

## Participating Jurisdiction: Escambia HOME Consortium

### Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction's geographic area,
- homeless service providers,
- 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.

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.

### Template:

***Describe the consultation process including methods used and dates of consultation:***

The Escambia County Department of Neighborhood and Human Services' Neighborhood Enterprise Division (NED) requested input from individuals and agencies including the CoC and numerous agencies who regularly participate in a community-wide Homelessness Reduction Task Force. Those consulted included Public Housing Authorities serving the jurisdiction and nonprofits providing shelter services, services to people with disabilities, victims of domestic violence, veterans' service providers, as well as nonprofits addressing issues concerning Fair Housing, civil rights, housing counseling, and more.

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*List the organizations consulted:*

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<b>Opening Doors</b>	Homeless services & lead agency for CoC	In-person conversation	<p>In person consultation was held on August 26, 2022. The Executive Director of Opening Doors, the local area Continuum of Care lead agency met with Division Manager and a Program Manager from Escambia County’s Neighborhood Enterprise Division. Opening Doors manages the HMIS reporting as well as the Coordinated Entry Program. As such, the organization interacts with all of the Qualifying Populations. The ED referenced the importance of the community working in a coordinated way to maximize what are generally insufficient resources. He stated that in the coming year 300 affordable rental units in the area will be converting to market rate, and there are no new affordable rental developments currently underway in either County served by the CoC and represented by the HOME Consortium. He shared his perspective on prioritizing the funds to support the most vulnerable populations: seniors over 62, homeless youth and runaways, and families with children. He stated that the community’s resources to serve these groups are extremely limited.</p>
<b>Area Housing Commission</b>	PHA	correspondence	<p>A consultation was held with the Executive Director of the Area Housing Commission, a local Public Housing Authority, through email correspondence with a Program Manager from Escambia County’s Neighborhood Enterprise</p>

			<p>Division. This organization primarily serves the population at risk of homelessness. The response to letter of inquiry was received June 21, 2022. The ED stated that some of the greatest needs of the community was the retention of affordable housing stock, and increasing the availability of permanent housing at an affordable cost to low-income families, particularly disadvantaged minorities and those with special needs. He wrote that “the primary means toward this end is to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations, in the production and operation of affordable housing”.</p>
<p><b>City of Pensacola Housing Department</b></p>	<p>PHA/Consortium PJ</p>	<p>In-person conversations</p>	<p>In person consultation was held on several occasions in the autumn of 2022 and early 2023 between the Director and Assistant Director of the City of Pensacola Housing Department and the County’s Neighborhood and Human Service Department Director and the Division Manager and a Program Manager from Escambia County’s Neighborhood Enterprise Division. The two jurisdictions have long maintained a partnership approach to meeting the housing needs of their respective constituencies, and have experience in working with all of the qualifying populations. The services provided by this public agency include homebuyer assistance, owner-occupied home rehabilitation, Section 8 and VASH housing voucher issuance, as well as emergency rent, mortgage and utility assistance.</p>

			The goal of the ongoing conversations has been to maximize complementarity in the jurisdictions' utilization of available funding to meet specific community needs as well as long-term, sustainable support.
<b>Milton Housing Authority</b>	PHA/Consortium PJ	correspondence	Awaiting response
<b>Escambia County Neighborhood and Human Services</b>	Lead jurisdiction for HOME Consortium	In-person conversations	In person consultation was held on several occasions in through 2022 and early 2023 between the Director of the Neighborhood and Human Services Department and the County's Neighborhood, the Division Manager and Program Managers from Escambia County's Neighborhood Enterprise Division, and a Special Projects Manager with Escambia County Administration. In considering the activities allowed through the HOME-ARP grant funding the discussion focused on the community need for affordable rental for the low and moderate income households of the County, and additional shelter for unhouses persons. Through the COVID pandemic the County offered emergency rental, mortgage and utility assistance to households impacted by the public health crisis. This allowed a first hand awareness of the challenges faced by low and moderate income households to sustain their current living situations and how many households in the community are at-risk of homelessness currently.
<b>Pathways for Change</b>	'At-Risk' family services	In-person conversation	In person consultation was held on June 6, 2022. The Executive Director of Pathways for Change, who is also co-chair of the area Homelessness Reduction Task Force, met with a Program

			<p>Manager from Escambia County’s Neighborhood Enterprise Division. The Agency serves families at risk of homelessness, and had (pre-COVID) also provided addiction recovery and offender diversion programs. The ED said that the grant funds are an opportunity for the development of community infrastructure to better address homelessness rather than using the funding primarily for immediate assistance. The ED also stated that from her perspective TBRA would be a futile use of significant funding as the inventory of available rental properties in the area is insufficient to meet the needs of current Section 8 and VASH housing voucher holders.</p>
<p><b>REAP</b></p>	<p>Homeless services &amp; shelter</p>	<p>In-person conversation</p>	<p>In person consultation was held on August 24, 2022. The Executive Director of the RE-Entry Alliance of Pensacola (REAP) met with a Program Manager from Escambia County’s Neighborhood Enterprise Division. REAP operates three different location providing shelter and supportive services to all of the grant qualifying populations. When discussing the activities supported by the grant funds he emphasized the need for supportive services, stating that he’s witnessed very little long-term success for individuals experiencing homelessness without such services. While he spoke of the importance of finding rapid rehousing for vulnerable persons, and so thought TBRA would be a needed component of the activities funded by the grant, he also mentioned the tight local rental market at all price points.</p>

<p><b>There is Hope</b></p>	<p>Homeless services</p>	<p>In-person conversation</p>	<p>In person consultation was held on October 4, 2022. The Executive Director of There is Hope met with the Division Manager and a Program Manager from Escambia County’s Neighborhood Enterprise Division, as well as the Director of the larger Neighborhood and Human Services Department of the County. The ED stated that the agency has been serving the community’s homeless population for just under a year. The agency currently provides day treatment and life-skills training as well as transportation, non-perishable food and second hand clothing. They are hopeful to renovate their current facility (14,500 sq.ft.) to provide shelter space. The ED, whose own life experience included a period of homelessness, said some of his greatest concern was for chronically homeless individuals. He stated that such population requires significant supportive services and extensive time in ‘transitional’ housing before being capable of self-sufficiency.</p>
<p><b>Waterfront Rescue Mission</b></p>	<p>Homeless services &amp; shelter</p>	<p>In-person conversation</p>	<p>In person consultation was held on October 4, 2022. The Outreach Director, as well as a program staff person from Waterfront Rescue Mission met with a Program Manager from Escambia County’s Neighborhood Enterprise Division and the Director of the County Neighborhood and Human Services Department. The agency provides shelter to homeless men, as well as an addiction recovery program, also for men. The conversation began with the agency staff reviewing their history of service in the</p>

			community and their involvement in the CoC. The agency representatives stated that they are on track to house over 2,000 discrete individuals in 2022. They also stated that on most nights they have excess bed capacity, which they admit is likely due to the restrictions and requirements of their faith-based organization and program. When asked what they considered a priority for the grant funds they spoke to the need for ‘deeply affordable’ rental housing for extremely low-income persons and families.
<b>Pensacola Dream Center</b>	Women’s shelter	correspondence	Awaiting response
<b>90Works</b>	Veterans’ services & sheltering	correspondence	A consultation was held with the President of Operations of 90Works, a local agency providing a variety of services, including housing, to veterans through email correspondence with a Program Manager from Escambia County’s Neighborhood Enterprise Division. The input provided reflected other feedback received regarding the general lack of affordable rental housing in the community. The comments also highlighted some characteristics of the specific population which makes providing services more challenging. The response stated, for instance, that veterans with a history of PTSD often have a difficult time in congregate shelter settings and would prefer to stay at encampments. The representative also mentioned the need for long term supportive services as well as specialized housing to accommodate service-related disabilities. Also stated was an increase in the number of aging

			veterans who need assisted living settings or skilled nursing care.
<b>Council on Aging</b>	Senior services	Phone conversation (response to correspondence)	Telephone consultation was held on June 6, 2022. The Executive Director of the Council on Aging of Northwest Florida and a Program Manager from Escambia County’s Neighborhood Enterprise Division held an approximately 25 minute conversation regarding the current needs of the low-income residents of the community and how available funding might support needed activities. He stated that not insignificant percentage of the low-income elderly are at risk of homelessness, even those who own their homes, as such come uninhabitable due to disrepair. He stated that deeply affordable rental is severely lacking in the community. He also stated the need for supportive services to keep some seniors secure within whatever housing (rental or owned) they have.
<b>Human Relations Commission</b>	Fair housing	In-person conversation	In person consultation was held on June 2, 2022. The Executive Director of the Escambia-Pensacola Human Relations Commission, the local Fair Housing and EEO agency met with a Program Manager from Escambia County’s Neighborhood Enterprise Division. The agency primarily serves the qualifying population at-risk of homelessness. In discussing the opportunities provide with the grant funds, the ED stated his major concern regarding the lack of rental housing in the area, that what had been developed as affordable rental is converting to market rate rentals and the recent phenomenon of rental landlords



		<p>converting their properties to short term vacation rentals. He stated that more than 2,000 rental units in the two county area of the Home Consortium have been taken off the long-term rental market. He also stated that a significant number of affordable rentals that are in the community's inventory have repair issues which have not been addressed since Hurricane Sally, which struck the area in September of 2020. Finally he mentioned that over the past several years there has been redevelopment, which he referred to as gentrification, in the downtown area with no effort to integrate affordable housing. He said his first priority would be to increase the community inventory of rental housing for low and moderate income households, whether as single-family units or in multi-family developments.</p>
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***Summarize feedback received and results of upfront consultation with these entities:***

Responses given in consultation matrix. General consensus on community lack of affordable rental inventory for low and moderate income households. While the community has some shelter beds available for persons experiencing homelessness, the majority are congregate-style shelters. Most segregate the populations by gender, and only one shelter can accommodate a household of (a) parent(s) with children. Many agency representatives spoke of the unique needs of their specific constituencies, such as veterans or the aged. It was also understood that vulnerable populations were at a greater disadvantage and at greater risk of abuse or peril..

**Public Participation**

In accordance with Section V.B of the Notice (page 13), 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.

PJs are required to make the following information available to the public:

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

***Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:***

- ***Date(s) of public notice for hearings:*** September 20, 2022; January 6, 2023
- ***Date(s) of public hearing:*** September 26, 2022; January 19, 2023
- ***Public comment period for draft plan: start date -*** March 3, 2023  
***end date -*** March 20, 2023

***Describe the public participation process:***

Escambia County administered a survey, available in both English and Spanish, seeking input from the participants of the aforementioned task force as well as members of the public, and consulted directly with many of these agencies inquiring how best to utilize the funds provided by HOME-ARP.

The County invited citizen participation through the creation of a County website. The public survey was available through the website and included paper copies of the survey at the seven (7) locations of the County library system and nine (9) County community centers. After tabulating the results of the surveys, a community Town Hall meeting was scheduled for Monday, September 26, 2022. Notice of the meeting was published in the Pensacola News Journal and promoted on the County's main web site as well as the 'Help for the Homeless' site. Community input was solicited and recorded at the Town Hall session and was then included as the County Commission considered the allocation of funding at their Board meeting on January 19, 2023. The draft of the Allocation Plan was completed and available for public review and comment for 17 calendar days from March 3, 2023 until March 20, 2023. Public notice of the open comment period was published in the Pensacola News Journal, the local publication with greatest circulation, as well as on the County's website.

***Describe efforts to broaden public participation:***

The Community Survey was conducted online as well as 'in-real-life' for residents without internet access. The survey was available in both English and Spanish. The survey was advertised on the Escambia County Website with links posted across the County's social media pages which included Twitter and Facebook.

***Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:***

The next several pages contain the responses to the Community Survey, as well as the demographic breakdown of the respondents. Comments received at the Town Hall meeting unsurprisingly substantially mirrored the survey results.

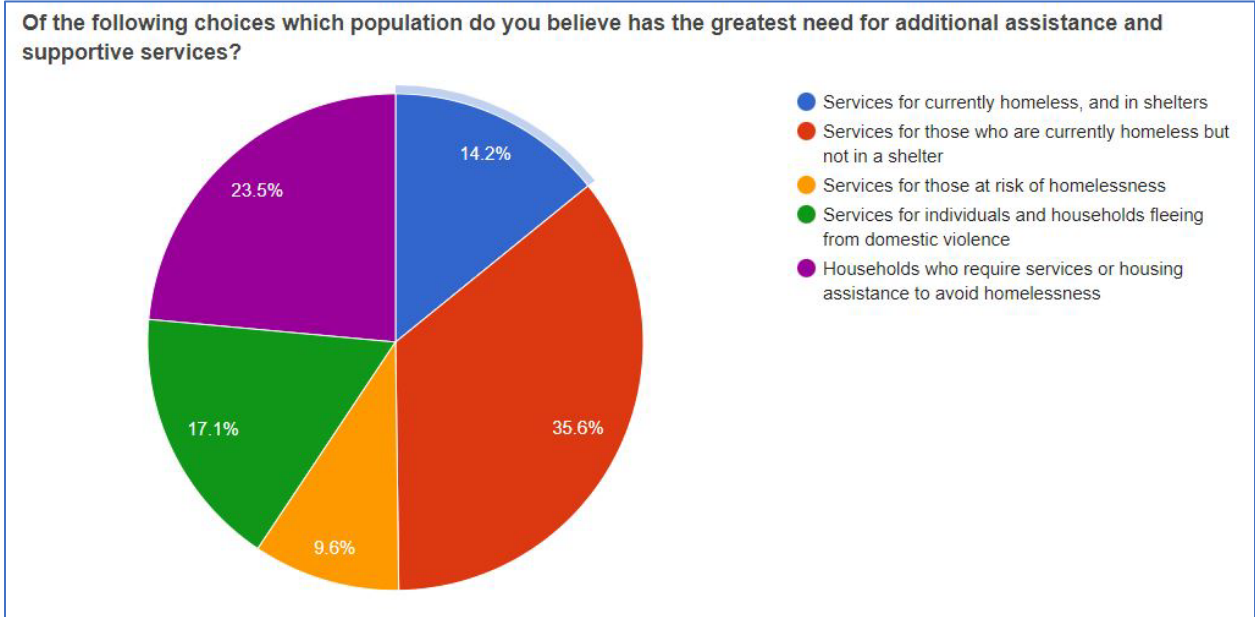


Figure 1: Community Survey response

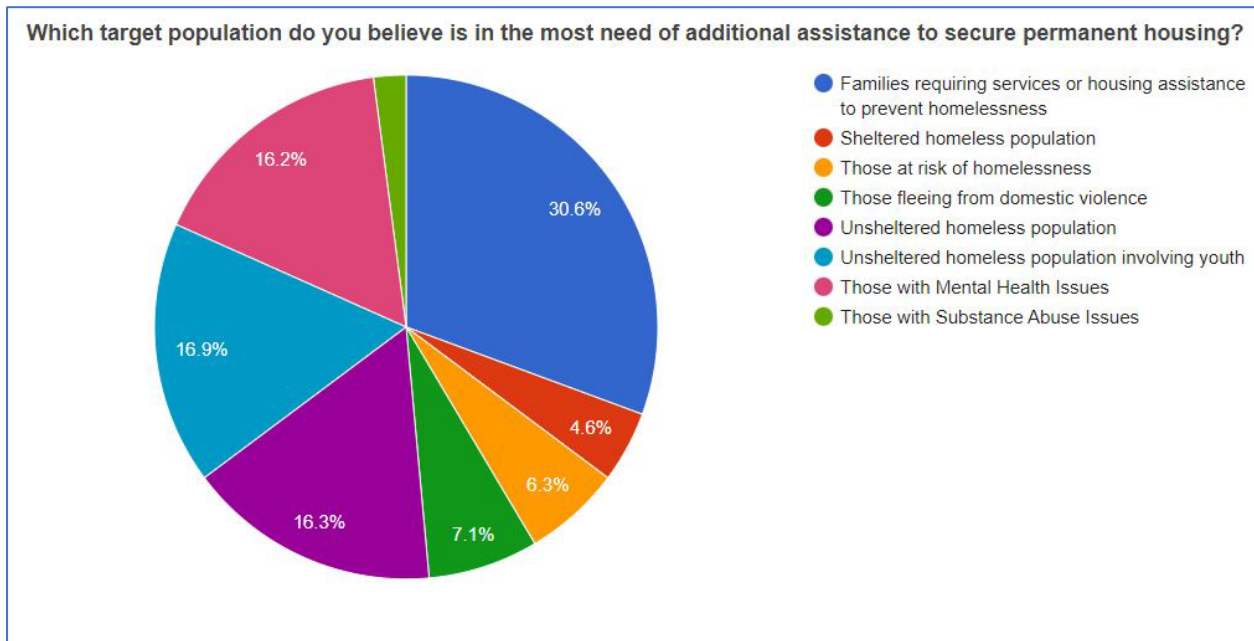


Figure 2: Community Survey response

From the options below what do you believe is the area of greatest funding need for shelter facilities in Escambia and Santa Rosa Counties?

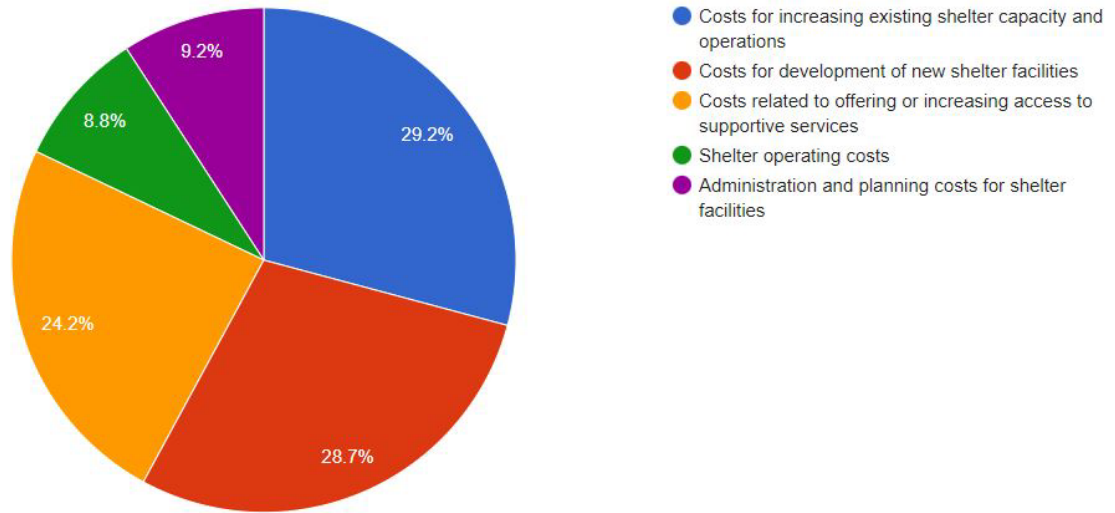


Figure 3: Community Survey response

When you think about the needs of individuals in Escambia and Santa Rosa County currently experiencing or at risk of homelessness, what target population stands out as a priority?

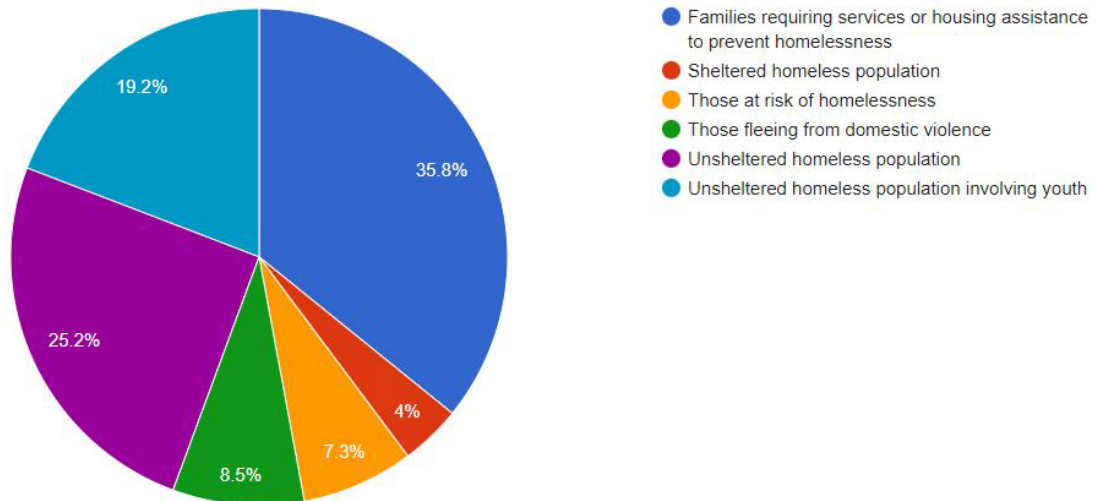
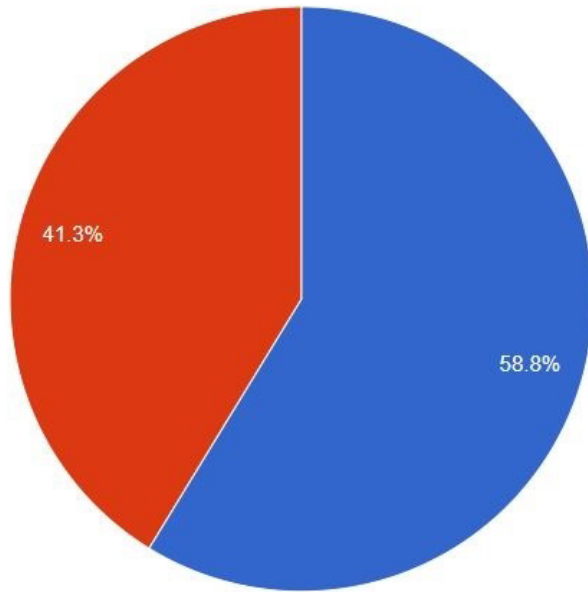


Figure 4: Community Survey results

Which County do you reside in?

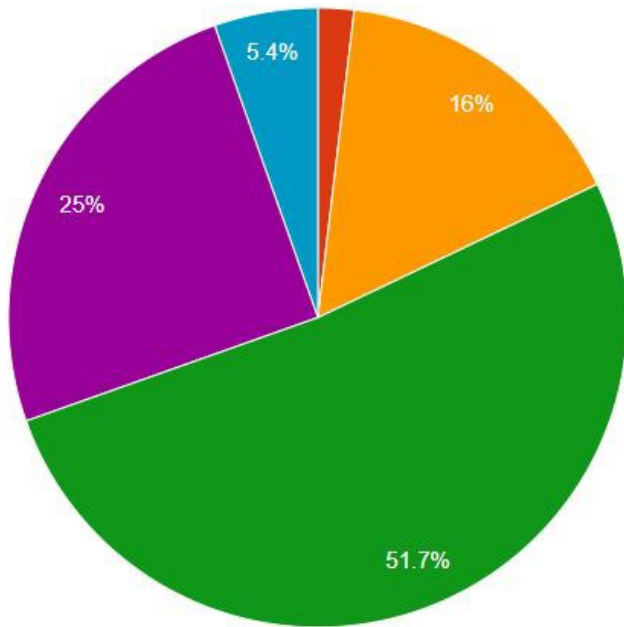


- Escambia County
- Santa Rosa County

**480 Surveys were received from the Communities**

Figure 5: Community Survey - County of residence

Age



- 18 - 24
- 25 - 39
- 40 - 64
- Over 65
- No Answer

Figure 6: Community Survey - respondent age

### Race/Ethnicity

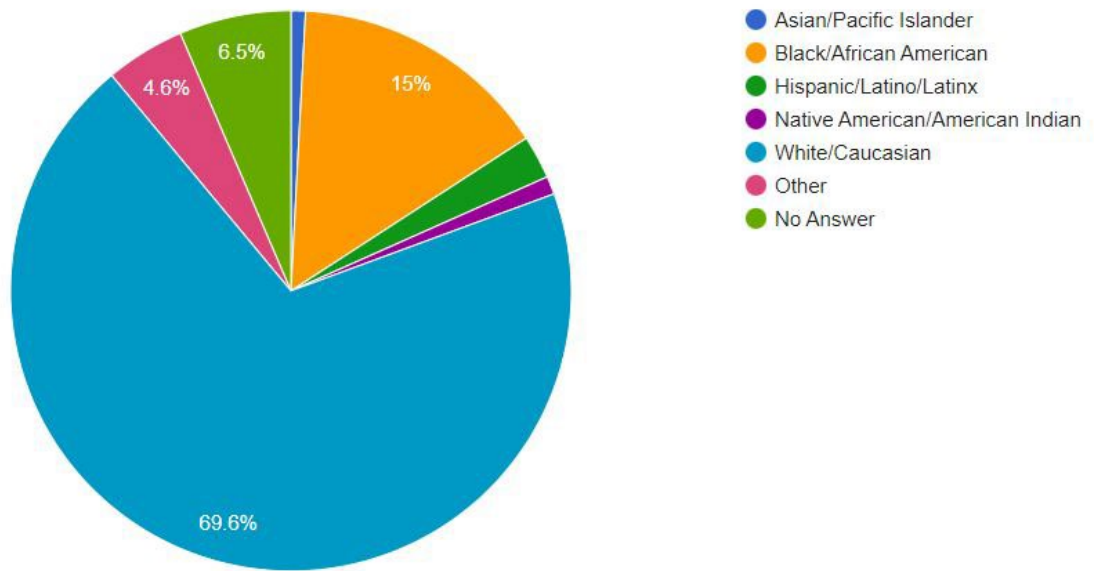


Figure 7: Community Survey - respondent race/ethnicity

### Income Range

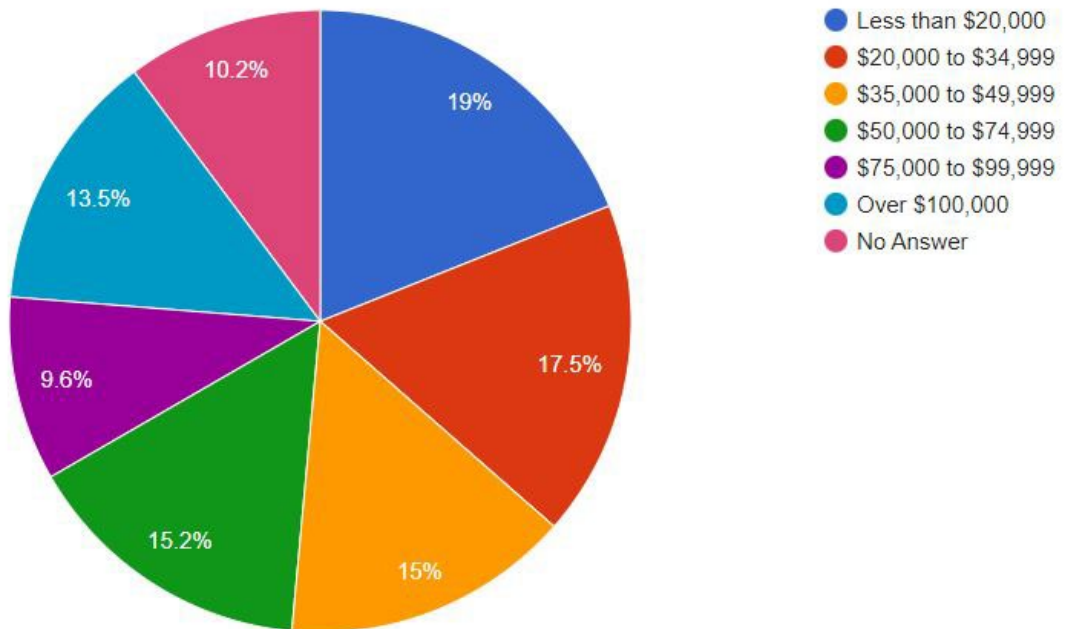


Figure 8: Community Survey - respondent household income

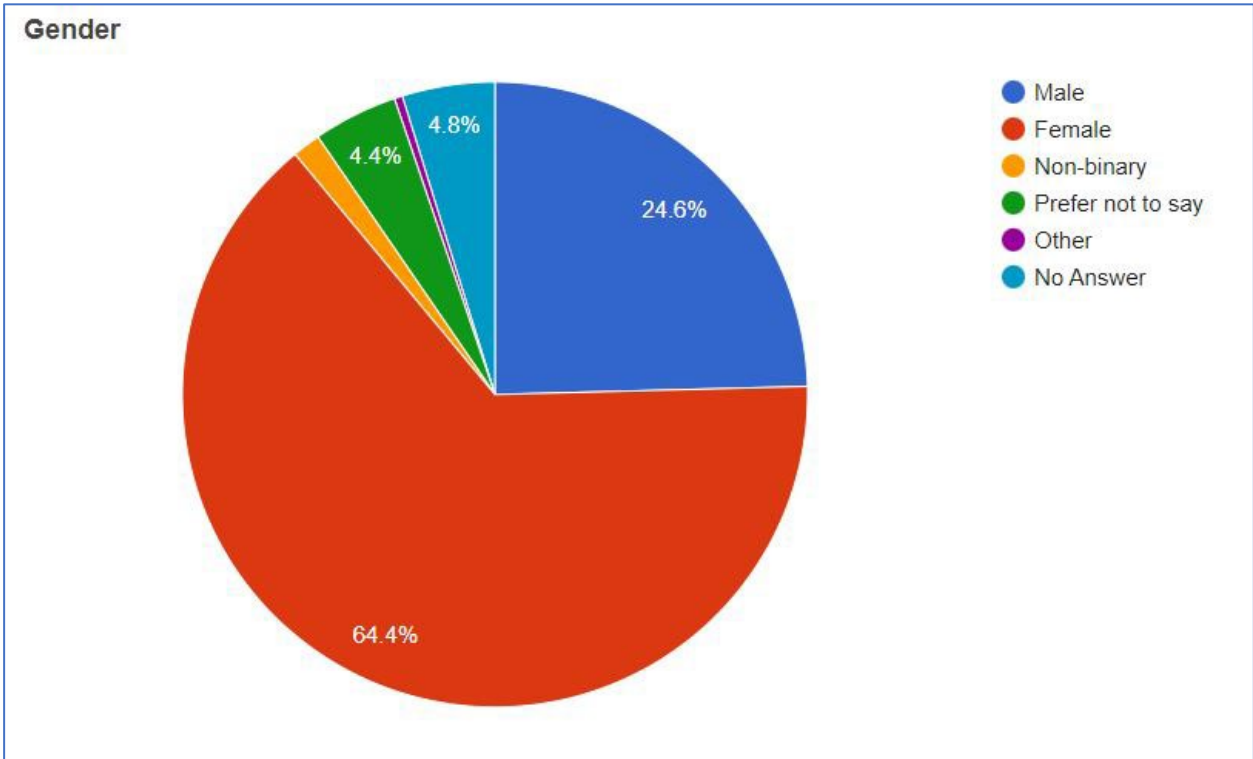


Figure 9: Community Survey - respondent gender

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

Enter narrative response here.

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## Needs Assessment and Gaps Analysis

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

Qualifying populations within the Consortium include persons experiencing homelessness, households at risk of homelessness, persons fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other populations. Other populations include very low-income households at or below 30% AMI (at-risk of homelessness), households requiring services or housing assistance to prevent homelessness, households with income between 30-50% AMI experiencing one or more severe housing problems, and veterans and families that include a veteran family member that meet the one of other criteria described.

Homeless Needs Inventory and Gap Analysis data was gathered from the Continuum of Care Housing Inventory County (HIC) and Point in Time Count (PIT). The CoC noted the pandemic prevented an unsheltered PIT Count in 2021. At the time of the 2022 Point in Time Count, there were a total of 727 individual persons experiencing homelessness within the FL-511 Pensacola/Escambia, Santa Rosa Counties CoC region. Of the 727 individuals experiencing homelessness, 360 individuals (49.6%) were residing in a sheltered location and 367 individuals (50.5%) remained unsheltered. Persons identifying as White and Black/African American are represented at similar rates within the crisis response system, as identified during the 2022 PIT Count.

Person fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking, as defined by HUD, are also a sector of qualifying population. At the time of the 2020 Point in Time Count, 50 sheltered and unsheltered persons experiencing homelessness identified were also victims of domestic violence.

The at-risk of homelessness sector of Qualifying Populations is defined in 24 CFR 91.5. Characteristics attributed to housing instability and increased risk of homelessness include: having a household income between 0-30% AMI, experiencing severe housing cost burden, a person with a disability living along on a fixed income, household members with physical disabilities and other chronic health issues, poor credit and/or no credit history, and households with a family member who has a record of criminal history. The Housing Needs Inventory and Gap Analysis identified 3,645 renter households within the County experiencing one or more severe housing problems with very low income at or below 30% AMI. Households within the 0-30% AMI income category are most impacted by severe cost burden. Other renter households, Elderly owner households, and Small Related owner households are the household types most impacted by housing severe cost burden. Renters are disproportionately affected by severe cost burden in Escambia County. Approximately 73% of Hispanic households and 72% of Black/African American households at the below 30% AMI income level have at least one of the four severe housing problems, which is a rate higher than the jurisdiction as a whole.

Additionally, there are 2,695 renter and 2,158 owner households, totaling 4,853 households, with zero/negative income meaning that they cannot be cost burdened but may still require housing assistance. These households are a qualifying population at-risk of homelessness. The Housing Needs Inventory also identified 18,635 renter households with income between 30-50% AMI.

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

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

The unmet housing and service needs of qualifying populations include but are not limited to availability of non-congregate shelter (NCS) units, provision of supportive services, and availability of affordable rental housing units. Supportive services are needed to help transition households into safe and sustainable housing. Supportive services can take the form of housing counseling, financial assistance, financial counseling, Tenant Based Rental Assistance (TBRA) and employment services.

Sheltered and unsheltered homeless populations need access to non-congregate shelter (NCS) units. Overall, 50.5% of persons experiencing homelessness reside in an unsheltered location. Additionally, 252 persons experiencing homelessness disclosed having a Severe Mental Illness (SMI). Of these persons, 25 persons with SMI were sheltered at Emergency Shelter, 43 in Transitional Housing, and 184 remained unsheltered. There were 220 persons with chronic substance abuse disorder, of whom 24 were located at Emergency Shelter, 18 in Transitional Housing, and 178 individuals remained at an unsheltered location. There were 7 individuals experiencing homelessness who self-disclosed being a person with an HIV/AIDS diagnosis and none are in Emergency Shelter, 2 in Transitional Housing, and five staying in an unsheltered location at the time of the Count. An increase in shelter units would address the unmet need of 50.5% of persons experiencing unsheltered homelessness.

Additionally, there is an unmet need for supportive services. Within the sheltered and unsheltered homeless population, 252 persons disclosed having a Severe Mental Illness (SMI). Additionally, 7 persons experiencing homelessness disclosed being a person with HIV/AIDS diagnosis. Furthermore, 66 persons experiencing homelessness were also Victims of Domestic Violence. Of the 66 Victims of Domestic Violence experiencing homelessness, 22 persons were staying at an emergency shelter, 7 persons were staying in Transitional Housing, and 37 persons were staying in an unsheltered location. These persons would benefit from both emergency shelter units and supportive services.

The unmet needs for the populations at risk of homelessness include resources for rental or utility deposit assistance and development of affordable rental housing units. The housing problems affecting most renters and homeowners in Escambia County are housing cost burden

and severe cost burden. Elderly households are at greatest risk of experiencing cost burden. These households living in Escambia County require access to financial support to obtain and maintain housing. Additionally, an increased stock of available and affordable housing units would alleviate this unmet need. Other resources such as supportive services for economic development, housing counseling, and workforce development training or employment opportunities that would increase household income could also address the unmet housing needs of the qualifying population.

Other Populations that qualify include those at risk of housing instability or in unstable housing situations. The populations at greater risk of housing instability or in unstable housing situations due to limited income and high service needs to support independent living are elderly, persons with disabilities, persons reporting substance abuse, and victims of domestic violence.

**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:**

Current resources available to assist the unmet housing and service needs of qualifying populations include but are not limited to affordable housing rental units, supportive services, rent and utility deposit assistance, and employment opportunities.

Opening Doors NWFL, the local area Continuum of Care (CoC), manages the HMIS reporting as well as the Coordinated Entry Program. In addition, the City of Pensacola Housing Department, in cooperation with Opening Doors, the U.S. Department of Housing and Urban Development designated Continuum of Care agency, to administer the Emergency Housing Vouchers program in Escambia County. These special purpose vouchers are available to the Individual or families experiencing homelessness; at risk of experiencing homelessness; Fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or were recently homeless and for whom providing rental assistance will prevent the family's homelessness or having a high risk of housing instability.

For persons still housed and at-risk of losing their housing, homeless prevention assistance is available through Escambia County Community Resource. The Escambia County Community Resources homeless prevention services aim to prevent people from becoming literally homeless and may include financial assistance for rent, mortgage, or utilities, case management, assistance with budgeting, and financial counseling to prevent homelessness. If the household is evicted, the CoC may divert the individual using best practices, mediation services, financial assistance, budgeting/financial counseling, and identifying other temporary housing resources such as friends or family to prevent entrance into the housing crisis response system.

Households that are fleeing from domestic violence can access shelter and counseling services to support their housing needs, and referrals to CoC-funded permanent housing projects. Survivors of domestic violence are linked to Substance Abuse & Mental Health SAMH services, as needed, in addition to counseling services. Households at-risk of homelessness due to limited income, especially those whose income is at or below 30% AMI, may be eligible for time-limited financial assistance. This offers the household an opportunity to stabilize their housing situation

through community supports and increasing financial stability to prevent future episodes of homelessness. Households with insufficient resources to attain housing stability, such as lacking resources for rental or utility deposits, may seek resources through their service provider to help with financial assistance. Support services such as budgeting may also be provided. When a person is transitioning out of an institutional care setting and into community integrated, independent living, discharge planning to Certified Recovery Residences, transitional housing programs, or independent living options with or without housing subsidies that offer community-based supports are integral to obtaining and maintaining housing.

Households participating in Pensacola/Escambia, Santa Rosa County's Rapid Rehousing (RRH) programs can receive supports to achieve educational and employment goals to ensure that, upon exit from the time-limited program, the household income is substantial enough to continue supporting the housing expenses. Increased economic independence will prevent future episodes of homelessness, as the household can maintain the lease agreement. While the RRH strategy incorporates support services, the case manager tasked with providing housing stabilization supports, it is also necessary to link the participant to on-going services that will enhance their ability to maintain their housing.

During the upcoming 2021-2025 five-year Consolidated Plan, Escambia County aims to address affordable housing needs that target households comprised of families, elderly, persons with disabilities, homeless persons, or persons at-risk of becoming homeless, and persons with special needs.

The Local Housing Assistance Plan (LHAP) outlines the strategy for the State Housing Incentive Partnership (SHIP) program, passing through state HTF dollars to Escambia County for rental and homeownership activities aimed at extremely low, very low, low, and sometimes moderate-income residents. Eligible activities through the SHIP program include:

- Owner-occupied Activities
- Multifamily Rental Housing Development

The Continuum of Care (CoC) receives HUD's Emergency Solutions Grant (ESG) Program. Under this program, the County directs funds for Emergency Shelter Operations and Services and the Homeless Management Information System (HMIS) database with the local homeless Continuum of Care, lead, Opening Doors Northwest Florida, Inc. Additionally, funds are utilized for short-term rental assistance, security and utility deposits, and associated eligible activities for income eligible homeless households under the Rapid Re-housing and Homelessness Prevention strategies. The City of Pensacola administers HUD Veterans Affairs Supportive Housing (VASH) vouchers County-wide to provide homeless veterans with housing choice vouchers as well as Department of Veterans Affairs supportive services. Under the Rental Development activity, the County will seek set-asides of units specifically for homeless households.

Additionally, resources are available to the Qualifying Populations through a special allocation to prevent and respond to the spread of COVID-19. Qualifying Populations are

disproportionately impacted by COVID-19. Escambia County received the Community Development Block Grant CARES Act (CDBG-CV). The funds provide emergency mortgage and utilities assistance payments to low- and moderate-income residents for up to three months of past due bills. The Emergency Assistance Program was created to respond to unforeseen economic hardship created by the coronavirus. The goal of the Program is to provide emergency subsistence payments to low- and moderate-income residents of the Unincorporated Escambia County in danger of becoming homeless as a result of a hardship, verifiable loss of income, inability to pay monthly mortgage or utilities.

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

The current Homeless Needs Inventory and Gap Analysis data gathered from the 2022 Continuum of Care Housing Inventory Count (HIC) shows there is a need to continue to invest in shelter and housing for the homeless population to maintain level of service. Although the pandemic prevented a Point in Time Count in 2021, the HIC identified 367 unsheltered homeless adults without children. The current Homeless Needs Inventory Gap Analysis shows a surplus of 196 Family beds in emergency shelter, transitional housing, and other permanent supportive housing compared to homeless population of Family households with at least 1 child. The majority of the beds are the adult-only 400 beds in 65 family units of emergency shelter, followed by 233 beds in 3 family units of permanent supportive housing and 230 beds in 0 family units of transitional housing.

Households at or below 50% AMI are most impacted by cost burden and the gap in affordable housing options. The County and its residents will benefit from investment in activities that will create new homes for homeownership and support rental assistance and the creation of rental units for households maintaining lower income. The demand for housing subsidies administered through PHAs exceeds supply, and with the right supports for existing housing participants that enhance the opportunity for economic mobility, PHA voucher holders can transition from housing subsidy programs to market-rate rentals, allowing for new low-income residents the opportunity to receive the benefit. The jurisdiction needs an additional 700 rental units per year to address the current cost burden gap. Homebuyer assistance and housing subsidies remain limited, creating barriers for housing choice among a substantial majority of residents within the jurisdiction who cannot achieve homeownership and rely on the supply of housing affordable to their income.

***Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:***

Not Applicable. The PJ is not including additional characteristics.

***Identify priority needs for qualifying populations:***

The priority needs for the qualifying populations are acquisition and development of non-congregate shelters and development of affordable rental housing. Community integrated housing opportunities are essential for persons with special needs. Implementation of best practices, specific to that person's individual needs, is essential to a person's stability, recovery, and ability to maintain independent living. The most vulnerable community members often overlap between multiple service systems and their needs should be consumer-identified and supported through a multi-disciplinary approach to help a person achieve stability and improve their quality of life. Non-congregate shelters provide units addresses the need for units for the homeless population. A significant portion of the qualifying population experiencing homeless are single adults without children. While a portion of Therefore, the non-congregate shelter units will address the gap in individual shelter units and increase homeless shelter options for this population. DCF's 2019-2020 Annual Capital Needs Assessment identifies a need for increased emergency shelter and transitional housing capacity to provide services to persons fleeing domestic violence. The greatest need for populations at-risk of Homelessness with incomes of 30-50% AMI is rental assistance to relieve severe cost burden

The largest gap the Qualifying Populations are facing is access to affordable rental housing units. As shown in the Housing Needs Inventory Gap Analysis Tables, there is a deficit of 6,290 housing units available to the Qualifying Populations. Demand also surpasses the supply of zero- and one-bedroom rental units in the jurisdiction. Development of affordable rental housing of this type is needed to transition many individuals out of assisted and/or temporary housing into permanent market-rate housing affordable at their income level.

***Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:***

The housing needs of the qualifying populations were determined as previously described through gaps analysis of current services and the needs assessment gathered by the Consortium.

## **HOME-ARP Activities**

### **Template:**

***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:***

On January 19, 2023, the Escambia Board of County Commissioners approved the activity allocations for the County's HOME-ARP funding. The allocations were approved as follows:

- 70% Non-congregate Shelter
- 12% Affordable Rentals Housing Development
- 9% Professional Supportive Services
- 9% Professional Services and Administration

Escambia County Neighborhood and Human Services (NHS) Department staff will directly manage the acquiring and rehabilitation of the non-congregate shelter. For the rehabilitation

work on the shelter, the County shall follow its procurement standards which comply with all applicable Federal and State guidelines—adhering to the most stringent when guidelines diverge. Likewise, NHS staff will also follow established procurement policy to solicit bids for the construction of new affordable rental housing, or the rehabilitation of affordable rental housing units. For Supportive Services, the County will maintain equity and transparency in working with existing local vendors and non-profit partners to include the local Continuum of Care which serves the entire consortium area.

***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:***

Funds were not provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan. A subrecipient or contractor is not responsible for the administration of the County’s entire HOME-ARP grant.

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.

**Template:**

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 372,217.50	9%	
Acquisition and Development of Non-Congregate Shelters	\$ 2,895,025	70%	
Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing	\$ 496,290	12%	
Non-Profit Operating		#	5%
Non-Profit Capacity Building		#	5%
Administration and Planning	\$ 372,217.50	9 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 4,135,750</b>		

***Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:***

As outlined in the Public Participation section, Escambia Consortium is maintaining a consistent approach to the allocation of these funds as per the public input received. Below is a breakdown of activities:

- Approximately \$372,217.50 are being directed towards an expansion in supportive services to accompany the non-congregate shelter and related needs as determined by local partners.
- Approximately \$2,895,025 are being directed towards the acquisition and rehabilitation of a non-congregate shelter.
- Approximately \$496,290 are being directed to directly increase the quantity of affordable rental units in the County.
- Approximately \$372,217.50 in funding will be set aside for administration and planning.

***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:***

As outlined in the guidelines, HOME-ARP funding is restricted to several areas of support; tenant based rental assistance, development and support of affordable housing, provision of supportive services, and the purchasing and development of (a) non-congregate shelter(s). Through the County’s needs assessment and gap analysis, we determined that the most beneficial usage of these funds would be to acquire/rehabilitate an existing structure to create a non-congregate shelter, to add in and/or increase supportive services to said shelter, and to create additional affordable housing units.

Like many local governments in the State, Escambia County and the other participating jurisdictions within the consortium haven’t been immune to skyrocketing housing and rental prices. As a result, many area families can no longer afford stable and consistent housing which is leading to many families experiencing homelessness. With the construction of new affordable units and the opening of a non-congregate shelter, we can ensure effort is made to lessen the extent of this issue and to keep those currently experiencing homelessness safe.

## **HOME-ARP Production Housing Goals**

### **Template**

***Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:***

Escambia County estimates that they can provide approximately 50 non-congregate shelter rooms through the acquisition and rehabilitation of an existing structure. Additionally, staff estimates that at least four units of affordable rental housing can be constructed for families in need. It is our hope that this funding may be leveraged with other sources such as SLFRF and SHIP to add in additional units under a similar strategy.



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

Escambia County will serve some of the area's most vulnerable populations via the construction of affordable rental units. Staff aims to assist households that are at-risk of experiencing homelessness by serving those whose incomes are 50% of Area Median Income (AMI) or below. The goal will address the affordable rental housing unit deficit and relieve the cost burden disproportionately felt by the qualifying populations.

## Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects, when available, are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

### **Template:**

***Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:***

- Preferences will be made for persons experiencing homelessness for the non-congregate shelter as well as the supportive services that will coordinate. The method of prioritization will be established in coordination with the CoC and the PJ will submit a plan amendment if/when these are established.
- No preferences will be identified for the rental housing development.

***If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Preferences will be made for persons experiencing homelessness for the non-congregate shelter as well as the supportive services that will coordinate.

### **Referral Methods**

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in

its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

**Template:**

***Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):***

Not applicable as no referral methods were identified.

***If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):***

Not applicable as no referral methods were identified.

***If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):***

Not applicable as no referral methods were identified.

***If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):***

Not applicable as no referral methods were identified.

### **Limitations in a HOME-ARP rental housing or NCS project**

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

### **Template**

***Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:***

Not applicable. The PJ does not intend to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population.

***If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Not applicable. The PJ does not intend to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population.

***If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):***

Not applicable. The PJ does not intend to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population.

## HOME-ARP Refinancing Guidelines

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***  
Not applicable. Escambia County does not intend on using HOME-ARP funds to refinance any existing debt.
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***  
Not applicable. Escambia County does not intend on using HOME-ARP funds to refinance any existing debt.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***  
Not applicable. Escambia County does not intend on using HOME-ARP funds to refinance any existing debt.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***  
Not applicable. Escambia County does not intend on using HOME-ARP funds to refinance any existing debt.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***  
Not applicable. Escambia County does not intend on using HOME-ARP funds to refinance any existing debt.
- ***Other requirements in the PJ's guidelines, if applicable:***  
Not applicable.

## **Glossary of Terms**

**AAP** : Annual Action Plan ,document establishing the community development/redevelopment activities anticipated to be funded through the HUD annual allocation to the County.

**AMI** : Area Median Income, gross household income statistic which is one criteria of a household's qualifying for assistance through HUD programs.

**ARP** : American Rescue Plan, funded by an act of Congress to address economic impacts of the COVID-19 pandemic.

**CDBG** : Community Development Block Grant, funds received annually for community development/redevelopment activities based on appropriations of the Federal government Department of Housing and Urban Development.

**CE** : Coordinated Entry, an organized, collaborative program to efficiently provide needed services to households experiencing homelessness or at-risk of homelessness.

**CoC** : Continuum of Care, a coalition of community organizations which provide a variety of services to those in the area experiencing homelessness, led by Opening Doors of Northwest Florida.

**HMIS** : Homeless Management Information System, local/regional database which provides information on available services and collects information on services provided to households experiencing homelessness or at-risk of homelessness.

**HOME** : HOME Investments Partnership Program, funds received annually for affordable housing development and preservation activities based on appropriations of the Federal Government Department of Housing and Urban Development.

**HUD** : The United States Department of Housing and Urban Development.

**NCS** : Non-Congregate Shelter, temporary housing providing households with individual, secure room(s) with individual full bathroom.

**NED** : Neighborhood Enterprise Division of the Neighborhood and Human Services of Escambia County.

**PHA** : Public Housing Authority.

**PJ** : Participating Jurisdiction, a unit of general local government pursuing community development/redevelopment activities funded by Federal, State and local dollars.

**SHIP** : State Housing Initiatives Partnership, State funding allocated annually by the Florida legislature to support affordable housing efforts.

**TBRA** : Tenant Based Rental Assistance, funded rental assistance available for a household to select an available, qualified rental unit of their choice.

**VASH** : Veterans Affairs Supportive Housing, funded vouchers for assistance in rent/mortgage payments for qualified veterans.