

HOME-AMERICAN RESCUE PLAN DRAFT ALLOCATION PLAN

Office of Housing

CITY OF ALEXANDRIA

421 King Street, Suite 215, Alexandria, VA, 22314

alexandriava.gov/Housing

Participating Jurisdiction: City of Alexandria **Date:** 3/21/22

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:

Information about the HOME-ARP program was presented at regular meetings of the Alexandria Housing Affordability Advisory Committee and the Partnership to Prevent and End Homelessness (the Partnership), the Continuum of Care for the City of Alexandria. These two bodies contain members and representatives of multiple organizations who were required to be consulted, such as the local housing authority and homeless service providers. Information was also presented at a joint meeting of the Office of Housing and the Office of Community Services (OCS)¹.

Following these meetings, the Office of Housing was contacted by Carpenter's Shelter, Friends of Guest House, and Volunteers of America seeking more information on the HOME-ARP program and if the funding could be used for their services. The Office of Housing also contacted the Partnership to verify the statistics on homelessness in Alexandria were correct based on the latest Point-in-Time count.

¹ A division of the Department of Community and Human Services (DCHS)

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

Agency Name	Agency Type	Method of Consultation	Feedback
Partnership to Prevent and End Homelessness	Continuum of Care	Meeting; email	Emailed verifying the number of available shelter beds and unhoused households
Carpenter's Shelter	Homeless shelter and service provider	Meeting; email	Representatives contacted the Office of Housing about funding transitional and permanent supportive housing programs
Alexandria Redevelopment and Housing Authority	Public Housing Authority	Meeting	None provided
Friends of Guest House	Re-entry services and transitional housing	Meeting; email	Representatives contacted the Office of Housing about funding transitional housing and supportive services programs
Volunteers of America/Alexandria Community Shelter	Homeless shelter	Meeting; phone call	Representatives contacted the Office of Housing about the program activity selection process
Department of Community and Human Services/Office of Community Services	Service provider	Meeting	

Public Participation

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

- ***Public comment period:*** start date – 3/21/22 end date – 4/22/22
- ***Public hearing:*** 4/23/22

The Draft Allocation Plan was released for public comment on March 21, 2022. Notice of the public comment period and date of the public hearing was provided in English- and Spanish-language newspapers of general circulation, as well as via the City's eNews mailing list, the Office of Housing's social media accounts, and the Office of Housing webpage.

The Draft Allocation Plan was available online at the Office of Housing's webpage and in hard copy at every City library and the Office of Housing. Translations and accessible versions of the document were available upon request. Copies were emailed to all the groups consulted as well as other community groups and requests were made for organizations to share the plan with their members and residents. Comments were accepted via email and postal mail, as well as in-person at the public hearing.

Describe any efforts to broaden public participation:

Comment period in progress.

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

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

Comment period in progress.

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

Comment period in progress.

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.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	68	#	77	#	0								
Transitional Housing	32	#	14	#	2								
Permanent Supportive Housing	8	#	39	#	2								
Other Permanent						#	#	#	#				
Sheltered Homeless						86	110	2	#				
Unsheltered Homeless						0	11	1	#				
Current Gap										0	#	1	#

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

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	39085		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2925		
Rental Units Affordable to HH at 50% AMI (Other Populations)	4975		
0%-30% AMI Renter HH w/ 1 or more severe housing problems		5365	
30%-50% AMI Renter HH w/ 1 or more severe housing problems		3205	
Current Gaps			(-2440) (1770)

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:

Compared to other jurisdictions, Alexandria has a very small unhoused population. The 2021 Winter Point-in-Time count recorded only 117 homeless households. 93% of households without children were sheltered, as were 100% of households with children. The Partnership to Prevent and End Homelessness estimates there are only 11 chronically homeless persons in Alexandria. Demographically, a majority of Alexandria's unhoused population is non-Hispanic Black or African-American, with non-Hispanics whites making up most of the balance.

Alexandria also has a very small population of individuals fleeing domestic violence. The Alexandria Domestic Violence Safe House served 75 individuals between July 1, 2020 and June 30, 2021. They included 42 women, 1 man, and 32 children. For safety reasons, other demographic information about these individuals was not provided. It is also unknown how many individuals fleeing domestic or dating violence, sexual assault, stalking, or human trafficking chose not to enter the Safe House and were housed elsewhere.

More than 60% of renter households below 30% AMI are severely cost burdened as are 30% of renters between 30-50% AMI. In all, there are about 6,800 severely cost-burdened households in Alexandria, two-thirds of which are below 30% AMI.

On a population level, Hispanic households with incomes below 50% AMI are most likely to experience housing problems of any kind. In practice, these housing problems are cost burden and overcrowding as there are almost no housing units in Alexandria lacking in bathroom or kitchen facilities.

Hispanic and Black or African-American households are also disproportionately effected by severe cost burdens.

The City does not track the number of households who meet the HOME-ARP definition of "at-risk of homelessness" or "other populations," but through partnerships with Legal Services of Northern Virginia and the Alexandria Eviction Prevention Partnership it is able to identify households at imminent risk of eviction and intervene if possible. Nearly all of these households would qualify as members of the "other populations" category.

In response to trends magnified by the pandemic, the City is expanding its list of characteristics of housing instability. Previously, it was limited to overcrowded households, households who had experienced homelessness in the past, and households with special needs such as mental illness, HIV/AIDS, or substance abuse. The expanded definition includes households whose incomes are less than 50% AMI and were eligible for rent relief programs sponsored by the City of Alexandria or the Commonwealth of Virginia; households who received housing relocation assistance or utilized an eviction storage program; households with undocumented members; and low-English proficiency households. Members of the first group are usually employed in low-wage jobs susceptible to market shocks like the pandemic and are also vulnerable to large

increases in rent or non-renewal of leases. The second group is made up of households who relocated involuntarily or were evicted and had to find new housing. The latter two types of households tend to have precarious employment and frequently self-evict before eviction prevention counselors can assist them. Because of the precarity of all these household types, they are included in the expanded definition of characteristics of housing instability.

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:***

Alexandria's homeless population is small enough that the current number of shelter beds and short-term transitional housing units is adequate to shelter every person who wishes to be sheltered, but there is a lack of available long-term transitional housing, permanent supportive housing, and housing affordable to the lowest income groups. This makes it difficult for unhoused individuals and households to move from temporary shelter to permanent housing. Most shelters are congregate shelters, though non-congregate shelter was provided for those who needed to isolate or quarantine because of COVID-19 exposure or infection. Tenant-based rental assistance is extremely difficult to obtain because of the limited number of vouchers available from the local housing authority and a waitlist that numbers in the thousands. Supportive services are provided to those who want them, but without adequate amounts of affordable housing, the services become long-term supports, not short-term measures to support those who have obtained stable housing.

Because of extremely small number of persons fleeing domestic or dating violence, sexual assault, stalking, or human trafficking in Alexandria and the limited demographic data about them, it is difficult to assess their unmet housing and service needs. The City's Domestic Violence Safe House provides non-congregate shelter at an undisclosed location. Services are available to those in the Safe House, but as with other populations, tenant-based rental assistance is extremely difficult to obtain because of the limited number of available vouchers.

While the Alexandria Department of Community and Human Services (DCHS) uses a wrap-around approach to provide services and assistance to families who are on the cusp of or exiting homelessness, the lack of housing affordable to the lowest income groups is a problem that cannot be overcome solely through service delivery. Only a limited amount of tenant-based rental assistance is available through the Alexandria Redevelopment and Housing Authority's (ARHA) Housing Choice Voucher program and obtaining housing in a development with project-based vouchers is equally difficult.

Housing instability is a greater problem in Alexandria than homelessness. This is best illustrated by the number of eviction filings, judgments, and default judgments in the year before the pandemic shutdowns began. From February 2019 to February 2020, there were an average 366

of eviction filings a month, with a median of 337 filings. Over the same time period, there were an average of 134 judgments a month and a median of 131. Of these judgments, there were an average of 93 default judgments a month, with a median of 84 judgments. These numbers declined precipitously during the court closures and eviction moratoria and remain lower than pre-pandemic because of state and local eviction prevention efforts. These efforts cannot prevent landlords from choosing not to renew a household's lease or increase rents, however, which can push households out of their housing even if they are up to date on their rent.

Crowding is another sign of housing instability in Alexandria. One of the populations hardest hit by the pandemic was the Hispanic community in the Arlandria neighborhood of the city. Many households in Arlandria live in overcrowded conditions because they cannot afford rents for appropriately sized units. Sick individuals could not always isolate themselves and therefore spread COVID-19 to their entire household.

One of the reasons for crowding is the high cost of rent in the city. According to the 2019 ACS, the median gross rent in Alexandria is \$1,747, which would require a household income of \$69,880 to afford. Based on the 2019 HUD income limits for affordable units, this is 57% AMI for a four-person household. 2013-2017 CHAS data estimates there are 12,100 renter households with AMIs below 50% but only 4,975 units affordable at 50% AMI.

Supportive services exist for those who qualify as members of other populations, but they are not as coordinated as the services for other groups. Households have to locate and obtain the services on their own. As with all other populations, tenant-based vouchers are very difficult to obtain.

One of the qualifying populations who have trouble accessing services, however, are people exiting publicly funded institutions such as prisons or substance abuse treatment centers. The members of this population can find their access to housing and services is limited by any criminal histories they may have. This puts them especially at risk of homelessness.

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:

Alexandria has approximately 91 year-round shelter and transitional housing beds and 60 seasonal shelter beds for unhoused adults without children and 100 year-round shelter and transitional housing beds for homeless households with children. Most of these beds are in congregate settings, though some non-congregate facilities were established as temporary isolation and quarantine facilities for individuals who had been exposed to or had an active case of COVID-19.

Non-congregate shelter is available for persons fleeing domestic or dating violence, sexual assault, stalking, or human trafficking, as are supportive services.

DCHS and local organizations such as Carpenter's Shelter and ALIVE! provide supportive services to homeless households, households exiting homelessness, households at risk of homelessness, and other households who are referred to them or choose to self-refer. Households are given a needs assessment at intake and services are tailored for their needs. While rental assistance is not available, the City's Transitional Assistance Program provides security deposit and first month's rent to households exiting homelessness or at risk of homelessness.

Eviction prevention services in the city are coordinated by the Alexandria Eviction Prevention Partnership (AEPP). AEPP brings together staff from the Office of Housing, DCHS, Legal Services of Northern Virginia, the Alexandria Sheriff's Office, and a variety of non-profit and faith-based organizations to provide eviction prevention resources to tenants and assist them in finding other housing if needed.

A variety of services are offered by DCHS and other City of Alexandria departments to help those who are members of other populations, such as childcare with sliding-scale fees, fare free public transportation, and utility assistance. Non-profit organizations also provide many services to the community, like food distribution programs and low- or no-cost health care. A very limited number of non-profits provide services to those exiting publicly funded institutions.

Tenant-based rental assistance is only offered through tenant-based vouchers from the Alexandria Redevelopment and Housing Authority (ARHA). ARHA has an allocation of 1,935 vouchers but can fully fund only 1,760. Source-of-income is a protected class in Virginia, allowing voucher holders a range of choices when searching for a unit.

Two properties in the city have project-based vouchers through contracts administered directly by HUD. Claridge House provides 300 units restricted to seniors. The Heritage at Old Town has a HAP contract for 140 units. A limited number of units with project-based rental assistance is available at projects that have received City funding.

There are about 5,000 committed affordable rental units in the city, including 1,150 public housing units. However, many of these units are affordable at the 60% AMI level, out of reach of many members of qualifying populations. Even including buildings with rent ranges of 40-60% AMI, there are only 519 unrestricted units affordable² to those with incomes of 0-40% AMI.

Permanent supportive housing is even more rare, with only 45 beds available for homeless individuals. There are approximately 150 permanent supportive housing beds in the city, but most are targeted to persons with mentally ill or those with intellectual or developmental disabilities.

² Outside of public housing, most housing targeting the lowest income groups is either age-restricted, permanent supportive housing for the disabled, or transitional housing

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

The main gap in Alexandria's shelter and housing inventory is a lack of housing affordable to the lowest income groups. While tenant-based vouchers or committed affordable housing targeted on extremely low-income households provide some help, both of those resources are in short supply and inadequate to meet the demand.

Alexandria has sufficient shelter beds for its unhoused population³ but lacks in affordable units for those making the transition from shelters to permanent housing (which is also in limited supply). This makes it difficult to place households in housing in Alexandria without outside support. The number of permanent supportive units is also far below the demand. For every opening in a support housing program there are five to ten applicants.

While Alexandria is working to preserve and increase its stock of affordable housing, the number of committed affordable units in the city is far below the demand. The number of market-affordable units available in the city has dropped dramatically in the last twenty years, driving up demand for affordable units and forcing many low-income households to either relocate outside the city, live in overcrowded conditions to afford the rent, or become rent-burdened.

More than 60% of renter households below 30% AMI are severely cost burdened as are 30% of renters between 30-50% AMI. In all, there are about 6,800 severely cost-burdened households in Alexandria. In comparison, there are approximately 3,800 committed affordable units in the city. Many of these units have long waitlists of households in need of affordable housing.

In addition to cost burden, crowding is a problem for lower-income households. Often multiple families will share one unit or large families will occupy units with insufficient space for the household.

Tenant-based rental assistance is only available through the Housing Choice Voucher program. The supply of vouchers is limited and ARHA's current waitlist has 31,000 households on it⁴.

Alexandria has a fairly well-coordinated service delivery system for homeless households, households at-risk of homelessness, and those fleeing domestic violence. Households in need of assistance will be referred to the Department of Community and Human Services for comprehensive assessments of their needs and provided with resources tailored for their needs. Households can self-refer or referrals can come through shelters, schools, churches, and other social service providers. Households in other populations can still obtain services, but it is more difficult because wrap-around services are not provided for them.

³ Based on the average number of unhoused persons per night as reported by the Partnership to Prevent and End Homelessness

⁴ This is the length of the combined public housing and Housing Choice Voucher waitlist.

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:

Any household below 50% AMI which was eligible for Alexandria’s COVID-19 Emergency Rental Assistance Program (ERAP) or Virginia’s Rent Relief Program (RRP) (whether they successfully applied or not) will be included in the other populations which qualify for HOME-ARP assisted units. These households are at high risk of housing instability because they have limited assets, are typically cost-burdened, and generally live paycheck-to-paycheck. Even a temporary loss of income can result in eviction or other loss of housing. Households who have received assistance from a relocation coordinator or eviction storage program will also be eligible as they have recently experienced housing instability and may have difficulty securing future housing. Households with at least one undocumented member or having low-English proficiency will also be considered at increased risk of homelessness because of their difficulties obtaining employment and housing.

Identify priority needs for qualifying populations:

The priority need for all qualifying populations is housing affordable to those with incomes of less than 40% AMI.

The next greatest need for all qualifying populations is tenant-based rental assistance as it allows those in the lowest income groups afford market-rate housing.

For homeless households, the third greatest need is non-congregate shelter as part of a “Housing First” model of homelessness reduction. For all other qualifying populations, supportive services are the greatest need.

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:

Data from the 2013-2017 Comprehensive Housing Affordability Strategy (CHAS), the 2015-2019 American Community Survey (ACS), and the City’s own records show a large demand for housing affordable at the lowest income levels and a small supply available. This gap cuts across qualifying populations.

A need for tenant-based rental assistance also cuts across qualifying populations. The limited supply of vouchers available and the length of the waiting list illustrate this need.

The City has an adequate amount temporary congregate shelter for its current population of unhoused people (based on the 2021 Point-in-Time count) but lacks in the amount of affordable appropriate permanent shelter for them, leaving them in limbo. An increase in the

amount of non-congregate shelter available would be beneficial in that it would provide another rung in the ladder to permanent shelter.

While service delivery for some members of other populations is imperfect, most households in qualifying populations can access coordinated service delivery systems. However, these services are in constant demand, straining resources. Bolstering those resources would allow for more assistance to be given.

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:

As part of its consultation process with groups, agencies, and organizations serving qualifying populations, the City solicited program ideas and worked with groups who asked for HOME-ARP support to refine these ideas and determine if they could benefit from HOME-ARP funding in both the short and long-term.

The City is aware there are currently multiple affordable housing projects underway or being planned in Alexandria, but most of them have only a small number of units designed as deeply affordable. However, there is one project where one-quarter of the units will be affordable at 40% AMI. As such a deep level of affordability can only be supported through subsidies, the City has selected this project for HOME-ARP funding in order to achieve its stated goal of providing more units for the lowest-income levels.

The City also consulted with providers of supportive services, including those who focus on persons exiting publicly funded institutions. While some providers focused on providing permanent supportive housing, others used a service delivery system with a focus on providing services, including housing, on a time-limited basis while their clients gained self-sufficiency and obtained permanent housing. In order to use HOME-ARP funds to benefit the greatest number of individuals, the City will work with providers who use the time-limited model.

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:

No funds were provided to a contractor or subrecipient.

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	\$ 224,322		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ 1,906,734		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 112,161	# %	15%
Total HOME ARP Allocation	\$ 2,243,216		

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 main needs identified in the gap analysis that qualify as eligible activities are housing production, tenant-based rental assistance, and supportive services for certain subsets of qualifying populations. The City has chosen to prioritize housing production and supportive services, as these will be the most efficient use of HOME-ARP resources. The production of new units will provide housing for those in the lowest-income groups for a long period of time. Supportive services for those exiting publicly funded institutions will assist those who traditionally have a difficult time obtaining services and housing but will also be time-limited to allow for more households to be served. The desire to serve as many households as possible is why time-limited services were chosen over tenant-based rental assistance as a gap to be filled; a household's need for rental assistance might be indefinite, while services that are linked to a set time period or goal allow for turnover. Tenants who receive rental assistance might also need assistance that continues beyond the amount of time that can be funded, while time-limited services can be phased out as funds become depleted.

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:

120 units of housing at 40% AMI will be supported with HOME-ARP funds

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

Alexandria's Housing Master Plan set a goal of 2,000 units of affordable housing constructed or preserved between 2015-2025. These units will help Alexandria achieve that goal as well provide housing for low-income households and households at risk of housing instability. Alexandria is also part of the Metropolitan Washington Council of Governments regional housing initiative and has committed to providing 2,250 new units of housing by 2030, with 75% of those units affordable to low-income households. Increasing the number of affordable units is also included Alexandria's Consolidated Plan with "Equitable Access to Housing" as a Priority Need for the City.

Preferences

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

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

Preference for housing will be given to qualifying households living in overcrowded conditions, severely cost-burdened households under 50% AMI, and/or households under 50% AMI who were eligible for City or State emergency rental assistance.

Supportive service programs will have a preference for individuals exiting publicly funded institutions of care.

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

The categories identified as preferenced for housing are all groups who were heavily affected by the pandemic, both by business closures and COVID-19 infections. The loss of income caused by business disruptions pushed many of these households into a state of housing instability and a risk of homelessness because of it.

Individuals leaving publicly funded institutions are often excluded from service delivery systems and housing assistance programs. As HOME-ARP is one of the few programs to explicitly include this population in its list of eligible populations establishing a preference will fill a gap in existing assistance programs.

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:

By creating more housing, especially deeply affordable housing, the units that had been occupied by the groups receiving preference will become available for occupancy by members of other qualifying populations. HOME-ARP funds are also an important part of the capital stack for the new housing that is planned. The funds will be leveraged to create other affordable units which will not have HOME-ARP restrictions, but which will be available to all members of qualifying populations.

Funding for supportive services for persons exiting publicly funded institutions is usually provided through local grants and other forms of public support. By using HOME-ARP funding instead, this support can be used to fund other programs which benefit members of other qualifying populations.