



CITY OF TACOMA COMMUNITY
AND ECONOMIC DEVELOPMENT

Tacoma-Lakewood HOME Consortium
Draft HOME ARP Allocation Plan
July 2022

INTRODUCTION

The Draft Tacoma-Lakewood Consortium's HOME ARP Allocation Plan incorporates supplemental federal grant funds as an amendment to the 2021-2022 Annual Action Plan.

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Executive Summary

In spring of 2021, the US Department of Housing and Urban Development announced the allocation of \$5 billion in supplemental HOME Investment Partnership funds provided through the American Rescue Plan (HOME ARP). Through the program, the Tacoma-Lakewood HOME Consortium (the Consortium) received \$5,110,825 to create housing, rental assistance, shelter, and services for the benefit of people experiencing homelessness or at risk of homelessness. HOME ARP funds will be incorporated as a substantial amendment to the Consortium's 2021-2022 Annual Action Plan.

To access the Consortium's grants, the City of Tacoma, as lead entity of the Consortium, engaged in a joint consultation process with Pierce County to develop the required HOME ARP Allocation Plan (Plan). In addition to a summary of input received through the consultation process, the Plan provides an assessment of the regional homeless and housing systems existing resources, unmet needs, and strategic priorities for responding to homeless and at-risk populations.

The Plan also outlines the activities the Consortium will undertake using HOME ARP funds, the methods for distributing program dollars and ensuring compliance with the program's administrative requirements, and the proposed outcomes of spending activities.

Information gathered through the consultation and assessment process substantiated the following uses for the Consortium's HOME ARP allocation:

Tacoma-Lakewood Consortium's HOME-ARP Allocation	\$5,110,825
Uses	
Administration	\$500,000
Tacoma	
Production of Affordable Rental Housing	\$2,880,336
Supportive Services	\$555,000
Lakewood	
Production of Affordable Rental Housing	\$587,745
Tenant Based Rental Assistance	\$587,744
Total Uses	\$5,110,825

Through these activities, the Consortium proposes that it will:

- Create at least 74 units of permanent supportive housing and affordable housing
- Provide supportive services to households experiencing homelessness or who are at greatest risk of housing instability
- Provide tenant-based rental assistance to an estimated 13 households experiencing homelessness or who are at greatest risk of housing instability

Consultation

Summarize the consultation process

The Tacoma-Lakewood Consortium is situated within Pierce County, which also participates in the HOME program as the Pierce County Consortium of Cities and Towns. The two Consortiums coordinate with The Road Home Continuum of Care (CoC), Pierce County and Tacoma Public Housing Authorities, and other affordable housing and service providers that form the regional affordable housing and homelessness system.

The two Consortiums coordinated on a joint consultation process. By planning in coordination, staff were able to maximize the time of regional partners, leverage shared data and relationships, and develop an improved assessment of the system's existing resources and gaps.

Our joint consultation process was initiated by an engagement with the CoC. The CoC's broad membership encompasses organizations serving the following community stakeholder groups:

- Local government staff
- Tacoma-Pierce County Coalition to End Homelessness
- CDBG/HOME/ESG Entitlement Communities (Pierce County)
- Disability advocates
- Mental illness advocates
- Public Housing Authorities (Tacoma and Pierce County)
- Non CoC-funded youth homeless
- School administrative/homeless liaisons
- Non CoC-funded victim services
- Youth street outreach
- Survivors of human trafficking
- Homeless subpopulation advocate
- Pro bono legal services
- Youth homeless community representative
- Advocates and service providers for the lesbian, gay, bisexual, transgender, queer, questioning, two-spirit, and allied communities
- Workforce development
- Children's administration
- Coordinated entry
- City of Tacoma Office of Equity and Human Rights
- Higher education
- Tacoma Pierce County Health Department

The CoC's membership also represents organizations serving community members who are elderly, minorities, other-abled, and/or possess limited English proficiency.

The Consortia provided CoC members with a memo outlining details on the HOME ARP program, including eligible activities and populations to be served. Consortia staff visited a CoC meeting to engage in discussion and answer questions about the program.

Additional organizations serving qualified populations, including veteran's services, were contacted via email. The email included a memo outlining details on the HOME ARP program, eligible activities and populations to be served, and a survey link to submit additional input.

Consortia staff also engaged in interviews with staff from the Tacoma Housing Authority, Pierce County Housing Authority, the Pierce County Housing Authority, Pierce County Human Services, the Lived Experience Coalition, and Pierce County Veterans Services to collect additional data on housing voucher utilization rates, Coordinated Entry, and gaps in the services needs of qualified populations.

The Lakewood Community Collaboration, which brings local organizations and community members together monthly to identify and collectively tackle housing and human service issues related to our children, youth and families, invited Consortia staff to present the HOME ARP program at a regular meeting. A follow up email was sent to the group with a written memo describing the program and a link to a survey to provide input.

Further analysis of gaps and needs was completed by inventorying and engaging other planning processes shared between Pierce County and the Cities of Tacoma and Lakewood. Plans and data sources are listed below:

- Pierce County Housing Authority 2021 Streamlined Annual PHA Plan
- Tacoma Housing Authority 2022 Administrative Plan
- Pierce County Homeless Coalition Homeless Service Sites database
- Pierce County Human Services Coordinated Entry Manual
- City of Lakewood's 2022 Annual Housing Report to the Lakewood Planning Commission
- City of Tacoma's Housing Action Plan
- City of Tacoma's Affordable Housing Action Strategy
- Tacoma Lakewood HOME Consortium 2020-2024 Consolidated Plan
- Tacoma Lakewood HOME Consortium Analysis of Impediments to Fair Housing Choice (2020)
- Pierce County's Comprehensive Plan to End Homelessness (2022)
- Pierce County's Plan to Address Homelessness (2020)

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

Agency	Type of Agency/Organization	Method of Consultation	Feedback
The Road Home	Continuum of Care	Virtual presentation, discussion, emailed memo, and survey	Supports on-demand shelter. Other issues such as need for medical attention may prevent people from entering shelter, so services are needed. Service and shelter workers should have lived experience.
Tacoma Housing Authority	PHA	Interview	<p>Low vacancy rate in Tacoma creates higher rents, making the market challenging for voucher utilization. Other factors that make vouchers difficult to use are criminal backgrounds, costs of deposits and landlord fees.</p> <p>Service needs are diverse. There is a high need for project based vouchers but units take too long to come online for people on their waitlist who need housing now.</p> <p>Entry to accessing vouchers is not transparent or quickly accessed. Getting referrals for housing from Coordinated Entry is a positive, would like to see more movement in the direction of referrals from Coordinated Entry.</p> <p>Some services are available to stabilize at-risk residents, however more resources dedicated to upstream prevention of crisis are needed.</p> <p>Relationship building as a complement to services improves outcomes. Increasing social capital for populations served is fundamental to breaking poverty cycle. Some evidence-based practices that are recommended for service delivery</p>

			include trauma-informed care and motivational interviewing. Offering multi-generational service programs is also a successful approach.
Pierce County Housing Authority	PHA	Interview and Survey	<p>Higher rents make vouchers difficult to use. The PHA is looking at RAD conversion to increase vouchers and tap into a wider variety of financing sources, raising their current \$30-50 million financial leverage to \$300- 500 million with other programs including LIHTC and bonds.</p> <p>There are challenges to finding equal size units to support relocation needs. They are seeing a high need for one-bedroom, ground floor ADA units.</p> <p>There is not enough funding for services. Addiction is a housing barrier that they see most frequently. There is a bottleneck for people exiting homelessness because there aren't enough housing units. Co-locating services onsite with housing is important.</p> <p>PCHA currently has 2617 households under the HCV program, which includes VASH, NED, Tenant Protection, EHV, Homeownership and Project Based vouchers. PCHA has 124 Public Housing single family scattered site homes, and 648 market rate unit. They have over 8,000 on HCV waitlist and 1000 on Public Housing, both last opened in 2018.</p> <p>Low vacancy rates and high rents are barriers to utilization. Mental health services to accompany housing is needed.</p>

			<p>PCHA is prioritizing family self-sufficiency for new resources. Populations with mental health and substance abuse issues have needs that should be considered. Of their total 2946 vouchers, PCHA is only able to use 2600 due to the cost of contract rents and a success rate of 58% of voucher holders being able to find a unit they can afford.</p>
Rise Center of Hilltop	<p>Nonprofit serving members of all qualified populations, including individuals with disabilities groups and protected under fair housing and civil rights</p>	Survey	<p>There is a gap in cohesive, supportive services. Complete individualized services are needed for the populations served. Programs need to be able to help navigate and assist with educational services. Reach out to smaller nonprofits who are disadvantaged for competition.</p>
Tacomaprobono Community Lawyers	<p>Nonprofit serving members of all qualified populations, including individuals with disabilities and groups protected under fair housing and civil rights</p>	Survey	<p>Tacomaprobono had nearly 4000 applicants for assistance with housing issues in the last, twelve-month period. Of those, they were only able to serve 1,840 and have a waiting list of roughly 200 applicants.</p> <p>There is a lack of access to legal representation and education about rights and procedures. Also a gap in services navigating the legal system to remove barriers to finding housing.</p> <p>The organization sees a need for more resources dedicated to homelessness prevention. Groups who have specific needs are survivors of domestic violence, individuals experiencing mental health issues, and those with criminal histories.</p>

			The organization’s priorities are addressing time sensitive need for legal services and representation for domestic violence survivors, homelessness prevention, removing barriers to accessing housing for all qualified populations by increasing landlord-tenant legal services and clinical programs to waive/reduce legal financial obligations and remove past evictions and criminal records.
Elevate Health	Accountable Communities of Health (ACH) organization serving members of all qualified populations, including individuals with disabilities and protected under fair housing and civil rights	Survey	There are not enough homeless shelters in Pierce County. There are some populations who do not feel safe in congregate shelter. Onsite mental health support staff at shelters would be beneficial along with access to health care. Young adults in particular struggle because they do not qualify for affordable housing programs and do not meet income requirements of making three times the rent for housing. New resources are needed to support young adults seeking housing. Additional data on the size and needs of this population is needed. Mobile services that travel to homeless shelters are needed.
City of Tacoma Human Rights Commission	Public Agency serving populations who are at-risk of homelessness, are previously homeless, who are at-risk of housing instability, who are protected under fair housing and civil rights, and individuals with disabilities. Reviews fair	Survey	There is not enough affordable housing. Housing is needed that accommodates individuals with intellectual and emotional disabilities.

	housing complaints in support of the City of Tacoma’s Civil Rights Investigations program.		
YWCA Pierce County	Nonprofit serving individuals fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.	Survey	<p>In FY 21, YWCA served 118 households in their emergency shelter as well as 1594 clients through service provision. They responded to 5,123 hotline calls from individuals fleeing DV.</p> <p>40% of clients are in Tacoma, 9% are in Lakewood, and 20% are from Pierce County. 30% experience a disability and 87% are considered low- or very low-income.</p> <p>There is not enough non-congregate shelter for domestic violence/sexual assault survivors. YWCA’s most recently completed housing development has over 300 people on the waitlist.</p> <p>Housing for people at or below 30% AMI is needed as well as permanent supportive housing. It is difficult for people to move from shelter to housing because of the limited options for those who have no income. Many people call seeking long-term housing and rental assistance as well as counseling and support groups for domestic violence survivors.</p> <p>There is a need for more continuous funding streams that build capacity beyond one-year funding. Homelessness prevention and mental health services are needed.</p>

<p>City of Tacoma Office of Equity and Human Rights</p>	<p>Public Agency serving populations who are at-risk of homelessness, are previously homeless, who are at-risk of housing instability, who are protected under fair housing and civil rights, individuals with disabilities, and individuals who are fleeing domestic violence, who are veterans or families of veterans</p>	<p>Survey, Interview</p>	<p>There is a lack of housing designed and planned for people with disabilities. More data is needed to show how BIPOC clients are being served throughout the housing continuum.</p> <p>More resources need to be dedicated to build lived experience into planning and evaluation of design and programming. Groups who have particular needs include non-English speaking community members, individuals who are neurodivergent, and individuals who are deaf, blind or in a wheelchair.</p> <p>LGBTQAI individuals and families are in need of safe communities where they will not be targeted.</p> <p>People living with disabilities and experiencing homelessness may be turned away from shelter. While this is not legal, people surviving in homelessness lack the agency and resources to follow up and seek enforcement of accessibility laws.</p>
<p>Policy Analyst, Tacoma Pierce County Coalition to End Homelessness</p>	<p>Coalition of multiple organization serving members of all qualified populations, including individuals with disabilities and protected under fair housing and civil rights</p>	<p>Survey</p>	<p>Funds should support things that can come online quickly, that align with the Pierce County Comprehensive Plan to End Homelessness. Identify projects that strengthen inter-jurisdictional bonds, for example Aspen Court.</p>

<p>City of Tacoma, Landlord Tenant Liaison Program</p>	<p>Public agency serving members of all qualified populations, including individuals with disabilities and protected under fair housing and civil rights</p>	<p>Survey</p>	<p>Not enough affordable housing. People are forced to live in dwellings that are not legal. People are facing unreasonable rental increases. Those who are priced out or have been unlawfully evicted are now couch surfing or living on the streets. Seniors, tenants with disabilities and language barriers and/or those who do not have internet access.</p>
<p>Tacoma Urban League</p>	<p>Non profit serving populations who are at-risk of homelessness, are previously homeless, who are at-risk of housing instability, who are protected under fair housing and civil rights</p>	<p>Survey</p>	<p>There is not enough affordable housing, not enough resources for LGBTQ individuals experiencing homelessness, transportation barriers to accessing services, lack of consistency in follow up from service providers, challenges to maintaining documents required for obtaining housing. There is a need for homeless prevention services, ie foreclosure prevention, credit and budget workshops, other steps prior to homeless intervention.</p>
<p>Pierce County Veterans Programs</p>	<p>Public agency serving members of all qualified populations, including individuals with disabilities and protected under fair housing and civil rights</p>	<p>Survey and Interview</p>	<p>VASH voucher utilization is a huge gap caused by lack of affordable housing, high rents, lack of willingness by landlords/property managers to use VASH vouchers, property development plans not including veterans, and VA staffing issues for case managers. There is a constraint on shelter space in part due to lack of housing to transition to. There is a need for expansion of shelter space for veterans, specifically for female, LGBTQ, and underserved veteran populations. Veterans with mental health and addiction issues avoid existing congregate shelters. LGBTQ and female veterans don't have sites built specifically for their needs. Recommendations from the End Veterans Homelessness</p>

			<p>Task Force include expansion of shelter space, permanent supportive housing, and affordable housing.</p> <p>Many veterans will not disclose their status when engaging with the homelessness system. Reasons for this include: 1) they already have the resources; 2) they had a negative experience with the military and do not want to be associated; and 3) they feel that the conversation will end with veteran resources and other relevant resources will be overlooked.</p> <p>Specific needs mentioned to support the veterans seeking shelter and housing were storage, allowing for pets, and accommodating families and couples.</p> <p>Capacity is a challenge overall for assigning veterans to housing programs. The resulting assignment rate is around 32%. Lack of capacity was also mentioned in relation to the housing supply – while new units dedicated to veterans may be brought online, a lack of capacity to provide services may result in a decrease in units at other existing sites.</p> <p>Voucher utilization remains low and is a challenge due to the gap between fair market rents and actual contract rents.</p> <p>The average length of stay for veterans served by shelters between January and June of 2022 was approximately 74 days, with certain outliers remaining in shelters for between 140 and 860+ days.</p> <p>More units of shelter and housing dedicated to veterans are needed. The presence of Joint Base Lewis McChord creates</p>
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			additional pressure on the existing inventory of affordable housing units.
Forward Operating Base (FOB) Hope	Nonprofit organization providing outreach and shelter to populations who are homeless; At-risk of homelessness; Populations who are at great risk of housing instability; Veterans and families that include a veteran family member who meet any of the above criteria;	Survey	There is a gap in affordable housing. Communities served by FOB Hope have particular need for re-establishing social skills and addressing mental health issues. Currently the organization is working on offering a pilot program for homeless veterans and opening a Veterans Village that includes transitional housing.
Associated Ministries	Nonprofit organization serving populations who are Homeless; At-risk of homelessness; Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; Populations who are at great risk of housing instability; Previously homeless populations who require services or housing	Survey	<p>There are many disabled homeless individuals who are unable to increase their income and who have difficulty maintaining housing due to a traumatic, disabling event. More shared housing would help, however even then social security does not cover rents.</p> <p>Resources for long-term medical care are needed.</p> <p>There is a lack of entry level career positions for young adults. The options available require taking on student debt. There needs to be more low-barrier to entry jobs for youth that pay a fair wage.</p>

	<p>assistance to prevent homelessness</p>		<p>Criminal histories are a barrier for shared housing. People with recent convictions for drugs and violent crimes, sex offenders, are more at risk of homelessness.</p> <p>There is not enough access to mental health institutions. Lack of rental and/or credit history for people exiting institutions prevents people from accessing housing.</p> <p>There is a high need for resources to support people escaping intimate partner violence. More resources are needed for support staff to be trained and provide assistance on escaping intimate partner violence.</p> <p>The organization is seeking more resources to scale up shared housing programs and housing stabilization/homelessness prevention services. The housing market is such that it is taking more than 90 days to connect people with housing, longer if they have multiple barriers. People with eviction histories are struggling. Methods that worked in the past – landlord-tenant relationship building, financial subsidies, long-term emotional engagement with clients – are not as effective now. The gap is housing, especially low-barrier housing options.</p>
<p>Lived Experience Coalition</p>	<p>Grassroots Black, Indigenous, People of Color (BIPOC) group with advocates who have lived experience in homelessness.</p>	<p>Emailed memo, virtual discussion</p>	<p>Members expressed the need for services that foster independence for end users. Services surrounding skill building, mental health, physical health, and productive activities were emphasized.</p> <p>People who are exiting homelessness benefit services that support them in remaining housed, including housing</p>

			<p>counseling and budget counseling. Service delivery is more impactful when it is provided through peer navigators. Peer navigation allows for wider representation of communities who are experiencing homelessness among frontline workers. People who have lived experience with the complicated homeless system are better able to navigate not only the resources available, but also the needs of end users.</p> <p>Around 70% of people experiencing homelessness also have a disability. This population faces unique barriers to accessing existing services. For example, when pursuing disability benefits, people are earmarked for HEN benefits, which disqualifies them for any housing programs or interventions offered through the homeless system and Continuum of Care. Additionally, HEN vouchers are not a flexible income source, they only cover rent and their value is not enough to supplement current contract rents. This population also faces barriers to accessing existing shelters that may not be ADA compliant.</p> <p>Existing shelters are gender binary and may not be safe for populations who are homeless and also part of the LGBTQ community.</p> <p>Interest was also expressed that the money be used in support of a community land trust.</p>
Fair Housing Center of Washington	Public agency providing education on policies to	Email	The City requires recipients of ARP funds to demonstrate/ provide a copy of their affirmative marketing plan to ensure projects for new/rehab construction are being marketed to

	prevent and address issues of housing discrimination.		<p>those who would not normally be aware of such housing opportunities. This would strengthen the city's commitment to affirmatively further fair housing as part of the Analysis of Impediments to Fair Housing Choice goals, and as a recipient of HUD funds.</p> <p>That all recipients of ARP funds can show when their staff last received fair housing training (should be within the last year) or a requirement that all key employees receive fair housing training within 90 days or something to that effect.</p> <p>That housing counseling agencies who receive ARP funds demonstrate that their curriculum covers some element of fair housing and the appropriate fair housing resources (City of Tacoma, Fair Housing Center of Washington, Washington State Human Rights Commission) if their clients feel they are being discriminated against or treated unfairly at any point in their homebuying journey.</p> <p>The latest Analysis of Impediments to Fair Housing Choice report for Tacoma and Lakewood show a disappointing level of awareness about fair housing laws and available resources among residents, and so these are just a few of the ways that we can address this.</p>
City of Lakewood + Living Access Support Alliance		Meeting	<p>There remains a large need for affordable housing, both in transitional and permanent housing. As funding has shifted away from transitional and shelter-type housing in favor of permanent supportive housing and centralized intake, a gap in need for these types of housing has been created. Additional unmet need remains in the form of services to homeless individuals, including</p>

			access to health care, hygiene, laundry facilities, and transportation issues.
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Summarize the feedback received and results of upfront consultation with these entities

The Tacoma-Lakewood HOME Consortium and Pierce County Consortium of Cities and Towns coordinated early on a joint consultation process. By planning in coordination, staff were able to maximize the time of regional partners, leverage shared data and relationships, and develop an improved assessment of the system's existing resources and gaps.

One of the needs we heard was for services to support qualified populations experiencing mental illness and/or substance abuse. Pierce County and City of Tacoma have implemented the collection of a 1/10th of one percent sales tax under RCW 82.14.460, which raises millions annually dedicated to substance abuse use disorder and mental health treatment programs.

There is an urgent need to provide a variety of clean, safe shelter types to residents of encampments throughout the Consortiums. The City of Tacoma currently contracts with experienced providers to operate three emergency micro shelters, a hotel converted to an enhanced shelter with wraparound services, and two sanctioned encampments with basic security and services, including hygiene and sleeping accommodations. These six locations provide nearly 300 shelter units serving individuals and families. The City of Tacoma continues to explore potential locations to align its shelter capacity with demand outlined in the CoC's shelter plan.

Pierce County is currently seeking a developer and service provider for its Community First Village, which will develop a minimum of 150 units of supportive housing for chronically homeless people. It has also made \$1,000,000 available for a Shelter Access Hub that will allow on-demand shelter, transportation, and navigation for households experiencing homelessness.

Lakewood both receive revenues from a dedicated affordable housing source, HB 1406. The City of Tacoma receives \$853,000 each year, \$17 million over a 20 year period that began in 2019. The City of The City of Lakewood anticipates \$1.95 million over next 20 years. These resources will be leveraged with other public and private dollars to support affordable housing development.

Additional funds from the Washington State Department of Commerce will be made available to several counties, to support the acquisition, renovation, leasing, operations, maintenance, and associated services for a range of shelter and housing types. \$30,255,488 will be made available to support increased shelter and housing capacity throughout Pierce County in 2022 and 2023. It is anticipated that an additional 318 shelter beds will be created from this additional funding.

The following amounts are currently being proposed to implement the CoC's Comprehensive Plan to End Homelessness in response to systemic needs:

- Coordinated Entry Academy: \$200,000
- Homeless Prevention Case Management Pilot: \$2 million
- New Emergency Shelter in underserved geographic areas \$3.2 million
- Shelter Access Hub: \$1 million
- Technical support for BIPOC, LGBTQAI, Latinx, and Asian Community Service Providers: \$200,000

- Workforce Development for People Experiencing Homelessness: \$300,000

Through the consultation process, it was expressed that there are unmet needs to support individuals in their path to housing stability. Some service needs that were emphasized were preparation for receiving housing, *i.e.* organizing documents, securing identification and bank accounts, etc., and support for mental health and addiction issues.

It was emphasized repeatedly that no amount of transitional services will support qualified populations if there are no affordable housing units. We learned that there is especially a demand for permanent supportive housing units. New permanent supportive housing units will provide a destination for households exiting temporary shelter or who face housing instability due to a fixed income and need for services to support them in staying housed.

Finally, it was emphasized that the co-design of housing, shelter, and services programming with people who have lived experience improves outcomes by increasing end users' social and skills capital. It is important that housing and services providers are trained in Fair Housing and Equal Access Rules to ensure that households seeking housing, shelter, and services are not discriminated based on protected classes, or gender identity and sexual preference.

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

- Public comment period: July 8, 2022 – July 25, 2022
- Public hearing: July 12, 2022

The fifteen-day period for examination and review of the HOME ARP Allocation plan begins on July 8, 2022 and ends on July 25, 2022. Written comment is accepted during this time. In addition, a public hearing is held during a regularly scheduled City Council meeting on July 12, 2022, during which verbal comment was accepted. The City provides public notice on July 5, 2022, in the Legal section of the Tacoma publication The News Tribune for print and online viewing.

Due to the pandemic, draft copies of the HOME ARP Allocation plan are not available for in-person viewing and instead will be offered via post upon request and the plan is posted on the City's website. Public comments were documented and submitted with the plan, along with an explanation of whether or not they were incorporated into the plan.

<Insert screenshot of news ad>

Describe any efforts to broaden public participation

A copy of the public notice outlining opportunities to comment on the plan is shared via email with partner agencies, including agencies serving residents who are low income, elderly, other-abled, youth, or have limited-English proficiency. Partners who participated in the Consultation process were also invited to comment on the draft plan.

Instructions for requesting accommodations during the public hearing were included in our public notice announcing the public review and comment period. The draft plan was published in PDF format, which is accessible for people using screen readers. The City of Tacoma’s website is American Disabilities Act-compliant and is translatable into nearly 100 languages.

Summarize the comments and recommendations received through the public participation process

This section will be updated at the close of the fifteen day review and comment period.

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

This section will be updated at the close of the fifteen day review and comment period.

Needs Assessment and Gaps Analysis

Homeless Needs Inventory and Gap Analysis Table

	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	409	146	794	722	30								
Transitional Housing	68	28	22	22	71								
Permanent Supportive Housing	472	147	575	544	35								
Other Permanent Housing													
Sheltered Homeless						134	743	118	40				
Unsheltered Homeless						220	928	167	233				
Current Gap										1502	453	1175	1095

Narrative

Data in the above Homeless Needs Inventory and Gap Analysis Table reflects Pierce County regional data from the Homeless Management Informational System (HMIS) extracted in May 2022. We selected regional data to support Pierce County’s efforts to design a Unified Regional Approach to achieving Functional Zero Homelessness.

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

- 1) Homeless as defined in 24 CFR 91.5 Homeless (1), (2), or (3)
 - a) 2,382 individuals (HMIS, extracted May 2022)
 - b) The Supporting Partnerships for Anti-Racist Communities (SPARC) Report indicates that that, as of 2018:
 - i) Black/African American people represent the HMIS population at a rate of 26.3%, despite only making up 6.6% of the general population in this area;
 - ii) At the time of exit from the HMIS system, clients identifying as male were almost four times more likely to exit a project into homelessness than were females;
 - iii) Clients with a disabling condition were 64% less likely to become homeless after exiting the HMIS system;

- iv) Clients who were veterans were over three times more likely to obtain permanent housing with a subsidy after exiting the project and almost three times more likely to obtain permanent housing without a subsidy;
 - v) Being Black/African American was not a significant predictor of exiting the HMIS system into homelessness; however, Black/African Americans were statistically significantly more likely to exit into permanent housing with or without a subsidy than were Whites, with an increased likelihood of 19% and 18%, respectively.
 - vi) Individuals, families with children, unaccompanied youth and young adults
- 2) At risk of homelessness, as defined in 24 CFR 91.5 At risk of homelessness
- a) Comprehensive Housing Affordability Strategy (CHAS) data extracted March 2022 for Tacoma and Lakewood shows that 17,385 households earn 30% or less than the area median income for Pierce County, representing nearly 34% of the total population
 - b) Seniors at risk of homelessness
 - i) American Community Survey (ACS) data extracted June 2022 shows that approximately 36% of the Consortium’s population aged 45+ is at or below 30% AMI. While senior housing models generally serve households aged 55+, the age brackets available through ACS data begin at 45-65 years. Including this bracket shows the size of the current population aged 55+ that is at risk of homelessness and includes the growing portion of the population who are at risk of homelessness and will become age-eligible for 55+ affordable housing developments in the next decade.
- 3) Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD
- a) 443 individuals (HMIS data, extracted May 2022), nearly 20% of individuals registered in HMIS for the Consortium, were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or human trafficking, as defined by HUD.
- 4) Other populations where providing supportive services or assistance under section 212(a) of NAHA (42 USC 12742(a) would prevent the family’s homelessness or would serve those with greatest risk of housing instability
- a) One in five renters in the Consortium are at great risk of housing instability. 17% of Lakewood renters are at or below 30% AMI and pay more than 50% of their income on housing. 15% of Tacoma’s renters also meet that criteria (CHAS data, extracted March 2022)
 - b) Tacoma households experiencing the greatest risk of housing instability or in unstable housing situations are disproportionately impacted across race and ethnicity. 75% of Tacoma’s households at or below 30% area median income pay 50% or more per month on housing. Black households make up 10% of Tacoma’s population and represent 12% of cost-burdened households. Hispanic households make up 8% of the city’s total population but represent 10% of cost-burdened households. (City of Tacoma Affordable Housing Action Strategy, 2018)
 - c) Approximately 5% of Tacoma’s renters are seniors whose household income is at or below 50% and are paying more than 50% of their income on housing. Another 5% are at or below 30% of area median income and are paying more than 30% of their income on housing (CHAS data, extracted March 2022)

- d) The Pierce County Rental Assistance Program, which administers the region’s emergency rental assistance resources, received 9,383 applications.
 - e) University of California’s Urban Displacement Project reflects that as of July 2021, there were approximately 19,797 renters in the region with a high risk of eviction lockouts.
- 5) Veterans
- a) Around 11% of the homeless population are veterans

Describe the unmet housing and service needs of qualifying populations

- 1) Homeless as defined in 24 CFR 91.5 Homeless (1), (2), or (3)
- a) The number one issue for connecting Tacoma-Pierce County residents experiencing homelessness with shelter is the lack of on-demand shelter nearest to their most recent, permanent address. The Pierce County Shelter Plan, adopted in 2022, cites the need for more than 1,000 additional shelter beds in Tacoma and Lakewood.
 - b) HMIS data on Returns – Data collected in 2019 reflects that about 50% of chronically homeless individuals who secure permanent housing remained housed two years after exiting homelessness.
 - c) The 2022 Comprehensive Plan to End Homelessness estimates that 25% of current clients in the homeless system and 5% of incoming new clients will need permanent supportive housing. An estimated 240 units of permanent supportive housing units will need to be added to the countywide stock per year to meet demand.
 - d) Approximately 1000 new housing vouchers will need to be made available to each year (2022 Comprehensive Plan to End Homelessness)
 - e) The following populations are shown to have unique needs, poor outcomes in homelessness, and experience homelessness disproportionately. These populations will also benefit from targeted housing strategies to exit homelessness:
 - Black, Indigenous, and people of color
 - People with disabilities (as defined by American’s with Disabilities Act)
 - Seniors over the age of 65
 - Families with children
 - Members of the lesbian, gay, bisexual, transgender, queer, intersex, asexual, two-spirit, communities
 - Youth aged 12-18 and young adults between 18-24
 - People currently fleeing domestic violence, including intimate partner violence and other unsafe situations
 - Veterans who have served in the United States Air Forces
(2022 Comprehensive Plan to End Homelessness)
- 2) At risk of homelessness, as defined in 24 CFR 91.5 At risk of homelessness
- a) In Tacoma, there is a severe shortage of rental units affordable to extremely low- and low-income tenants. Since 2010, the city has lost about 10% of its affordable housing stock for low income tenants due to rent increases. (Tacoma Housing Action Plan, 2021)

- b) Tacoma’s Housing Action Plan (HAP), completed in early 2021, estimates a shortage of 4,897 units for tenants at or below 30% area median income. The total shortage of units affordable to tenants with incomes at or below 50% area median income is estimated at 7,159. These numbers align with Tacoma Housing Authority’s waitlist of approximately 6,500 households at the time the HAP was published.
- 3) Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD
- a) The Pierce County Five Year Plan to Address Homelessness cites permanent housing, access to mental health services, social support and addressing barriers to financial stability are the primary needs for this population. The plan lists support groups and a dedicated survivor fund as strategies to serve this population. Additionally, qualitative data received during the Consultation process reflects the need for legal services.
- 4) Other populations where providing supportive services or assistance under section 212(a) of NAHA (42 USC 12742(a) would prevent the family’s homelessness or would serve those with greatest risk of housing instability
- a) Rent debt continues to be a major issue facing tenants in the Tacoma-Lakewood Metropolitan Area. As of August 2021, the 13,855 households were behind on rent. The average rent debt is \$3,100 per household. The area-wide rent debt is \$42,337,000.
 - b) Between the third quarters of 2020 and 2021, Lakewood experienced a decrease in apartment vacancy rates. While the statewide vacancy rate at the time was 5.3%, Lakewood’s decreased to 2.7%, indicating increased competition for the city’s rental stock. Between July of 2020 and January of 2022, the average price of rent increased 20%. Research from the Washington State Department of Commerce connects vacancy rates below 5% with inflation of rents and increased homelessness, especially when incomes do not proportionately increase.
 - c) Redfin’s Rent.com March 2022 report shows that, year over year, Tacoma had the 8th highest, nationwide rent increase for on bedroom units at 39.7%. For two-bedroom units, Tacoma renters experienced the 6th highest increase at 46.6%. In addition to affecting low-wage earners, this impacts utilization of housing vouchers for some of our most vulnerable populations.
 - d) Tacoma Housing Authority Resolution 2021-09-22 (3) shows several voucher utilization trends that illustrate the growing need for housing stabilization services:
 - i) Year over year increase in households paying more than 30% of their income towards rent
 - ii) Shrinking vacancy rates for low income, affordable market, and market rate rental units
 - iii) An almost 200% increase in number of shopping days for traditional housing voucher holders
- 5) Veterans
- a) Permanent housing, transportation and connection to services and employment, and support with rental assistance, landlord-tenant relations are listed as primary needs of veterans in the 2020 Five-Year Plan to Address Homelessness.
 - b) Additional permanent housing options and services dedicated to homeless veterans are needed.

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

- 1) Congregate and non-congregate shelter units:
 - a) The Pierce County Council recently approved \$3,450,000 in funding dedicated to adding shelter units in underserved geographic areas
 - b) Countywide, there are 1187 operational, overnight shelter beds across 27 locations. Of these, 19 are located in Tacoma and four locations are undisclosed. There are also nine day centers, hygiene stations and shower sites. Of those, five are located in Tacoma. Of the seven, countywide Coordinated Entry sites, six are also located in Tacoma.
 - c) Pierce County has recently approved \$1,000,000 in funding for a Shelter Access Hub, which would provide on-demand shelter beds to people, navigation services, and transportation to more permanent shelter. A request for proposals to develop the hub will be released in quarter three 2022.
 - d) The City of Tacoma operates two temporary, emergency micro-shelters (TEMS) sites.
 - e) Both sites offer 24-hour security, on-site case management and support services, communal laundry, kitchen and community spaces, restrooms, showers, and garbage services. In total, the TEMS offer 104 shelter units. Both serve adults, including couples.
 - f) The City of Tacoma also currently operates an emergency shelter with 58 shelter units serving up to 100 unsheltered individuals. Basic hygiene services, safe sleeping accommodations, case management, and other supportive services are provided.
 - g) The City of Tacoma has recently contracted with FOB Hope to manage a site on Tacoma Public Utility-owned property that offers basic hygiene services and safe sleeping accommodations for unsheltered veterans.
 - h) A mitigation site is being planned on a Tacoma Community Redevelopment Authority-owned property that will offer hygiene services, case management and employment opportunities for as many as 50 individuals.
 - i) Recently, the Cities of Tacoma and Lakewood partnered with Pierce County to convert a former hotel into 85 units of non-congregate shelter serving up to 120 individuals experiencing homelessness. The site also provides 24/7 onsite case management, and access to wraparound services. The building will be converted to permanent supportive housing in 2024.
- 2) Supportive services:
 - a) The City of Tacoma has \$20,122,390 contracted for 2021 and 2022 for shelter and supportive services.
 - b) In June 2020, a countywide Pilot Transportation Project is scheduled to launch, providing 500 people experiencing homelessness a one-year Pierce Transit bus pass as part of Critical Time Intervention, Rapid Rehousing, or Emergency Shelter enrollment.
- 3) Tenant-Based Rental Assistance
 - a) Pierce County offers an emergency rental assistance program limited to eligible households impacted by COVID-19 related loss of income. The program prioritizes households with income

below 50% area median income. Tacoma residents are eligible. Between March of 2021 and 2022, the program had the following outputs:

- i) \$80.8 million was distributed
 - ii) 40.4% of applicants received assistance
 - iii) An average of \$10.4 thousand per household was distributed to 8,462 households
 - iv) 44% of households receiving assistance were at or below 30% area median income
 - v) Of those numbers, 864 Tacoma households were provided with \$6,106,048 in rental assistance. 1,575 households are awaiting processing to a provider for rental assistance.
- b) The City of Tacoma administers a donor-advised rental assistance fund in partnership with the Greater Tacoma Community Foundation for households at or below 50% area median income with COVID-19 related loss of income. As of March 2021, the fund balance is \$32,820.
 - c) Pierce County Housing Authority operates tenant-based and project-based voucher programs that require 75% admission of extremely low-income families. Currently, the PHA administers 2,946 Housing Choice Vouchers and 124 public housing units. Pierce County Housing Authority's properties and programs also serve Lakewood residents.
 - d) Lakewood's HOME Tenant-Based Rental Assistance Program has paid out \$112,583.42 in rental assistance to 47 rental households totaling 102 persons assisted. Lakewood's CDBG CV rental and mortgage assistance program paid out \$641,938.29 to assist 186 households totaling 450 persons with rental and mortgage assistance. Both programs are currently closed.
 - e) Tacoma Housing Authority operates a project-based voucher program that requires 75% admission of extremely low-income families. Programs included that serve qualified populations are the Family Unification Vouchers, Veterans Administration Supportive Housing Vouchers, Children's Housing Opportunity Program Vouchers, Emergency Housing Vouchers, and Foster Youth to Independence Vouchers. Additionally, households displaced by domestic violence are prioritized. 4,767 households are served by Tacoma Housing Authority's rental assistance programs.
 - f) Currently there are 269 vouchers available through Pierce County Housing Authority. Utilization rates from the second half of 2021 were around 73%
 - g) Tacoma Housing Authority has 267 total vouchers. Utilization of tenant based vouchers in late 2021 was around 49%
- 4) Affordable Rental Housing and Permanent Supportive Rental Housing
 - a) Affordable Housing Online shows that there are 102 low income housing apartment communities offering 7,318 affordable apartments for rent in Tacoma
 - i) 2,861 units are income-based paying no more than 30% of income to gross rent
 - ii) 3,804 units are subsidized and are affordable to low income households
 - b) Tacoma Housing Authority's portfolio includes over 1,300 public housing units. 60% of units are rented to extremely low-income households earning 30% or less area median income.
 - c) As of 2020, there were 291 additional permanent supportive housing units in the Pierce County development pipeline to be completed by 2023.
 - d) The City of Tacoma has approximately \$852,500 contracted 2021-22 for permanent supportive rental housing services.

e) Senior affordable housing

The Senior Affordable Housing Inventory that follows includes housing units available to seniors who also qualify under the HOME ARP income limits. The sampling was sourced from a 2021 CBRE Market Study for Tacoma zip codes 98402, 98404, 98405, 98408, and 98418 and from the Washington State Housing Finance Commission’s Web Based Annual Reporting System.

Senior Affordable Housing Inventory						
Property	Total Units	Homeless	30% AMI	35% AMI	40% AMI	50% AMI
Annobee Apartments	43	-	-	-	-	33
Harbor View Manor	159	-	80	-	-	48
Merrill Gardens at Tacoma	120	-	-	-	-	24
New Tacoma 2 Senior Housing	40	8	20	-	10	-
SHAG Senior Living Communities, Conservatory I & II	423	-	-	105	183	-
Total Units Avail. To HOME ARP Qualified Populations	509	8	100	105	193	103

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

1) Shelter

There is an urgent need for additional shelter beds to be available on demand and located near where households were last permanently housed throughout Pierce County. The CoC’s 2022 Shelter Plan outlines the following combination of shelter models and sizes are needed to serve the current level of unsheltered residents.

a) Lakewood

- i) Adult Congregate Shelter: 45 units/50 beds
- Adults/Family Congregate Shelter: 50 units/130 beds
- Adult Safe Encampment: 45 units/50 beds (Could evolve to a tiny house location)
- Family Safe Encampment: 15 units/50 beds (Could evolve to a tiny house location)
- Family Tiny House: 15 units/50 beds

b) Tacoma

- i) Adult Congregate Shelter: 90 units/100 beds
- Adult Congregate Shelter: 45 units/50 beds

Adult Congregate Shelter: 45 units/50 beds
Adults/Family Hotel-based: 25 units/50 beds
Youth House-Based: 45 units/50 beds
Adults/Family Medical Respite: 25 units/50 beds

Adult Safe Encampment: 190 units/200 beds (Could evolve to a tiny house location)
Family Safe Encampment: 15 units/50 beds (Could evolve to a tiny house location)
Adults/Family Safe Parking (multiple sites): 100 units/100 beds
Family Tiny House 30 units/100 beds Family Tiny House: 30 units/100 beds

While shelter should be available on demand to any household experiencing homelessness, it viewed by many of our homeless system's stakeholders as a temporary solution and permanent housing is a high priority throughout the region.

2) Permanent Supportive Housing

- a) To meet the needs of 5% of new clients to the homeless system, the stock of permanent supportive housing units will need to increase by 240 units each year.
- b) Currently, there is a projected \$10 million in annual operations funding to support permanent supportive housing and an additional investment of \$24 million is needed. This does not include estimates for capital needed for acquisition or construction of new shelter and permanent supportive housing. The cost to construct the planned 1,800 units of permanent supportive housing could range between \$100M and \$400M, depending on the type of housing and the mix of project versus tenant-based housing assistance.

3) Affordable Housing

- a) Tacoma has a severe shortage of housing affordable extremely low- and low-income households. With anticipated regional growth projections, rental production will need to meet the targets outlined below:
 - i) Rental units affordable to households at or below 30% area median income = production of 90 to 200 units annually, or 1,800 to 4,000 over 20 years; and
 - ii) Rental units affordable at 31-50% area median income = 80 to 175 units annually or 1,600 to 3,500 over 20 years.
- b) Senior affordable housing
 - i) The Consortium's approximate population aged 45+ who are at or below 50% AMI is 3,892 (ACS 2019 5-Year Estimates). While senior housing models generally serve households aged 55+, the age brackets available from ACS begin at 45-65 years. Including this bracket shows the size of the current population aged 55+ that is at risk of homelessness and includes the growing portion of the population who will become age-eligible for affordable 55+ developments in the next decade. The current inventory of approximately 509 units available to seniors who are also eligible under HOME ARP qualified populations
 - ii) The average 2020 occupancy rate for a sampling of three currently operating low-income senior housing developments in Tacoma containing a total of 131 units was 98.2%, indicating consistently high demand.

- iii) CBRE completed a 2021 Market Study for a 75-unit senior housing development indicate demand for senior housing affordable at 50% AMI and 30% AMI. The study's primary market area (PMA) includes Low Income Housing Tax Credit properties in Tacoma zip codes 98402, 98404, 98405, 98408, and 98418. Demand is illustrated using two analysis points.

The first is the capture rate, which is the percentage of seniors at the 30% and 50% AMI within the PMA that a subject would need to attract to maintain stable occupancy. When the capture rate exceeds 30% it is considered a high risk investment and when it exceeds 100% the market is considered saturated. The capture rate for the 75-unit study subject was 1.8%, indicating that there will be ample demand for senior housing units affordable at the 30% and 50% income limits.

The second analysis point used to show demand for the market area is the penetration rate, which assigns a study subject a percentage of the market share that it must capture to maintain stable occupancy. Currently there are 280 total competitive units serving 4,265 qualified households, reflecting a 6.6% penetration rate that is far from serving the full population of eligible households.

For homeless households, the total number of 38 competitive units available to 248 qualified households reflects a penetration rate of 15.3% that is also far from serving the full population of eligible households. The number of eligible households is based on data collected in the 2021 Point-In-Time Count, which likely undercounted the number of senior households experiencing homelessness. Even at a conservative estimate, these figures indicate ample demand for units available to seniors experiencing homelessness.

4) Service Delivery

Through our Consultation, we heard that there are significant gaps in services that are individualized to people's needs. For instance, even when housing is available for people exiting homelessness, they may not be housing ready and cannot be placed.

Youth need more workforce development opportunities that will support their entry into housing-wage jobs, as housing is too expensive for the jobs available to them now. Workforce Central is the convener for several programs responding to this need.

Households fleeing domestic violence need legal and financial technical assistance to dissolve ties with their abuser.

People experiencing disabilities often fall into gaps where housing assistance is not open to them at the same time they are undergoing the lengthy process for disability assistance.

Subpopulations of veterans, for instance women and lesbian/gay/trans/other-identifying communities, struggle to find safety in existing shelters and trauma-informed services to support their journey to housing stability.

The most demand was for mental health and addiction treatment services.

In summary, unmet service needs are very diverse and need to be tailored to the population utilizing them. Regardless of the service type, we were told that trust- and relationship-building over time are vital to increasing participation. We also heard that service delivery by providers who have lived experience increases success for participants.

Identify the characteristics of housing associated with instability and 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 Tacoma-Lakewood HOME Consortium’s 2020-2024 Consolidated Plan defines some housing characteristics associated with instability and increased risk of homelessness; including incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room and a cost burden of 30% or more.

The 5-Year Plan to Address Homelessness lists a handful of conditions associated with instability and an increased risk of homelessness that may be used in the Tacoma-Lakewood HOME Consortium’s definition of other populations. For the CoC, homelessness defined as “any household who lacks, or is at immediate risk of losing a regular, fixed, safe, and adequate nighttime residence; those actively fleeing or attempting to flee domestic violence; as well as unaccompanied youth under any federal definition of homelessness.”

Identify priority needs for qualifying populations

The priority needs for qualifying populations are immediate shelter on demand, permanent affordable and supportive housing, rental assistance, and supportive services.

We heard consistently that while the need is high for additional shelter space, shelters will continue to be overfilled if there is no housing available to transition to. Housing with accompanying services, or permanent supportive housing, is a high priority.

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

Consortium staff initiated the planning process with an inventory and analysis of existing plans, shared data, and strategies. In coordination with the Pierce County Consortium of Towns and Cities, staff collected additional qualitative and quantitative data through surveys, presentations, and interviews with regional agencies who provide housing and services to qualified populations.

To identify gaps and priorities, staff compared data on needs with current and incoming resources that can be dedicated to those needs. In addition to prioritizing any gaps that were made apparent in the

planning process, the Consortium also prioritized eligible housing development projects considered during recent funding application periods however did not receive funding due to insufficient resources.

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 Tacoma is working with the Tacoma Community Redevelopment Authority (TCRA) and the City of Lakewood to lead a collaborative process in consultation with the Pierce County Continuum of Care and other community partners to identify projects for HOME-ARP funding that will address priority needs.

The Tacoma City Council will authorize subrecipient agreements between The City of Tacoma, the City of Lakewood and the TCRA to administer to carry out HOME-ARP activities under the Tacoma-Lakewood Consortium. The TCRA, the City of Lakewood, and any other subrecipients will determine whether projects and persons to be served are members of qualifying populations.

Tacoma

To use the funds to create affordable housing units as soon as possible the TCRA will select projects for funding through a previous publicly advertised Notice of Funding Availability (NOFA) and may issue an additional NOFA to identify additional projects or allocate supportive services funds. A noncompetitive solicitation may be used if a project or proposed services are identified and ready to begin construction or service delivery immediately or within 9 months.

Lakewood

Lakewood will review funding options based on the HOME ARP Plan guidelines and evaluation of providers within the City of Lakewood to determine HOME ARP projects. Through this evaluation process, the City of Lakewood will determine what portion of funds they will administer directly or utilize a subrecipient based on the project or activity type.

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 PJs entire HOME ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJs HOME ARP program

Not applicable.

Use of HOME ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$555,000		
Acquisition and Development of Non-Congregate Shelters	\$0		
Tenant Based Rental Assistance (TBRA)	\$587,744		

Development of Affordable Rental Housing	\$3,468,081		
Non-Profit Operating	\$ 0	0%	5%
Non-Profit Capacity Building	\$ 0	0%	5%
Administration and Planning	\$500,000	9.78%	15%
Total HOME ARP Allocation	\$5,110,825		

Additional narrative if applicable

Program funding amounts are based on input received during the consultation process and data that was analyzed to determine needs and priorities among the eligible uses for the funds. Supportive services may be provided to tenants in conjunction with housing units developed, or administered separately as Administration funds will be used by the City of Tacoma for grant planning and management, including the long term compliance of projects with extended affordability or service periods.

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:

Limited resources need to be balanced between investments that increase the supply of affordable units through capital investment, tenant based rental assistance, services that focus on permanent housing outcomes, and shelter programs that keep people safe. The rationale for the plan to fund the production of affordable rental housing, tenant based rental assistance and supportive services is based on this balance while taking into account significant new resources being made available to address gaps in shelter capacity. As noted in the gaps analysis, Pierce County has recently approved \$1,000,000 in funding for a Shelter Access Hub, which would provide on-demand information on available shelter beds, navigation services, and transportation to more permanent shelter. The consortium’s plan to fund eligible activities will put the largest proportion of HOME-ARP resources into what we determine to be a key need identified in the gap analysis: projects that will place additional permanent supportive housing units in the pipeline and contribute toward the goal of 240 new units to come online per year that is required to meet the need.

One of the six overarching goals of Pierce County’s Comprehensive Plan to end Homelessness is to expand the permanent housing system capacity so every household can successfully exit homelessness. The core components of permanent supportive housing are rental assistance, case management and supportive services. Gap analysis demonstrated need both for a tenant-based approach in the form of rental assistance vouchers and a project based approach in the form of development subsidy for capital investment in permanent supportive housing that low-income households can sustain. Individualized supportive services will also be made available and can be paired with affordable housing units, vouchers or other forms of tenant based rental assistance, shelter operations, or with other case management programs.

In addition, tenant based rental assistance that is not paired with supportive services will serve some qualifying populations with unaddressed needs for units affordable to very-low income households identified in the plan's gaps analysis.

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

At least 74 units of Permanent Supportive Housing and Affordable Rental Housing will be constructed. Of these 74 units, at least 53 will be for qualifying populations. This represents an investment of about \$50,000 per unit. Other public funding sources anticipated to be leveraged to reach this affordable rental housing production goal include 9% tax credits, the State Housing Trust Fund, and Pierce County affordable housing funds.

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 Pierce County Comprehensive Plan to End Homelessness estimates that 1,800 units of Permanent Supportive Housing need to be constructed in order to bring the level of homelessness to functional zero in Pierce County. The City of Tacoma City Council has set a goal of 96 units of Permanent Supportive Housing in the pipeline by the end of 2022. These units will help meet these goals and address Tacoma's priority need for permanent and supportive affordable housing.

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

Tacoma

HOME ARP Funded Permanent Supportive Housing units: Individuals and households that have been referred by Pierce County Homeless Crisis Response System (HCRS)'s Coordinated Entry (CE) program will receive a preference for permanent supportive housing units over members of qualified populations who are not eligible for HCRS CE. As of July, 2022, in order to be eligible for HCRS CE, individuals and households must lack a fixed, regular, and adequate nighttime residence or be fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, in accordance with and as further defined by the U.S. Department of Housing and Urban Development (HUD) under 24 CFR Part 578.3 as category (1) and (4) of the definition of homeless.

These households meet the following conditions:

1. Households must be experiencing homelessness, in accordance with category (1) or category (4) of HUD's definition of homelessness under 24 CFR Part 578.2.
2. Households must meet an income standard of less than 50% of the Area Median Income (AMI).

These households will receive preference for placement in HOME-ARP funded units and for selection to receive HOME-ARP funded supportive services. The City, in consultation with HCRS, will establish policies and procedures for applying the established preference and method of referral.

The City of Tacoma and its subrecipient(s) will enter into a written agreement with HCRS to use its Coordinated Entry (CE) program in coordination with other referral methods. The written agreement will delineate how the operator of the permanent supportive housing project or supportive service provider will maintain a waitlist that includes households referred by CE and households that are members of other qualified populations. Individuals and households experiencing and exiting homelessness can be referred by HCRS through CE and will be added to the project wait list in order of their placement within the CE system's priority pools. Those not referred by CE may be referred through affirmative marketing performed by the operator of the permanent supportive housing or supportive service provider, and by any other community sources. Members of any qualified population who are referred by other referral agencies will be placed at the bottom of the waitlist by the operator of the permanent supportive housing or supportive service provider in placement after those individuals and households who have been referred by HCRS. Households referred by other referral methods will be added in chronological order.

CE standard operating procedures also provide for:

- A process for households fleeing domestic violence and seeking services from non-victim specific providers
- A process to ensure safe and confidential access to the CE system
- A process to ensure immediate access to emergency services, such as domestic violence helplines and shelter
- Physical accessibility and reasonable accommodations
- Effective communication with individuals with disabilities
- Marketing to all households
- Marketing to household least likely to apply
- Referrals to subpopulation designed access point
- Access to emergency services
- Grievance and appeal procedures.

The general approach to prioritization within CE is to give precedence to those with the greatest vulnerability or barriers to housing:

- People most at-risk to imminent harm if they remain homeless
- People who have the greatest barriers to accessing housing.

Channels for referrals to CE include the City's HEAL team, Tacoma Rescue Mission, CCS, Recovery Café, Comprehensive Life Resources and other referral sources in the community.

Permanent supportive housing projects funded with HOME-ARP may serve a particular subpopulation. For instance, a HOME-ARP supported housing project may consist of senior housing that is exempt from liability for familial status discrimination because it is intended and operated for occupancy by persons 55

years of age and older, where at least 80% of the units will have at least one occupant who is age 55 years of age or older, and where the facility publishes and adheres to policies and procedures that demonstrate the intent to operate as “55 or older” housing including compliance with HUD’s regulatory requirements for age verification of residents. In this case, the written agreement between the City of Tacoma, its subrecipient and the HCRS would identify a screening, diversion and referral process that includes members of all qualifying populations who are 55 years of age and over.

Some units within a permanent supportive housing project may have a preference for households that include a member with physical disabilities if the unit provides features that accommodate their disability.

HOME ARP funded Supportive Services: Supportive services funded with HOME ARP funds may be paired with a specific permanent supportive housing project and offered to the members of qualifying populations who reside there, or may be administered by one or more providers on a separate basis. Individuals and households seeking supportive services funded by HOME ARP funds and not offered in conjunction with housing may also be placed on the program-specific waitlist using the same preference, methods and HOME ARP program requirements described for HOME ARP funded housing units, depending on the subrecipient chosen to provide the services.

All HOME-ARP funded activities: The City and its subrecipient will comply with all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a) when applying the established preference for homeless individuals and households/families through its referral methods. HOME ARP funding agreements will require key subrecipient staff to complete fair housing training regarding most current protections and requirements within 90 days.

No limitations have been identified because the totality of HOME-ARP funds will serve all qualifying populations, and while one permanent supportive housing project may serve only seniors, other HOME-ARP projects will serve other qualifying populations and subpopulations.

Lakewood

Households must meet the definition of Qualifying Populations, in accordance with Categories 1-4 under section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) for the HOME Investment Partnerships Program (HOME). Lakewood will be using the project/activity waiting list method and will maintain a waiting list based upon identified qualifying populations. A preference will be given to households that meet certain qualifying conditions. The following conditions shall be equally weighted and households that meet one or more of the following preferences will be placed in the preference pool, in chronological order:

- Households of veterans and their family that meet one of the qualifying populations;
- Elderly (62+) and disabled households at risk of homelessness; and
- Those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.

Households that do not meet any of the qualifying preferential conditions listed above, but instead meet general qualifying conditions, will be placed on the waiting list after those in the preference pool, in chronological order.

Lakewood will accept any referrals with no limitations for placement of eligible applicants. Direct referral from funded providers will take precedence in placing applicants.

Lakewood will not implement any initial income restrictions beyond that which is required of the definitions of the qualifying populations. Initial income verification will not be required, provided individuals assisted meet one of the qualifying populations identified in accordance with Categories 1-4 under section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) for the HOME Investment Partnerships Program (HOME), except as necessary to determine an affordable rental contribution by the qualifying household or to establish eligibility for another funding source.

If a preference was identified, describe 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

Tacoma's funding plan introduces a preference for clients who have entered the HCRS and who meet the following conditions:

1. Households must be experiencing homelessness, in accordance with category (1) or category (4) of HUD's definition of homelessness under 24 CFR Part 5782.
2. Households must meet an income standard of less than 50% of the Area Median Income (AMI).

The 2022 Comprehensive Plan to End Homelessness estimates that 25% of current clients in the homeless system and 5% of incoming new clients will need permanent supportive housing. An estimated 240 units of permanent supportive housing units will need to be added to the countywide stock per year to meet demand. A goal of the Comprehensive Plan to End Homelessness is to expand the permanent housing system to meet the need, with associated strategies to size the capacity of the permanent supportive housing system to meet the need and to coordinate with affordable housing efforts to develop 0-30% AMI and 30-50% AMI housing dedicated to households exiting homelessness.

Seniors over the age of 65 are among populations identified by the HCRS as having unique needs, poor outcomes in homeless systems, disproportionately experiencing homelessness, and who will benefit from targeted strategies to exit homelessness.

Lakewood's affordable housing and tenant-based rental assistance programs, by targeting veterans and their families, elderly and disabled households, and those fleeing domestic or other acts of violence, will seek to secure permanent affordable housing options for some of the most vulnerable populations facing homelessness today. As identified in recent HMIS data, nearly 20% of individuals registered in HMIS are persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and approximately 11% identify as veterans. Additionally, by targeting elderly and homeless

households, the city will focus efforts on populations who, due to traditionally fixed incomes, are often disproportionately impacted by rising housing costs as a percentage of total income.

Conclusion

In conclusion, HOME ARP resources will be used through 2030 to provide affordable rental housing, rental assistance, and services to populations who are experiencing homelessness or who are at most risk of housing instability. A comprehensive engagement and needs assessment led to the Tacoma-Lakewood HOME Consortium's spending approach to address gaps identified in the analysis. Preferences will contribute to meeting needs by ensuring those most in need of housing and services will have access to them. HOME ARP resources will be leveraged with other public and private dollars to create housing and maximize delivery of services that foster housing stability.