



SUBSTANTIAL AMENDMENT
2021-2022 ANNUAL ACTION PLAN
HOME-ARP FUNDS

Background:

On March 11, 2021, the American Rescue Plan Act of 2021 (ARP) was passed to provide support for individuals experiencing homelessness, are at risk of homelessness, and vulnerable populations through housing and supportive services. Through ARP, the City of Norwalk was eligible to receive additional funds through the HOME Investment Partnerships Program (HOME-ARP) administered through the United States Department of Housing and Urban Development (HUD). Eligible activities include providing supportive services, affordable housing, non-congregate shelter (NCS), and tenant-based rental assistance (TBRA). Per 24 CFR 570.200(h) and 24 CFR 92.212(b), the City is required to amend the 2021-2022 Annual Action Plan as a request for HOME-ARP pre-award costs.

In accordance with the City's Citizen Participation Plan, a substantial amendment to the Annual Action Plan is required when the City:

- Changes allocation priorities
- Expects to carry out a new or existing activity while using funds that has not been covered by the Consolidated Plan or included in the approved Action Plan;
- Allocates a substantial change (by \$35,000, except for planning and administration) in funds; or
- Modifies the location, scope, purpose, or recipients of an activity.

Proposed Amendment to 2021-2022 Annual Action Plan:

The City will allocate additional \$1,231,940 of HOME-ARP funds to design, construct, and operate a permanent affordable housing development in the Norwalk Entertainment District with an experienced housing development organization. These funds will be used to support the development of affordable units specifically for veterans experiencing homelessness and individuals within 30 to 80 percent of the area median income. Mental health and homeless services will also be provided at the housing development.

Lastly, the affordable housing production activity is aligned with the City's Consolidated Plan, which is to provide decent, affordable housing and support special needs programs and services.



SUBSTANTIAL AMENDMENT
2021-2022 ANNUAL ACTION PLAN
HOME-ARP FUNDS

These activities are eligible under HOME-ARP and would greatly assist the City of Norwalk provide affordable housing for their residents and support unhoused veterans.

Public Comments:

The City of Norwalk will address and incorporate comments received during the 30-day public commenting timeframe between February 1, 2023 and March 3, 2023. A public hearing will be held on March 7, 2023.



City of Norwalk

HOME-ARP ALLOCATION PLAN

DRAFT

January 2023

CONTENTS

Consultation 2

Public Participation..... 4

Needs Assessment and Gaps Analysis..... 5

HOME-ARP Activities 12

HOME-ARP Production Housing Goals 14

Preferences 14

HOME-ARP Refinancing Guidelines..... 15

CONSULTATION

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

Summarize the consultation process:

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

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Jovenes, Inc	Homeless Service Provider	Interview	See Summary.

City of Norwalk Social Services, City of Norwalk Community Development	Public Agency addressing the needs of qualifying populations	Homeless Taskforce Meeting	See Summary.
Los Angeles Homeless Services Authority (LAHSA)	Homeless Service Provider, Public Housing Authority	Interview	See Summary.
Su Casa – Ending Domestic Violence	Domestic Violence	Interview	See Summary.
Volunteers of America Los Angeles	Veterans		
Continuum of Care	Homeless Service Provider, Public Housing Authority	Meeting	See Summary.
Norwalk Housing Authority	Public Housing Authority	Interview	See Summary.
Fair Housing Foundation	Organization addressing fair housing, civil rights, or persons with disabilities	Interview	See Summary.

Consultations Summary

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

When asked to rank the needs of qualifying populations, the top choice across all interviews was more support for Tenant-Based Rental Assistance (TBRA). This was followed closely by Development of Affordable Rental Housing, and Acquisition and Development of Non-congregate Shelters and Interim Housing to round out the top three

needs for the City. The most commonly cited gap within service provision or housing inventory was found to be Lack of Emergency Shelter Beds.

The top four priority needs for supportive services, according to respondents, was Mental Health Services, Drug Abuse/Addiction Services, Domestic Violence Services, and Female Head of Housing Programs. Organizations that were consulted indicated a rate of 80% likelihood to apply for Homeless Prevention Services Funding, and a 60% likelihood to apply for Housing Counseling Funding. All organizations said housing counseling services such as housing search, landlord/tenant rights, budgeting, and credit education/repair programs have a significant impact on the community. Organizations stated that clients risk losing their homes if they are not informed of their housing rights, and that knowledge regarding credit is extremely important for qualifying for housing. This training was also stated to help clients locate affordable housing, which is difficult. Clients face barriers to entry including first/last month's rent, established credit, and references.

When asked about the City supporting a new affordable housing development proposal, respondents said that funding from HUD, Los Angeles Homeless Services Authority, Department of Human Services, Veterans' Affairs, and Department of Mental Health.

PUBLIC PARTICIPATION

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

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

- **The amount of HOME-ARP the PJ will receive:** \$1,231,940
- **The range of activities the PJ may undertake:** Permanent Affordable Housing plus administrative costs.

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: Public commenting period began February 6, 2023 and ended February 21, 2023.
- Public hearing: The public hearing was held on March 7, 2023.

Describe any efforts to broaden public participation:

The City of Norwalk encouraged public participation of the HOME-ARP Allocation Plan and considered any comments or views of residents received in writing, or orally, at a public hearing. Additionally, public meetings were held with stakeholders; an online survey was made available in newspapers; and a final public hearing was held.

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

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

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

All comments were accepted.

NEEDS ASSESSMENT AND GAPS ANALYSIS

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					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	256		537		0								
Transitional Housing	528		1,149		368								
Permanent Supportive Housing	70		726		206								
Other Permanent Housing													
Sheltered Homeless							1,269						
Unsheltered Homeless						248	3,512	110	1497				
Current Gap												1,100	

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

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	9,810		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,025		
Rental Units Affordable to HH at 50% AMI (Other Populations)	2,485		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		2,220	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,270	
Current Gaps			1,810

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

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

Homeless as defined in 24 CFR 91.5

As identified in the 2022 Point In Time report prepared by Los Angeles Homeless Services Authority and its partners, a total of 4,781 unhoused individuals lived in Service Planning Area 7 (SPA 7), where the City of Norwalk is located, which is 7.3 percent of the total number in Los Angeles County. Of the 4,781 unhoused, 3,512 were unsheltered (73.5 percent) and 1,269 sheltered (26.5 percent). Unsheltered homeless are individuals or families not housed in a shelter and whose primary nighttime residence is public/private place not designed for or ordinarily used as a regular sleeping accommodation for human beings. These are people living on the street or in makeshift shelters (tents, boxes), motorhomes (RV), vans, or cars. Sheltered homeless are individuals or families living in a supervised operated shelter to provide temporary living arrangement.

The Report identified 311 homeless individuals in the City limits of Norwalk, but it did not provide information specific to the City of Norwalk on demographic composition. This is an increase since 2020, when there were 168 homeless individuals. A Point-In-Time count was not conducted in 2021 due to the spread of the infectious disease, Coronavirus Disease 2019 (COVID-19).

At Risk of Homelessness as defined in 24 CFR 91.5

As shown above in the Housing Needs Inventory and Gap Analysis Non-Homeless Table, there are significant totals of at-risk homeless within Norwalk. First, there are a total of 1,025 occupied or for-sale rental units within the City that are affordable for households making 0-30% AMI. However, there are 2,835 renters in the City in this income bracket. That creates a gap of 1,810 households that will struggle to find housing that is affordable within this income group, which is defined as at-risk of homelessness. Additionally, of these 2,835 renters, a total of 2,220 (78.3 percent) already experience a Severe Housing Problem, such as Severe Housing Cost Burden. For Norwalk, households in this income group (0-30% AMI) are more likely to be minority households.

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

The Point in Time count report specified 1,497 individuals that were victims of domestic violence within SPA 7.

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

As described in Norwalk's Consolidated Plan, supportive housing services are needed for the City's elderly (16,070 individuals, 15.3% of the City population), persons with

disabilities (10,225 individuals, 9.8% of the City population), developmentally disabled persons, veterans (2,523 individuals, 3.2% of the City population), persons with addictions, and those living with HIV/AIDS. Elderly persons may require long-term supportive housing that includes long-term assisted living, transportation, and nursing care. While many disabled persons can live and work independently within a conventional housing environment, more severely disabled individuals require a group living environment where supervision is provided. The most severely disabled individuals may require an institutional environment where medical attention and physical therapy are provided. Those suffering from substance abuse may require counseling or case management and a short-term housing solution while undergoing rehabilitation. Other more challenging or on-going conditions may require supportive services that include long-term assisted living, as well as transportation and nursing care. Persons with HIV are often able to live independently as advances in medical treatment enable persons with HIV to lead normal lives. However, persons living with AIDS may require long-term supportive housing as their health conditions deteriorate and impact their ability to work. The Point-in-Time count identified 30 individuals that were HIV/AIDS positive and homeless in SPA 7.

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

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

While homelessness is a complex problem with many causes, the high cost of housing is a significant contributor. Rising housing costs that have exceeded growth in wages, particularly for low-income households, put Norwalk residents at risk of housing instability and homelessness. To measure the number of homeless persons in Norwalk, the City relies on point in time surveys prepared by the Los Angeles Homeless Services Authority and participating partners. Population estimates for people experiencing homelessness are difficult to quantify. Census information is often unreliable due to the difficulty of efficiently counting a population without permanent residences. Given this impediment, local estimates of the homeless and anecdotal information are often the source of population numbers. As stated earlier however, there is a population of 311 homeless individuals in Norwalk as of the 2022 Point in Time Count, and a potential gap of affordability for 1,810 at-risk households. There is also an extremely high proportion of at-risk families (78.3%) that already experience severe housing problems. These populations are in the most unstable housing situations.

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:

Los Angeles County Department of Mental Health is the primary resources for the mentally ill. Behavioral Health Services include psychiatric evaluation, medication management, specialty mental health services, as well as comprehensive case management services to individuals and families. The program serves children and adults, who have acute or severe and chronic behavioral health issues as well as those who have experienced significant impairment due to a mental illness.

Primary services needed by persons with alcohol or other drug addiction include health care and detoxification programs. Some unsheltered individuals may use alcohol and drugs and experience addiction problems. The patient fees at most treatment centers for substance abuse are expensive and preclude treatment for homeless persons. The Los Angeles County Department of Mental Health provides substance abuse resources for the homeless. Substance abuse counseling and treatment centers serving Norwalk, include the following:

- *Alcoholics Anonymous*, Commonwealth Ave # D Fullerton, CA 92831-4634
- *Alcoholics Anonymous*, Avenue Huntington Park, CA 90255-4721
- *Action Alliance Sober Living*, 133 West Chapman Avenue Fullerton, CA 92832-1451
- *Little House*, 9718 Harvard St., Bellflower, CA 90706

The City's Social Services Department (SSD) offers public assistance programs and services designed to assist low-income residents and those in need of emergency shelter or food. According to SSD, motel vouchers are issued for up to three (3) nights, depending on the circumstance, for emergency lodging for persons in need of temporary shelter. Often times, individuals seek this service due to loss in wages; need a place to sleep while waiting to be admitted into a homeless shelter; inability to afford shelter for themselves and family for a short period of time; or the person is chronically homeless and is in need of a place to get cleaned up and rest. The City has an agreement with the Guesthouse Inn and Best Western Inn to allow persons with City-issued vouchers to stay at those inns. Prior to entering this agreement, SSD staff conducted inspections to ensure that the establishments were clean and safe.

Many of the constituents who seek assistance from SSD live at motels. They come in for food assistance, dispute resolution regarding complaints about the living conditions at motels, advocacy assistance for services through other agencies, and referral to drug/alcohol rehabilitation facilities, homeless shelters, medical treatment facilities and other public agencies.

The City has taken additional efforts to address the homelessness problem by collaborating with the Gateway Cities Council of Governments (COG), Gateway Connections Program, to offer housing and services to persons who are homeless.

This program, along with the Social Services and Community Development Departments and the Authority, serves as a bridge between those who are in need and resources that are available.

In addition, the COG will set up an online Homeless Prevention Community Resource Database. The homeless prevention community resource database will be an online resource for service seekers and community partners to find housing and services in and around the 27 Gateway communities. The system will be designed to provide preventative information to those who are at risk of homelessness, and housing and services information to those who are homeless.

The database will provide multiple points of entry for service seekers so they can find services online, receive assistance from City staff, community-based organizations, and faith-based organizations, or any other community members with Internet access. The COG will confer with the director of socialserve.com, the developer of the LA Housing Resource Database, to determine if a Gateway specific can be accomplished. This will leverage and expand an existing resource for the County.

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

As shown in the Housing Needs Inventory and Gap Analysis Homeless Table, there is a lack of Emergency Shelter, Transitional Housing, and Permanent Supportive Housing in SPA 7. Within this area, there are only 2,412 emergency shelter beds, transitional housing beds, and Permanent Supportive Housing beds within this area despite there being 3,512 unsheltered homeless. This leaves a gap of 1,100 beds for individuals. As stated in the other Non-Homeless Table, there is a gap of affordable housing options for 1,810 households.

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

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

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

Disabled - Disabled individuals would require not only housing assistance in the form

of rental and mortgage subsidies, but also group housing with accessibility features that would be ideal for people with mobility issues and sensory limitations. Their housing needs will also require ease of access to transit, shopping and healthcare facilities. They may also require specialized medical care and education, especially for the developmentally disabled. Additionally, disabled individuals who have been discharged from medical/healthcare facilities might also need transitional housing.

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

Identify priority needs for qualifying populations:

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

- Provide decent affordable housing;
- Maintain and promote neighborhood preservation;
- Support special needs programs and services;
- Construct or upgrade public facilities and infrastructure;
- Create public awareness of fair housing; and
- Create job generating businesses and job training.

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

These gaps were determined from data provided by 1) Point in Time Counts; 2) Housing Inventory Counts, American Community Survey (ACS) Data; and 3) Comprehensive Housing Affordability Strategy (CHAS) Data. The Sources 1 and 2 showed the existing homeless populations, and the existing housing they may access. The Source 3 identified additional populations based on income and housing problems. These populations are at higher risk of becoming homeless. There is a need for housing inventory and service systems to account for these at-risk populations as well, to avoid becoming overrun.

HOME-ARP ACTIVITIES

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

The City of Norwalk intends to work in partnership with a housing development organization to design, construct, and operate a permanent affordable housing development to be located in the Norwalk Entertainment District. The City is providing land for a mixed-use development that can accommodate over 300 residential units of which an estimated 65-70 rental units will be affordable (30-80% AMI). HOME funds will be dedicated to 12 units below 50% AMI. A portion of those rental units will house homeless veterans as well as veteran families with children. The affordable rental units will provide housing for low- and moderate-income residents having an affordability covenant of 55 years. The City intends to support the housing developer with their future funding needs including state affordable housing tax credits (9%), LACDA Capital funding and City HOME-ARP funds. The City intends to release a Request For Proposals for needed wrap-around social services. Not including administrative funds, the City intends to dedicate 100% of their remaining HOME-ARP funds to this project.

If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Not applicable.

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

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ #		
Acquisition and Development of Non- Congregate Shelters	\$		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ 1,047,149		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 184,791	15 %	15%
Total HOME ARP Allocation	\$ 1,231,940		

Additional narrative, if applicable:

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The City of Norwalk has a high level of need for additional affordable housing units for many different qualifying populations. As shown previously in the Needs Analysis and Gap Analysis, there is a currently existing gap of 1,810 affordable rental housing units for low-income individuals. Additionally, there are 110 unsheltered veterans. As a result, the City of Norwalk intends to work in partnership with a housing development organization to design, construct, and operate a permanent affordable housing development located in the Norwalk Entertainment District specifically serving unhoused veterans and those within the 30 to 80% area median income (AMI). The City is providing land for the development that can accommodate an estimated 65-70 rental units. The City intends to support the housing developer with their future funding needs including state affordable housing tax credits (9%), Los Angeles County Development Authority (LACDA) Capital funding and City’s HOME-ARP and existing HOME funds.

For future funding considerations, the City will utilize Community Development Block Grant - public services, Community Housing Development Organizations Operations HOME funds, County – funds for upfront design/development tasks, Low-income tax credits and prevailing wage rates for future in-kind services such as Mental health services and other related homeless services will be provided by the City’s Community Development Department.

HOME-ARP PRODUCTION HOUSING GOALS

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

The City will support the production of 65 to 70 permanent affordable units.

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

The City's Consolidated Plan highlights priority needs, including two goals that this plan will help support. This includes:

- Provide decent affordable housing; and
- Support special needs programs and services.

This project will put a dent into its affordable housing gap and will provide decent housing for homeless veterans from an experienced developer in an integrated development. Additionally, the units will be surrounding with special needs programs and services, such as Mental Health Services and related Homeless Services provided by the City's Community Development Department.

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:

This project will give preference for affordable housing units to homeless veterans and to individuals making 30 to 80% of area median incomes.

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

Consistent with the Needs Assessment and Gap Analysis, this will help fill the gap of 1,810 affordable rental units. Additionally, it will help provide options and support for 110 unsheltered veterans, and 574 veterans that are in transitional housing or Permanent Supportive Housing.

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

The Plan is also supporting mental health and homeless services that will be located within the housing development. Social services and available affordable units will be open to all qualifying populations to help fill gaps and unmet needs. The property management operations shall work in tandem with the Continuum of Care and the Coordinated Entry System to with regards to tenant selection.

HOME-ARP REFINANCING GUIDELINES

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

Not Applicable.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

Not Applicable.

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***

Not Applicable.

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

Not Applicable.

- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***

Not Applicable.

- ***Other requirements in the PJ's guidelines, if applicable:***

Not Applicable.