had a 46% likelihood to apply for Housing Counseling Funding. All organizations except for 3 said

housing counseling services such as housing search, landlord/tenant rights, budgeting, and credit education/repair programs have a significant impact on the community. One organization indicated No, and two others indicated that they were Not Sure. Organizations stated that help is needed from foundations and individual donors to help fill fundraising gaps that grants may not cover, and they stated a need for transitional housing.

When asked about what sorts of projects would benefit the City, respondents most commonly said emergency housing was needed, but also that street outreach programs and engagement teams may be useful for the City.

For consultation results on each Qualifying Population, see the summaries below:

Homeless as defined in 24 CFR 91.5

Nearly half of all consultations (46%) dealt directly with self-identified Homeless Service Providers, but the needs of this population were present in all consultations. Specifically, consultations pointed towards an additional need of support across shelter and housing programs. Lack of low-barrier shelters, and lack of shelters beds were two of the top three identified largest gaps for all consultations

At Risk of Homelessness as defined in 24 CFR 91.5

Homelessness Prevention Services were the second most identified priority need for qualifying populations across all consultations, trailing behind Lack of Shelters, and 52% indicated they would be looking to apply for additional Homeless Prevention Services funding to fill existing gaps in capacity. This would help extend the existing shelter programs and provide additional services. These findings helped identify the shelter program as a recipient of this allocation.

Additionally, 90+% of consultations saw organizations state that housing counseling services have a significant impact on our community. This specifically includes services such as housing search, landlord/tenant rights, budgeting, and credit education/repair programs.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

When consultations shifted to identifying needs for specific supportive services, drug abuse/addiction services and mental health services wer the most commonly cited response. Additionally, domestic violence services was cited as a top five need for supportive services.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

Drug Abuse/Addiction Services were the most commonly cited need for supportive services while Life Skills Training and services for Persons with Disabilities were commonly cited need for supportive services across all consultations.

Additional Notes:

Veterans agencies in the San Bernardino City area and Housing Authority of the County of San Bernardino have been contacted numerous times to participate in consultations, but the City has yet to receive a response.

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, \$5,058,437

The range of activities the PJ may undertake: Development of Non-Congregate Shelter

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:

San Bernardino conducted wide stakeholder interview and survey process with the primary consultation groups as well as other social service and interested organizations. Thirteen stakeholders participated in a survey process. Public meeting and comment period are as follows:

- Public comment period: February 6, 2023 to Tuesday March 7, 2023
- Public hearing: March 15, 2023

Describe any efforts to broaden public participation:

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. Public meetings were held with stakeholders, online survey and public comment in area newspapers and final public hearing.

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

The public comment period and public hearing are yet to be held.

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

All comments were accepted.

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.

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory (County)					Homeless Population (City)				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	282	90	448	-	0								
Transitional Housing	199	60	153	-	15								
Permanent Supportive Housing	714	240	977	-	776								
Other Permanent Housing									-				
Sheltered Homeless						-	32	-	-				
Unsheltered Homeless							989	166	166				
Current Gap										-	-	811	-

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

Housing Needs Inventory and Gap Analysis Table

Non-Homeless (City)			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	31,175		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	3,105		
Rental Units Affordable to HH at 50% AMI (Other Populations)	8,530		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		8,295	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3,385	
Current Gaps			8,635

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:

Homeless as defined in 24 CFR 91.5

As identified in the 2022 Point In Time report prepared by the San Bernardino County Homeless Partnership, a total of 1,021 unhoused individuals lived in the City of San Bernardino. Of the 1,025 unhoused, 989 were unsheltered (96.9 percent) and 32 were sheltered (3.1 percent). Unsheltered homeless are individuals or families not housed in a shelter and whose primary nighttime residence is public/private place not designed for or ordinarily used as a regular sleeping accommodation for human beings. These are people living on the street or in makeshift shelters (tents, boxes), motorhomes (RV), vans, or cars. Sheltered homeless are individuals or families living in a supervised operated shelter to provide temporary living arrangement.

Of the 989 unsheltered homeless in the City, volunteers were able to administer 537 surveys for additional information. This included demographic data and other important subpopulation information.

Overall, 69.3 percent of individuals were male while 30.0 percent were female. The most common races were White (48.2 percent), Black or African American (24.4 percent) and Multiple Races (17.1 percent). In total, 39.1 percent of individuals were Hispanic or Latino. For age distribution, the most common age bracket was 25-39 (37.8 percent), followed by 40-49 (21.6 percent) and 55-61 (14.2 percent). Seniors (62+) represented 10.4 percent of the homeless population.

One-hundred forty-four (144) individuals became homeless for the first time during the past 12 months (26.8 percent). Additionally, disabilities are a common issue within the population. Specifically, 57.9 percent indicated a substance use problem disability, 44.1 percent indicated a mental health disability, 23.8 percent indicated a physical disability, and 11.9 percent indicated developmental disability.

Other data points showed that 59 percent of those surveyed were Chronically Homeless. Also, 16.9 percent have a chronic health condition that is life threatening such as heart, lung, liver, kidney, or cancerous disease. And finally, there were 5.6 percent of individuals that were Veterans, 3.5 percent of individuals have HIV/AIDS, and 21 percent were released from a correctional institution withing the past year.

At Risk of Homelessness as defined in 24 CFR 91.5

As shown above in the Housing Needs Inventory and Gap Analysis Non-Homeless Table, there are significant totals of at-risk homeless within San Bernardino. First, there are a total of 3,105 occupied or for-sale rental units within the City that are affordable for households making 0-30% AMI. However, there are 10,495 renters in the City in this income bracket. That creates a gap of 7,390 households that will struggle to find housing that is affordable within this income group, which is defined as at-risk of homelessness. Additionally, there are 5,425 occupied or for-sale rental units within the City that are affordable for households making 30-50% AMI. However,

there are 6,670 renters in the City in this income bracket. That creates a gap of 1,245 households that will struggle to find housing that is affordable within this income group. The total of both income groups creates a total gap of 8,635 affordable units.

There is also data indicating severe housing problems for renters within these groups, which puts some households at the risk of homelessness. Of these 10,495 renters in the 0-30% income group, 79.0 percent experience a severe housing problem, such as severe housing cost burden of 50%. Additionally, there are 6,670 renters in the 30-50% income group, and 50.7 percent of these renters experience a severe housing problem. For San Bernardino, households in these groups are more likely to be at-risk-of-homelessness.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

The Point in Time count report specified 36 individuals that were victims of domestic violence within the County, and there were 36 of these individuals specifically in the City of San Bernardino. This population has increased since 2020.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

As described in San Bernardino's Consolidated Plan, supportive housing services are needed for the City's elderly (26,174 individuals, 11.9% of the City population), persons with disabilities (26,498 individuals, 12.5% of the City population), developmentally disabled persons, veterans (6,062 individuals, 3.8% of the City population), persons with addictions, and those living with HIV/AIDS. Elderly persons may require long-term supportive housing that includes long-term assisted living, transportation, and nursing care. While many disabled persons can live and work independently within a conventional housing environment, more severely disabled individuals require a group living environment where supervision is provided. The most severely disabled individuals may require an institutional environment where medical attention and physical therapy are provided. Those suffering from substance abuse might require counseling or case management and a short-term housing solution while undergoing rehabilitation. Other more challenging or on-going conditions might require supportive services that include long-term assisted living, as well as transportation and nursing care. Persons with HIV are often able to live independently as advances in medical treatment enable persons with HIV to lead normal lives. However, persons living with AIDS may require long-term supportive housing as their health conditions deteriorate and impact their ability to work. The Point-in-Time count identified numerous individuals in these populations that were homeless within the City of San Bernardino, as stated previously. There were 30 homeless veterans in the City, in addition to 19 homeless HIV/AIDS individuals, and 831 individuals with either a physical disability, developmental disability, mental health disability, substance use disability, or a chronic life-threatening heart condition.

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:

While homelessness is a complex problem with many causes, the high cost of housing is a significant contributor. Rising housing costs that have exceeded growth in wages, particularly for low-income households, put San Bernardino residents at risk of housing instability and homelessness. To measure the number of homeless persons in San Bernardino, the City relies on point in time surveys prepared by the San Bernardino Homeless Partnership. Population estimates for people experiencing homelessness are difficult to quantify. Census information is often unreliable due to the difficulty of efficiently counting a population without permanent residences. Given this impediment, local estimates of the homeless and anecdotal information are often the source of population numbers. As stated earlier however, there is a population of 1,021 homeless individuals in San Bernardino as of the 2022 Point in Time Count, and a potential gap of affordability for 8,635 at-risk households. There is also an extremely high proportion of at-risk families (79%) that already experience severe housing problems. These populations are in the most unstable housing situations.

In addition to the at-risk population, there are gaps facing the existing homeless community. This is shown by the vast differences between the unsheltered and sheltered population within the City. As stated previously, there are 989 unsheltered in the City, opposed to only 32 sheltered. There is a lack of shelter beds for these individuals in the City.

There also appears to be a lack of space in the City to house other populations, including those with disability, those fleeing from domestic violence, and veterans. In the City alone, there are 36 unhoused victims of domestic violence, 30 veterans, and 831 disabled/health condition individuals. This shows the gaps in the shelter network, and a lack of services for these individuals.

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:

The City of San Bernardino assists homeless populations through funding supportive service providers in the community. The City has traditionally provided funding through the ESG program to support services that include emergency shelter, rapid rehousing, homelessness prevention, street outreach, and HMIS costs.

According to the City's Consolidated Plan, many organizations in San Bernardino, including businesses, civic groups, corporations, educational institutions, faith-based organizations, local government, and nonprofit agencies, provide financial assistance, food, health care, clothing, legal

assistance, public assistance, rental assistance, and utility assistance at little or no cost. Mainstream benefit programs such as CalFresh, Medicaid/Medi-Cal, Social Security Disability Income (SSDI), Supplemental Security Income (SSI), and Veteran's Benefits are available to homeless persons in the City.

Additionally, the Homeless Provider Network (HPN) acts as an advocate for homeless populations and those at risk of becoming homeless. The HPN facilitates the collaboration between the public and private sectors to coordinate services to assist and prevent homelessness. Member organizations of the HPN meet monthly.

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The City works with various agencies and provides referrals for services to homeless populations and those at risk of homelessness:

- Community Action Partnership of San Bernardino County – provides homeless persons and those at risk of homelessness with temporary rental assistance, financial literacy education, and linkages to other support services.
- Family Service Association of Redlands – provides emergency shelter (motel vouchers), wraparound services, and case management to prevent homelessness.
- Lutheran Social Services – provides emergency shelter as a "bridge" to permanent housing, and wrap-around services to help homeless men 18 years and older to achieve self-sufficiency.
- Step Up on Second – provides supportive services which begin with engagement and street outreach activities.
- The Salvation Army Hospitality House – provides emergency shelter, referrals to permanent housing services, and meals to families and single females experiencing homelessness.
- Other agencies in the County providing services to address homelessness include:
 - Catholic Charities San Bernardino
 - High Desert Homeless Services, Inc.
 - Victor Valley Family Resource Center

Time for Change Foundation provides emergency shelter services to women and children as well as permanent housing. Helping Hands Pantry, a food bank, serves the communities of the County of San Bernardino; programs include a mobile food pantry and the College Student Food Assistance Program for students who do not have the resources to buy enough food.

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

As shown in the Housing Needs Inventory and Gap Analysis Homeless Table, there is a lack of Emergency Shelter, Transitional Housing, and Permanent Supportive Housing in the City. Within this area, there are only 45 emergency shelter beds, transitional housing beds, and Permanent Supportive Housing beds within this area despite there being 989 unsheltered homeless. This leaves a gap of 957 beds for individuals. As stated in the other Non-Homeless Table, there is a gap of affordable housing options for 8,635 households.

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:

These populations would include Seniors, Large Families, Persons with Disabilities, Veterans, Victims of Domestic Violence, Persons with HIV/AIDS, and Single Parents. These populations align with characteristics of housing need, as identified by the Consolidated Plan, including but not limited to:

Seniors – Due to their fixed incomes, increasing medical needs and mobility challenges, seniors require accessible housing in close proximity to healthcare facilities and ease of transit. Seniors also need rehabilitation services to maintain and improve the condition of their housing. Additionally, seniors often need rental assistance through housing vouchers due to their fixed incomes.

Disabled - Disabled individuals would require not only housing assistance in the form of rental and mortgage subsidies, but also group housing with accessibility features that would be ideal for people with mobility issues and sensory limitations. Their housing needs will also require ease of access to transit, shopping and healthcare facilities. They may also require specialized medical care and education, especially for the developmentally disabled. Additionally, disabled individuals who have been discharged from medical/healthcare facilities might also need transitional housing.

Large Families and Families with Female Heads of Households - Large families need low-cost housing that require a minimum of 3 bedrooms to accommodate all members in the home sufficiently. Families with Female Heads of Households may not only require affordable housing assistance, but those with children also need accessibility to healthcare facilities and educational institutions. Child Care assistance for those who are not of school-going age may also be required. These same needs may also apply to large families

Identify priority needs for qualifying populations:

The Consolidated Plan highlights current needs for qualifying populations and needs for the entire City. This includes identified priority needs to:

- Preserve and Rehabilitate Housing

- Expand Homeownership
- Provide Homeless and Homeless Prevention Services
- Create New Affordable Rental Housing
- Promote Economic Development (Micro-Enterprise)
- Improve Facilities and Infrastructure
- Pursue Fair Housing

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:

These gaps were determined from data provided by Point in Time Counts, Housing Inventory Counts, American Community Survey (ACS) Data, and Comprehensive Housing Affordability Strategy (CHAS) Data. The first two sources showed the existing homeless populations, and the existing housing they may access. The next two data sources identified additional populations based on income and housing problems. These populations are at high risk of becoming homeless. There is a need for housing inventory and service systems to account for these at-risk populations as well, to avoid becoming overrun.

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 of San Bernardino intends to work with operators to design, construct, and operate a shelter and navigation center to be located in the City.

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			
Acquisition and Development of Non-Congregate Shelters	\$4,299,672		
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing			
Non-Profit Operating		%	5%
Non-Profit Capacity Building		%	5%
Administration and Planning	\$758,765	%	15%
Total HOME ARP Allocation	\$5,058,437		

Additional narrative, if applicable:

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 San Bernardino intends to allocate its HOME-ARP funds evenly to one activity:

- 1) Non-Congregate Shelter and Navigation Center (\$4,299,672)

The city owns a 2.48 acre property that will be adaptively reused and converted for a non-congregate homeless shelter that will include space for needed homeless and homeless prevention services. The City intends to competitively bid through an RFP process the project’s design planning and engineering, and construction. The City also intends to interview area social services and shelter operators to find a qualified operator for the shelter. The Navigation Center will include space for a variety of operation needs and needed services:

- Identification documentation, mailbox, storage locker, and pet kennel area
- Income stabilization guidance
- Job training/placement workstation and training area
- Office space for mental health services, substance abuse recovery, case management, and housing navigation

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:

Not Applicable

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:

Not Applicable

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:

Existing Coordinated Entry System (CES) preferences will be used, pursuant to the operator's current waiting list.

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:

The preference of CES is consistent with the Needs Assessment and Gap Analysis, this will help fill the gap of shelter beds in the City.

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:

The Plan is also supporting navigation services that will be open to all qualifying populations to help fill gaps and unmet needs. The property operations shall work in tandem with the Continuum of Care and the Coordinated Entry System to with regards to case selection.

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. 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

Not Applicable

- 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.

Not Applicable

- Other requirements in the PJ's guidelines, if applicable:
Not Applicable