



Substantial Amendment

To the Snohomish County Urban County Consortium

2021 Annual Action Plan

March 13, 2023

**Snohomish County Urban County Consortium
HOME-ARP Allocation Plan**

Table of Contents

I. Proposed Substantial Amendment.....	1
II. Consultation	1
III. Public Participation	9
IV. Needs Assessment and Gaps Analysis.....	15
V. HOME-ARP Activities	27
VI. Use of HOME-ARP Funding.....	28
VII. Preferences.....	29
VIII. Referral Methods.....	31
Attachment 1: Public Comments	
Attachment 2: HOME-ARP Survey Results	

I. Proposed Substantial Amendment

Snohomish County HOME-ARP Allocation Plan

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

II. 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:

In July of 2022 Snohomish County developed a survey to obtain community input on how to allocate HOME-ARP funding to best meet Snohomish County’s COVID-19 recovery needs. The Survey was sent to two listservs consisting of over 500 email contacts, including affordable housing developers and housing providers, private non-profits, local governments, public agencies, public service providers, partnerships to end homelessness, fair housing advocacy and training organizations, Housing Authorities, and other interested parties. The survey was sent out on July 18, 2022, and again on July 29, 2022, and closed on August 5, 2022. A total of 55 responses were received.

To obtain additional input, several agencies were contacted directly including two housing authorities, two non-profit fair housing advocacy and training organizations, a civil rights agency, and one non-profit agency. Input was obtained through email and virtual Zoom meetings.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
North Counties' Family Services	Non-Profit Service Provider	Survey	While outreach services are important, my ranking demonstrates that many of the populations already know where to go and with whom they should contact -- thus, a low ranking. Ranked even lower is the 'credit repair,' i.e., once a person gains "life skills," achieves greater income, etc., the credit repair should 'follow.' And, thus, highest rankings are those which allow individuals/families the opportunities to succeed, to become self-sufficient and eventually give back. When we continue to do 'housing first,' without life skills, money management, childcare, education, mental health services -- the issues are only compounded -- never giving a family/individual the opportunity to become healthy -- too often, with the best of intentions, we only exacerbate difficult situations.
Refugee & Immigrant Services Northwest (RISNW)	Non-profit Services Provider	Survey	We provide services for new arrive refugees from Afghan, Ukraine, and Congo Republic. The urgent is housing and job. We provided rental assistance for 40 Afghan families and 68 Ukraine families. We have wait list of 200 Ukraine families are waiting for help. Thanks
Housing Hope	Non-profit Services Provider /Affordable Housing Developer	Survey	We need more supply of housing for homeless and low income families. County, cities, school districts and other governmental agencies need to partner with housing organizations and provide their surplus land at little or no cost.
Faith Food Bank and Community	Non-profit Services Provider	Survey	There is lots of City owned property shelters could go on. There are many

Meal, and Everett Hot Meals Coalition			churches that would help but regulations are making it too difficult.
Department of Social and Health Services (DSHS)	Public Agency	Survey	The shelters are always full, and many individuals complain of the drug use inside of them.
Domestic Violence Services of Snohomish County	Non-profit Services Provider	Survey	The question on involvement with the population was difficult to give one answer to. We provide shelter but just importantly housing (Permanent, Rapid rehousing and Transitional).
Catholic Community Services	Non-profit Services Provider	Survey	Thank you
Town of Woodway	Local Government	Survey	Ranking is arbitrary for me for the last question. I really don't know which is most preventive. On the whole, I would add that Production and Preservation of Affordable Housing is apparently not going to happen without regulatory changes in zoning and permitting and perhaps other areas I'm unfamiliar with. Though this is most likely a state issue, it would undoubtedly help to have the County weigh in on these issues and help to craft a solution. I don't know if that is happening. I don't feel very positive about HART at this time.
Providence Regional Medical Center Everett (PRMCE)	Regional Hospital	Survey	Pursue permanent affordable housing through the 'Community Land Trust' (CLT) approach!
Everett Public Library	Public Agency	Survey	I've encountered hundreds. Thousands? of unsheltered individuals where I work. They are "stuck" in survival mode, focused on staying alive for another day, trying to sleep for a few hours at a time. They are sleep deprived. My vision is every unsheltered individual will have a safe place where they can finally let down their guard and get good quality sleep. Not just for one night. Indefinitely. They need to rest. Eat healthy food. Be able to keep themselves and their clothes clean. Shelter. Food. Clothing. If

			<p>people can count on having those basic survival-level things, they may be able to move on to managing mental health, and/or addiction and recovery. Many of the unsheltered I meet are senior citizens, veterans, or disabled. The focus of service providers seems to be trying to get them jobs; when some should be retired, or in assisted living. Getting a job isn't the answer for everyone. Unsheltered children and families are another area of concern: parents and kids living in their car. There should be a no-wait emergency housing system for juveniles and their parent(s), one that also allows existing family pets to stay with them. It's bad enough for a child to lose their home, making them give up their beloved comfort animal in a time of stress just seems petty. For a child, the trauma of being unsheltered is irreversible; it impacts their brain development which affects their performance in school, and in life. And the cycle of trauma continues for another generation. I'm so glad our community has this grant. I know \$7M doesn't go very far when it comes to housing and real estate. Any additional housing will be helpful.</p>
Ideal Option	Addiction Treatment Services	Survey	It is very difficult to rate these as they are all interdependent for true long-term success.
Society of St Vincent de Paul of Snohomish County Monroe Community Resource Center	Non-profit Services Provider	Survey	It has been a pleasure working with you all!
Alliance for Housing Affordability		Survey	In brief: More units of minimal restriction (for certain populations), as fast as possible. Supportive services have to be there quickly but mean less if there is no housing unit for the recipient of those services to go back to. Also, units at the top (50% - 60% AMI) are preventative, reducing the number of households that fall into homelessness and the need for services - an

			<p>ounce of prevention is worth a pound of cure.</p> <p>Thank you for inviting me to take this survey.</p> <p>Chris</p>
YWCA Snohomish County	Non-profit Services Provider	Survey	<p>I'm biased, clearly, because I am a rapid rehousing case manager. But I truly believe that rapid rehousing is one of the best tools we have to end homelessness for the majority of the homeless population. Are there people who's needs can't be met by rapid rehousing? Of course. But overall, there should be at least 3x the number of rapid rehousing programs than we currently have. That will cut down on your homeless population very very quickly. HOWEVER, as a case manager I'm also aware that we are in desperate need for MORE affordable housing. There isn't enough housing for everyone right now and that's a huge problem, so we need more housing too. If possible, both goals seem equally important to me and if you could do both, I would do that. But if I had to choose between building more affordable housing and creating more rapid rehousing programs, I would absolutely choose more RRH programs. If you build another low income housing property, that will house *maybe* 60 people depending on the size? with robust and continuing rapid rehousing programs, we can house many more people in a much shorter amount of time.</p>
Bridgeways	Public Service provider assisting with supportive employment and housing services for persons living with mental illness.	Survey	<p>If you review how CBRA dollars have been spent for FY 21-22, there is a dire need for transitional and temporary housing. Those that are involved with Homeless Outreach can attest that individuals cannot be picked up off the streets and moved directly into permanent, stable housing. They need access to transitional and/or temporary housing as an in-between.</p>
United Way of Snohomish County	Non-profit Agency	Survey	<p>I would like to see the county leverage this funding towards creating a more diverse housing stock - can these funds propel the</p>

			building of not just affordable housing, but many different types of housing for people in various life stages and from different cultural backgrounds? (e.g., missing middle housing - https://missingmiddlehousing.com).
Community Resource Center	Non-profit Services Provider	Survey	Huge need for REAL affordable housing.
City of Monroe	Local Government	Survey	Although I ranked short- and medium-term rental assistance and acquisition and development of non-congregate shelter as my top two choices, I encourage development of the full range of housing options. We need to stabilize people in existing housing so they do not become homeless. We also need to move people from temporary housing into permanent housing. This will require building new affordable housing.
Lifelong	Non-profit Services Provider	Survey	Acquisition for rehabilitation and/or development should consider the length of time these projects can sometimes take. Housing needs are urgent and taking on a project that could take years as opposed to months can really make a difference.
Everett Housing Authority	Public Housing Authority	01/30/2023 - Email	<p>The Everett Housing Authority (EHA) leadership found the ranking exercise to be challenging given the great need for all of these activities. However, EHA ranked creation/preservation of affordable housing at the top.</p> <p>The relatively long time frame before the funds need to be expended (2030) seems to provide adequate time for Snohomish County to invest these funds in creation and preservation of housing units, which is often a lengthier process than investing in short-term housing or services, but provides a more permanent solution to the lack of affordable housing in our community.</p> <p>Investing HOME funds in creation or preservation of affordable housing also allows Snohomish County’s funding to</p>

			<p>leverage other capital and operating funding dollars.</p> <p>Rental assistance also plays a key role in addressing housing affordability challenges but requires an adequate supply of rental units for participants in which to use their rental assistance. Investing in creation and preservation of affordable housing will likely strengthen the success of tenant-based rental assistance programs.</p>
Housing Authority of Snohomish County (HASCO)	Housing Authority of Snohomish County	01/30/2023 - Email	HASCO did not have any comments to provide at this time.
Volunteers of America Western Washington	Non-profit Services Provider and fair housing	01/30/2023 - Email	<p>All listed activities are necessary to address housing crisis and lessen the harmful affects of homelessness in our community. We have a critical shortage of shelters – this prevents our unhoused neighbors from meeting their very minimal human needs – a roof over their heads, ability to rest, recover, take care of their health, and start making progress towards permanent housing stability and self-sufficiency. This should be our biggest priority – providing immediate access to shelter.</p> <p>Homelessness Prevention is my second choice; timely rental assistance prevents evictions, and relocation to new housing when eviction is not preventable allows vulnerable households to maintain their housing stability, avoid the damages and expenses of homelessness, and offer individualized solutions to many critical situations.</p> <p>Resolving housing adversity is not possible without building and/or rehabilitating more affordable rental units. Investments in fighting homelessness can’t be effective if there is no affordable housing available to relocated to when rapid income decrease happens, or to move in after shelter or transitional housing.</p>

			<p>Last but not least, even it is not my highest priority, would be Supportive Services. I recognize the importance of these services, and hope this activity might be addressed with another funding source, or partially through HOME-ARP.</p>
<p>Fair Housing Center of Washington</p>	<p>Non-profit fair housing advocacy and training organization</p>	<p>Zoom Meeting 3/02/23 at 10:00 am</p>	<p>Barriers to housing include the lack of affordable housing units to meet the need, lack of accessible housing (only 1% of all housing is accessible), and the cost to get into housing (requiring first, last and security deposits) is too much for low- and moderate-income households to afford. Recommendations include building more accessible housing units near transportation and services, provide funding for existing programs, increase vouchers for persons experiencing homelessness, especially for youth 18 – 22, LGTBQ and BIPOC individuals and families.</p> <p>Need more fair housing training; of all filed complaints, more than 50% are related to accessibility. There are no funds to do modifications and there is a lack of understanding regarding service animals and housing discrimination. 2) Screening criteria regarding criminal history and citizenship. workaround could include requiring housing providers at time of application for funding, provide their screening criteria. and 3) because of increased staff turnover, indications are that more housing staff need training on fair housing, including shelter and transitional housing staff.</p>
<p>Washington State Human Rights Commission</p>		<p>Left Message on 2/16/23 2/17/23</p>	<p>Received a call back and was referred to a compliance specialist who would contact me via email. No further contact was received.</p>
<p>Northwest Fair Housing Alliance</p>	<p>Non-profit fair housing advocacy and training organization</p>	<p>Zoom Meeting on 2/21/2023</p>	<p>Unmet needs and gaps have increased as a result of Covid-19 and other factors. We need more affordable housing located near transportation and services, low-</p>

			<p>barrier housing, and accessible housing. Rental assistance is helpful, increase vouchers especially for homeless households, and support existing programs. Support for youth 18 to 22 aging out of foster care and LGBTQ families. Barriers to housing include costs - Getting into housing is expensive and folks cannot afford the upfront costs (requiring three-months' rent upfront, application fees), and source of income discrimination. Digital applications for housing, especially for persons with disabilities and elderly persons, are hard to access and understand. Having funding available for upfront costs is critical. Due to turnover in housing staff, fair housing training is needed.</p>
--	--	--	---

Summarize feedback received and results of upfront consultation with these entities:

The survey results in ranked order include:

1. Production & preservation of affordable rental housing,
2. Acquisition and development of non-congregate shelter(s),
3. Supportive services, and
4. Short or medium-term tenant rental assistance.

Additional comments received from survey responders included:

- Need for full range of housing options,
- Create a diverse housing stock,
- Need regulatory changes in zoning & permitting,
- Donation of public land for affordable housing,
- low-barrier temporary housing options,
- Housing needed for individuals with different cultural backgrounds, and
- Urgent need for housing and employment for refugees from Afghanistan, Ukraine, and Congo Republic.

The results of the survey are summarized in a two-page flyer located in Attachment 2: HOME-ARP Survey Results

III. 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.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Template:

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: 2/8/2023*
- *Public comment period: start date – 2/22/2023 end date – 3/8/2023*
- *Date(s) of public hearing: 2/23/2023*

Describe the public participation process:

Snohomish County followed its approved Citizen Participation Plan (CPP) for the Snohomish County Consortium in development of the HOME-ARP Allocation Plan.

The CPP encourages participation by all residents of the county, including low- and moderate-income persons, persons with special needs such as elderly persons and persons with disabilities, and persons of racial and ethnic minorities. The CPP provides for consultation with the public housing authorities and its residents. In addition, the CPP provides residents with a reasonable opportunity to comment on proposed plans, any proposed substantial amendments to the plans, and the annual performance and evaluation reports.

Outreach was conducted for the HOME-ARP Allocation Plan beginning with a public notice, translated into Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean, and Chinese (simplified). The public notice, announcing the public hearing and public comment period, was published in the Everett Herald, and included information and directions on how to attend the virtual public hearing, how to submit written and verbal public comments, and how to request reasonable accommodations and language interpreters. The public notice, including the translated copies, was emailed to over 500 contacts and

posted on the County webpage. A press release, which included the same information as the public notice, was published by the Executive Office.

The public comment period was open from February 22, 2023, through March 8, 2023.

Outreach Efforts									
1	Mode of Outreach: Survey								
	<table border="1"> <tr> <td>Target of Outreach</td> <td>Non-targeted/broad community Non-profit service providers, other public agencies (local government, state, etc.), community resources centers, fair housing, civil rights, disability organizations, interested community members, partnership to end homelessness, behavioral health organizations, and affordable housing developers.</td> </tr> <tr> <td>Summary of response/attendance</td> <td>A total of 55 responses were received.</td> </tr> <tr> <td>Summary of comments received</td> <td>The survey results in ranked order include: 1. Production & preservation of affordable rental housing, 2. Acquisition and development of non-congregate shelter(s), 3. Supportive services, and 4. Short or medium-term tenant rental assistance.</td> </tr> <tr> <td>Summary of comments not accepted and reasons</td> <td>All comments received were considered in development of the HOME-ARP Allocation Plan.</td> </tr> </table>	Target of Outreach	Non-targeted/broad community Non-profit service providers, other public agencies (local government, state, etc.), community resources centers, fair housing, civil rights, disability organizations, interested community members, partnership to end homelessness, behavioral health organizations, and affordable housing developers.	Summary of response/attendance	A total of 55 responses were received.	Summary of comments received	The survey results in ranked order include: 1. Production & preservation of affordable rental housing, 2. Acquisition and development of non-congregate shelter(s), 3. Supportive services, and 4. Short or medium-term tenant rental assistance.	Summary of comments not accepted and reasons	All comments received were considered in development of the HOME-ARP Allocation Plan.
Target of Outreach	Non-targeted/broad community Non-profit service providers, other public agencies (local government, state, etc.), community resources centers, fair housing, civil rights, disability organizations, interested community members, partnership to end homelessness, behavioral health organizations, and affordable housing developers.								
Summary of response/attendance	A total of 55 responses were received.								
Summary of comments received	The survey results in ranked order include: 1. Production & preservation of affordable rental housing, 2. Acquisition and development of non-congregate shelter(s), 3. Supportive services, and 4. Short or medium-term tenant rental assistance.								
Summary of comments not accepted and reasons	All comments received were considered in development of the HOME-ARP Allocation Plan.								
2	Mode of Outreach: Internet Outreach								
	<table border="1"> <tr> <td>Target of Outreach</td> <td>Minorities Non-English Speaking - Specify other language: Russian, Spanish, Korean, Vietnamese, Persons with disabilities non-targeted/broad community Residents of Public and Assisted Housing Organizations, Public Agencies, and Local Governments</td> </tr> <tr> <td>Summary of response/attendance</td> <td>Internet outreach announcing the public hearings was conducted by sending notices and flyers (Flyers were translated into Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean, and Chinese (simplified)), announcing the public hearing to the affordable housing and community development email distribution lists of interested organizations, agencies, local governments, and other interested persons maintained by the Snohomish County Human Services Department - Housing and Community Services.</td> </tr> <tr> <td>Summary of comments received</td> <td>No comments received</td> </tr> <tr> <td>Summary of comments not accepted and reasons</td> <td>NA</td> </tr> </table>	Target of Outreach	Minorities Non-English Speaking - Specify other language: Russian, Spanish, Korean, Vietnamese, Persons with disabilities non-targeted/broad community Residents of Public and Assisted Housing Organizations, Public Agencies, and Local Governments	Summary of response/attendance	Internet outreach announcing the public hearings was conducted by sending notices and flyers (Flyers were translated into Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean, and Chinese (simplified)), announcing the public hearing to the affordable housing and community development email distribution lists of interested organizations, agencies, local governments, and other interested persons maintained by the Snohomish County Human Services Department - Housing and Community Services.	Summary of comments received	No comments received	Summary of comments not accepted and reasons	NA
Target of Outreach	Minorities Non-English Speaking - Specify other language: Russian, Spanish, Korean, Vietnamese, Persons with disabilities non-targeted/broad community Residents of Public and Assisted Housing Organizations, Public Agencies, and Local Governments								
Summary of response/attendance	Internet outreach announcing the public hearings was conducted by sending notices and flyers (Flyers were translated into Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean, and Chinese (simplified)), announcing the public hearing to the affordable housing and community development email distribution lists of interested organizations, agencies, local governments, and other interested persons maintained by the Snohomish County Human Services Department - Housing and Community Services.								
Summary of comments received	No comments received								
Summary of comments not accepted and reasons	NA								
3	Mode of Outreach: Public Hearing								

	Target of Outreach	Minorities Non-English Speaking - Specify other language: Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean, and Chinese (simplified), Persons with disabilities non-targeted/broad community Residents of Public and Assisted Housing Organizations, Public Agencies, and Local Governments
	Summary of response/attendance	A public hearing was conducted on February 23, 2023. A total of 14 people attended, three staff persons and 11 community members. Participants were able to ask questions and provide verbal or written public comments. Reasonable accommodations and language interpreters were available upon request.
	Summary of comments received	Comments received recommended using some of the HOME-ARP funds to purchase property that is currently used as a Hygiene Center serving unhoused people in the South Snohomish County, and to also renovate it into a Day Service Center for the unhoused, after purchase. The full comments can be found in Attachment 1.
	Summary of comments not accepted and reasons	The project was not an eligible use of HOME-ARP funds.
4	Mode of Outreach: News Paper Ad	
	Target of Outreach	Minorities Non-English Speaking - Specify other language: Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean, and Chinese (simplified), Persons with disabilities non-targeted/broad community Residents of Public and Assisted Housing Organizations, Public Agencies, and Local Governments
	Summary of response/attendance	Newspaper ad for the public hearing held on February 23, 2023, and the 15-day comment period, was placed in the Herald, which is the newspaper of general circulation in Snohomish County.
	Summary of comments received	See comments under Public Hearing
	Summary of comments not accepted and reasons	All comments received were considered in development of the HOME-ARP Allocation Plan.

5	Mode of Outreach: 15-day Public Review and Comment	
	Target of Outreach	Minorities Non-English Speaking - Specify other language: Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean, and Chinese (simplified), Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing Organizations, Public Agencies, and Local Governments.
	Summary of response/attendance	Outreach announcing the public review and comment period was conducted by publication of the public notice in the Everett Herald Newspaper and by sending the public notice (translated into Spanish, Russian, Vietnamese, Arabic, Marshallese, Korean, and Chinese (simplified)), announcing the public comment period to the affordable housing and community development email distribution lists of interested organizations, agencies, local governments, and other interested persons maintained by the Snohomish County Human Services Department - Housing and Community Services. In addition, a press release was issued and the public notice and translated copies were posted to the County webpage.
	Summary of comments received	No comments received
	Summary of comments not accepted and reasons	NA

Describe efforts to broaden public participation:

Executive Somers established the Office of Recovery & Resilience (ORR) to guide the County’s recovery work by ensuring federal pandemic relief is administered quickly, effectively, and equitably. In February 2022, ORR launched a countywide community engagement effort to guide investment strategies for the County’s remaining ARPA funding. The goal was to get a clear set of pandemic recovery priorities from the community to directly inform all programs and spending decisions. As a result of the hundreds of conversations and engagements undertaken over the four months of engagement, ORR has identified the following overall community pandemic recovery priorities:

- Behavior & Mental Health Services,
- Growth & Affordability,
- Shelter and Homelessness,
- Child Care & Early Childhood Education,
- Workforce Development, and
- Focus on Youth.

Information on the County’s recovery work can be found at: www.snohomishcountywa.gov/recovery.

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

Two comments were received at the public hearing and both comments recommended using a portion of the HOME-ARP funding to acquire property where a Hygiene Center is currently located in the City of Lynnwood. The purchase of the property would guarantee that the Hygiene Center continues to serve unhoused people in the South County area, and to renovate it into a Day Service Center for the unhoused, after purchase.

Through the survey and consultation process, there were several recommendations to use HOME-ARP funding for the creation or preservation of affordable rental housing units.

Enter narrative response here.

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

The recommendation at the public hearing to fund acquisition of a property for the Hygiene Center and renovation of the Day Services Center after purchase, was not an eligible HOME-ARP project.

While we agree the primary cause of homelessness and housing instability in this region is a lack of housing and in particular, a lack of housing affordable at lower income levels, there is a lack of shelter to short term housing options that may bridge people until long term housing becomes available. Non-congregate sheltering with enhanced services that creates a bridge to housing has become a high priority to meet some of the highest needs in our communities.

The shelter and housing inventory along with the gaps identified demonstrate a significant lack of shelter and housing. Non-congregate shelter rose as a priority to more quickly move individuals from unsheltered locations into enhanced shelters through the acquisition motels or other sheltering options. At least 2 motels acquired through other funds will serve as non-congregate shelters serving qualified populations. Other shelter and non-congregate sheltering options are being considered. HOME ARP funds will provide funding prioritized for enhanced services for Qualified Population 1 at new non-congregate shelters that bridge people moving into housing and/or other sheltering options. Development of new housing would take much longer and the needs are urgent requiring a solution for the shorter term, while we continue to work on housing options.

New non-congregate shelter units are anticipated to be operational starting in mid-to later 2023.

Enter narrative response here.

IV. Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of all four of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. 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.

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
Emergency Shelter	200		430		2							
Transitional Housing	0		14		0							
Permanent Supportive Housing	882		843		447							
Other Permanent Housing	510		118		0							
Sheltered Homeless						256	332	19	87			
Unsheltered Homeless						31	550	27	50			
<i>Current Gap</i>										87		438

(Data from PIT/HIC: 2/21/2022)

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory		Level of Need
	# of Units		# of Households
			Gap Analysis
			# of Households

Total Rental Units	96,685		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	24,055		
Rental Units Affordable to HH at 50% AMI (Other Populations)	20,375		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		15,005	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		4,935	
Current Gaps			19,940

Suggested Data Sources: 1. American Community Survey (ACS); 2. 2015-2019 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

PIT Count Data / Racial Demographics

Snohomish County’s Annual Homeless Point-in-Time (PIT) count, designed to provide a snapshot of households experiencing homelessness on a single night, was conducted on February 22, 2022. While PIT counts traditionally occur in January, this change from previous counts was the result of a COVID-19 related extension granted by the U.S. Department of Housing and Urban Development. This survey was supported by the efforts of 204 volunteers, county personnel, and partnering agency staff. The unsheltered PIT count was not conducted in 2021 due to the COVID-19 pandemic. The 2022 count identified 1,184 people in 953 households residing in shelter, transitional housing, or living without shelter in Snohomish County the night of February 21, 2022, the highest number since 2012.

The PIT count is required by state and federal funders and is used in program planning. It includes people residing in emergency shelter, transitional housing, and living without shelter. Because the unsheltered count relies on volunteer survey takers who visit encampments, food banks, community resource locations, and known areas where people who are unsheltered congregate, the previous methodology was prone to undercounting families experiencing homelessness. Snohomish County’s continued commitment to increase the usability and accuracy of the PIT count data led to a change in methodology for locating homeless households in 2019 and included a new strategy to locate households experiencing homelessness.

Despite increased efficiencies and investments across the system which continue to assist more households each year, the total PIT count—including individuals residing in shelter, transitional housing, and living without shelter—is the highest it has been since 2012. From its low point in 2015, when 829 people were identified, the PIT count increased 42.8% to 1,184 in 2022 and represents an increase of 52 individuals from 2020 when the last complete count was conducted. Within that overall count, the number of people living unsheltered decreased by 13.2% from 673 in 2020 to 584 in the 2022 count.

Conversely, the sheltered count (600) is a reflection of system capacity and is the highest it has been since 2013. This increase of 30.7% over the number in 2020 (459) is due to an increase in shelter capacity including cold weather shelters which were open the night of the count.

The count varied in important ways from previous years. The number of households with children experiencing homelessness (92) did not change from the last full count in 2020, but the number of households experiencing sheltered homelessness increased 52.4% (168 to 256) while unsheltered households with children decreased 73.3% (116 to 31). There was also a decrease in the number of households with children experiencing chronic homelessness from 2020 (37) to 2022 (29). Households with only children also decreased by 50% (30 to 15). The total number of households without children experiencing unsheltered homelessness changed very little from 2020 to 2022, but there was an increase in households without children experiencing chronic homelessness (448 to 499). This means that more than 50% of all households without children experiencing homelessness in Snohomish County are chronically homeless.

Of note, there was a decrease in the number of people whose race is Black, African American, or African from 11.2% in 2020 to 6.4% in 2022. In contrast, the number of people who are Hispanic/Latin(a)(o)(x) showed a slight increase from 10.6% to 11.23%.

The percentage of people having a gender of female or male remained relatively unchanged, but there was a slight increase in the number of people who are transgender, questioning, or who have a gender that is not singularly female or male (e.g., non-binary, genderfluid, agender, culturally specific gender) from .97% to 1.44%.

Additional PIT/ HIC Demographics:

	Sheltered*			Unsheltered		
	Family	Adults Only	Veterans**	Family	Adults Only	Veterans**
Number of Households	81	325	16	11	521	27
Number of Persons	256	332	19	31	550	27
Number of Persons Under age 18	152	0		15	0	
Number of Persons 18-24	8	12		1	50	
Number of Persons 25+	96	320		15	500	
Female	163	95	0	20	184	3
Male	91	231	19	11	361	23
Not singularly Female or Male***	1	1	0	0	3	0
Questioning	1	0	0	0	0	0
Transgender	0	5	0	0	2	1
Non-Hispanic/Latin(a)(o)(x)	205	308	18	29	497	27
Hispanic/Latin(a)(o)(x)	51	24	1	2	53	0

American Indian, Alaska Native, or Indigenous	1	11	0	1	33	2
Asian or Asian American	0	8	1	0	7	0
Black, African American, or African	1	28	2	0	44	2
Native Hawaiian or Pacific Islander	34	5	0	0	12	0
White	192	271	16	30	441	22
Multiple Races	28	9	0	0	13	1

Notes:

*Emergency Shelter and Transitional Housing

**Veterans: subpopulation of Families and Adults Only

***e.g., non-binary, genderfluid, agender, culturally specific gender

While an imperfect measure, the PIT count is one of the tools used to inform priorities for federal, state, and local funding. It also helps identify trends and craft solutions for the needs of vulnerable individuals and families.

At Risk of Homelessness as defined in 24 CFR 91.5

The most recent CHAS (Comprehensive Housing Affordability Strategy) data produced by HUD identified 15,005 currently housed households (renters) in Snohomish County at or below 30% AMI with one or more severe housing problems.

The Department of Housing and Urban Development (HUD) defines a household as being housing cost-burdened if it spends more than 30 percent of its income on housing, including utilities. Using this definition, 32.1% of Snohomish County households are housing cost-burdened with a substantially larger percentage of renters being cost-burdened (49.3%) than homeowners (28.6%).

While affordability challenges exist for all households of all races and ethnicities in Snohomish County, the challenges are greater for some residents than others given that the median income earned by Snohomish County residents varies by race and ethnicity as shown below.

Snohomish County Earners by Race/Ethnicity	Snohomish County Median Income
Asian	\$113,116
White (Non-Hispanic or Latinx)	\$104,367
American Indian/Alaskan Native	\$86,964
Multiracial	\$85,191
Native Hawaiian/Pacific Islander	\$80,226
Black or African American	\$78,140
Hispanic or Latinx	\$70,343

These income disparities across race and ethnicity make it harder for Snohomish County residents of color to afford housing. For example, the median family income for Hispanics/Latinx, Black or African Americans, and Native Hawaiian/Pacific Islanders cannot support a 2-bedroom rental in Snohomish County without the household being housing cost-burdened.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

2021 Crime in WA (CIW) Report produced by the Washington Uniform Crime Reporting (UCR) Program is a publication based on crime statistic data submitted from Washington law enforcement agencies using the National Incident-Based Reporting System. The CIW 2021 compilation for Snohomish County received a total of 2,993 domestic violence reports. Of those, the Snohomish County Sheriff's Office (SO) reported 1,000 dv reports. Domestic Violence Services of Snohomish County (DVS) reported their 24/7 call center received 4,685 calls from domestic violence (DV)/intimate partner violence (IPV) survivors and their families. Domestic violence is a leading cause of homelessness among women and children. The risk is especially great for women and children with limited economic resources. The Family and Youth Services Bureau found that "between 22 and 57% of homeless women report that domestic violence was the immediate cause of their homelessness."

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

The most recent CHAS (Comprehensive Housing Affordability Strategy) data produced by HUD identified 16,515 currently housed households (renters) in Snohomish County between 30%-50% AMI with one or more severe housing problems.

Veterans: The number of households with a veteran increased from 41 to 46 in the 2022 PIT Count.

Other individuals or families who were previously homeless or at greatest risk for housing instability due to very low incomes and housing cost burdened. The Snohomish County Low-Income Needs Assessment reports high priority services needs for household with children under age of six, including housing assistance, assistance applying for/keeping benefits, basic needs, budgeting/finance, childcare, and other services to support housing stability.

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 (Optional):

New non-congregate shelter units are anticipated to be operational starting in mid-to later 2023. Current inventory of permanent supportive housing, shelter units, TBRA, prevention rental assistance and services, and other affordable housing may be available over time to qualified populations as units turnover. However, the supply is insufficient to meet all housing stability needs. A range of services are available through mainstream systems and limited flex funds available to procure services on an individual need when mainstream systems are not available.

Describe the unmet housing and service needs of qualifying populations:

The primary cause of homelessness and housing instability in this region is a lack of housing and in particular, a lack of housing affordable at lower income levels. There is a lack of shelter to short term housing options that may bridge people until long term housing becomes available. Other factors impact an individual or family's ability to obtain and maintain housing that services may help address. While a range of mainstream and other services are available, these are either not sufficient to meet all needs or the individual or household needs assistance to access services. Services may have numerous requirements for documentation to demonstrate eligibility or persons may need assistance with transportation or other needs to access services. Limited navigation services may assist individuals and families to complete paperwork, secure transportation, find childcare, access employment or education services, access behavioral and health care, or other needed services. The Community Resource line and online searchable database is a resource that anyone may access, along with the Live Well database. These are all critical to supporting an individual or family's capacity toward greater housing stability.

Homeless as defined in 24 CFR 91.5

As reported in the most recent Point in Time Count, approximately 600 people experiencing homelessness with shelter, and 584 people experiencing homelessness without shelter in Snohomish County.

More nuanced data collected during the 2020 PIT Count sheds light on the intersectionality between affordable housing and behavioral health. Of the 673 individuals identified as unsheltered in the 2020 PIT Count, 46.4 percent reported a serious mental illness and 40.7 percent reported a substance use disorder. Trend data from PIT Counts clearly demonstrates that the complexity of needs of individuals experiencing homelessness in Snohomish County has been increasing. Persons experiencing long periods of homelessness in addition to having one or more disabling condition are defined as chronically homeless and the number of persons meeting that status has increased more than 3.5 times between 2015 and 2020 (160 compared to 583 respectively). Individuals in that category has steadily comprised a larger percentage of Snohomish County's homeless population over time. In 2015, chronically homeless persons accounted for 19.3 percent of the homeless population compared to 51.5 percent in 2020. For many of these individuals living with a mental or physical disability combined with a long history of trauma while homeless, the most effective response is the development and operation of long-term housing with intensive supportive services, known as permanent supportive housing. While there are nearly 2,000 beds of emergency and permanent supportive housing in Snohomish County, there are not enough to cover the need as shown by the 2022 PIT Count in which 583 chronic homeless persons were unhoused.

This is of particular concern since the behavioral health challenges so prevalent among chronically homeless individuals substantially impede the ability to maintain steady employment and pay housing costs on a regular basis. They also contribute to increased use of hospital emergency departments and arrests. According to the National Alliance on Mental Illness (NAMI) Washington, 6 percent "of those with a mental health condition are homeless or in jail."

Not only do the lack of integrated affordable housing and behavioral health services contribute to an increase in homelessness but an increase in homelessness exacerbates both these conditions in turn, resulting in an increased proportion of government investment being made toward addressing the

immediate emergency, leaving fewer resources for investment in long-term solutions.

It is largely believed that we will see an increased count of people living without shelter as a result of the COVID-19 pandemic, which has negatively impacted thousands of households in Snohomish County.

At Risk of Homelessness as defined in 24 CFR 91.5

What we have been experiencing for several years is the inability of the housing market to create housing units either in number or at a price that are affordable to most of the households in Snohomish County. Households at lower income levels are much more likely to be “cost-burdened.” Despite considerable attention being drawn to housing issues, affordability has significantly worsened in recent years. Growth in income has greatly lagged the growth in housing costs.

Renters are particularly impacted by the housing affordability challenge. Renters in our county tend to be of lower income than homeowners: 48.2% of renters (versus 29.5% of homeowners) made less than \$75,000 in household income in the last year. As a result, renters on average experience a higher incidence of being cost-burdened than homeowners. An estimated 95,045 Snohomish County households are renters—a third of all households in the County. In 2019, fair market rent for a two-bedroom apartment averaged \$1,899 per month in Snohomish County. To afford that and pay no more than 30% of their income on housing and utilities, a household would need to make \$36.52 an hour, or \$75,960 a year. This means that nearly half (48.2%) of all households in Snohomish County cannot afford an average two-bedroom apartment offered at fair market rent. Those making minimum wage (\$12/hr.) would need to work three full-time jobs to afford an average two-bedroom apartment in Snohomish County.

An analysis by the Housing Affordability Regional Task force in Snohomish County published in 2020 shows a dramatically greater need for housing at lower price points, and indicates that for no household to spend more than 30% of their income towards housing, Snohomish County would need 127,215 additional housing units by 2040—more than 6,300 new units each year. In comparison, in the previous three years, 7,938 housing units came online in Snohomish County, at a rate of about 2,650 per year. Housing would need to be built at slightly more than double the current rate to meet the projected housing affordability needs. These new housing units also need to be affordable to households across the income spectrum. The vast majority of cost-burdened households today have incomes at 80% of AMI and below. The HART report projected the need of 127,215 additional housing units is based on a rough straight-line calculation on then current conditions.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

The World Health Organization (WHO) warns that violence against women increases after every type of disaster or emergency. At the start of the pandemic, the National Domestic Violence Hotline began collecting data to track COVID-19’s impacts on those affected by relationship abuse. During the first two months of the pandemic, contacts to the hotline increased by 9 percent compared to the same period in 2019. Ninety percent of all individuals reported experiencing emotional or verbal abuse in which their abuser used threats, intimidation, and/or humiliation to gain power and control. Nearly one in four (24 percent) of all individuals reported that economic or financial abuse was present in their situation.

Locally, we estimate the number of survivors that need housing or services in our geographic area is the number currently serving in shelter and housing (379) plus the annual estimated number of those in need of housing or services that are not currently serving (222) based on a calculation utilizing monthly turn-away calls from the local Victim Service Provider.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Families with young children who are unstably housed, couch surfing and in situations where they are homeless or at-risk of homelessness, but not meeting the HUD definitions of homelessness or at-risk of homelessness. Families unstably housed in the County's Early Childhood Assistance Program mirror other families with young children in similar programs or with similar characteristics but not enrolled. Snohomish County Early Childhood Education Program Data:

Fully enrolled serves 1500 children in 1400 families.

- Family income less than or equal to 100% of State Medium Income: 98.3%
- Homeless within 12 months prior to application: 38 or 2.7% (2.7% of 1500= 41)
- Ethnicity:
 - Hispanic/Latino: 33.4%
 - Non-Hispanic/Latino: 66.6%
- Race (non-Hispanic only):
 - Black: 10.9%
 - White: 45.8%
 - Biracial/multiracial: 17.7%
- Primary home language:
 - English: 66.4%
 - Other than English: 33.6%
- Risk factors (likely underreported at enrollment):
 - CPA involved: 11%
 - Domestic Violence: 12.5%
 - Adult Chronic Health Condition moderate or severe: 18%
 - Parent incarcerated: 2.6%
 - Parent completed:
 - 6th grade: 6.5%
 - 7-12 but no diploma/GED: 20.8%

The snapshot of very low-income families with young children includes those living doubled up due to economics and not by choice, experienced homeless at some point during the year, staying in a motel and staying in housing that is inadequate. These unstably housed families primarily need housing that is subsidized or in some other manner is affordable in relation to their very low income. Other services needed include employment supports, training and/or educational opportunities, affordable childcare, basic needs, behavioral health, and health care.

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

Coordinated Entry (CE) is a process for people to access the homeless prevention, housing, or other services that they need. Coordinated Entry incorporates uniform screening and assessment, prioritization, and program matching, as well as connections to mainstream services to help those seeking to access available programs more effectively. Coordinated Entry data provides additional data points on unmet needs and gaps within the current homeless housing system.

Number of people who had contacted the system and were enrolled in CE Housing (literally homeless) by the date of the PIT 2/21/2022:

	Individuals	Households
Households with Children	820	293
Adult Only Households	1043	910
Total	1863	1203

Total Served in CE 10/1/2021-9/30/2022:

	Individuals	Households
Total	6429	3686
Households with Children		978
Adult Only Households		2706
Unknown		2

HMIS Data – Homeless Housing Availability Postings/Opening- Average Posted Per Month (10/1/2021-9/30/2022):

Permanent Supportive Housing (PSH)	8.25
Other Permanent Housing (OPH)	2.5
Rapid Rehousing (RRH)	11

Total number of homeless housing referrals (households) 10/1/2021-9/30/2022:

	RRH*	PSH	OPH	Total Referrals
Households with Children	56	43	0	99
Adult Only Households	59	54	3	116

*Includes the joint TH/RRH intervention

The serious deficit of homes affordable and available to the qualified populations is both the root cause of the problem, as well as a severe challenge in implementing strategies focused on connecting qualified populations to housing. Additionally, Snohomish County has historically relied heavily on congregate shelter prior to COVID. In response to the pandemic, the shelter system in Snohomish County has been attempting to rapidly expand non-congregate shelter options, including through opportunistic acquisitions of motels, and the addition of pallet shelter projects.

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:

Enter narrative response here.

During 2020 in Snohomish County, the Fair Market Rent (FMR) for a two-bedroom apartment was \$2,099. To afford this level of rent and utilities, without paying more than 30 percent of income on housing, a household must earn \$6,997 monthly or \$83,960 annually. Assuming a 40-hour work week, 52 weeks per year, this level of income translates into an hourly housing wage of \$40.37. To afford a two-bedroom apartment at minimum wage, a household would have to work three full-time jobs. Additionally, there has been a 50-67 percent decline in low rent housing in our region from 2011 to 2017 and new construction has not made up for these declines.

Snohomish County	2020 Fair Market Rent	Income Needed	Hourly Income Needed
Efficiency	\$1,627	\$65,080	\$31.29
1-Bedroom	\$1,741	\$69,640	\$33.48
2-Bedroom	\$2,099	\$83,960	\$40.37
3-Bedroom	\$2,993	\$119,720	\$57.56
4-Bedroom	\$3,524	\$140,960	\$67.77

This challenge is not abating but continuing to grow as rent costs continue to outpace income and wages in Snohomish County. From 2010 to 2019, the HUD-determined fair market rent for a 2-bedroom unit increased 79.8 percent while the median income only increased by 30.7 percent. Snohomish and King Counties are both tied for the highest housing wage in all 39 Washington Counties. Overall, Washington State ranks 7th in the Nation for the highest housing wage.

In addition, living in over-crowded housing and staying with friends or family are often the form of housing instability that can escalate to staying in a car, tent, or shelter.

Identify priority needs for qualifying populations:

Services for new non-congregate shelters, other motel sheltering or other enhanced shelter services are needed options for all qualified populations who are experiencing homelessness. Other mainstream systems, locals services and resources are available options for qualified populations that are not currently experiencing homelessness but may be at-risk of homelessness or experiencing housing instability. Enhancing services for qualified populations experiencing homelessness and residing in shelters will meet the increasing needs of those with serious behavioral health issues. Enhanced services may include more intense services, services of longer duration, and specialized services (e.g., mental health and substance use disorder, supportive employment) that meet individual needs to promote increased stability and movement to permanent housing.

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 data and information provided in this plan through data collected via HMIS and other systems, in addition to wide ranging community, was reviewed and analyzed. The data and community input shows a significant gap for enhanced shelter and housing for all qualifying populations. There are more individuals and families experiencing or at-risk of homelessness and experiencing housing instability than there are housing units or shelter units available to meet the needs. Services are either provided directly through the shelter and housing, or they are complimentary services provided through coordination, referrals or collaborating programs. While there are shelter options with services, there is a lack of enhanced shelter services, especially non-congregate shelters.

For the qualified population of families with young children experiencing housing instability, there is a lack housing subsidies to meet their extremely low-income status. Various services may improve their housing stability by supporting them to increase income and meet various needs that are necessary to sustaining housing.

All qualified populations may benefit from employment supports; higher education, technical skills or trades; subsidized childcare, and behavioral or physical health care. Navigation service can provide a pathway for individuals and families to receive the support they need to access and utilize these other mainstream systems to improve housing stability. These services can support households in building their capacity to obtain and maintain housing on the market, when other subsidized or affordable housing isn't available. This is necessary to help meet the housing needs of a large number of households. There isn't going to be an adequate amount of public financing available to bring a substantial number of new affordable housing units in the near future, so other means of helping people with housing stability through tailored services is a necessary pathway for qualified populations to create capacity for longer term housing stability.

The County has engaged in extensive community input, planning with cities and towns and utilizing data to inform solutions to needs and gaps. These efforts demonstrate that qualified populations can benefit and move toward great housing stability through a variety of services and that there is a significant need to quickly move people from unsheltered situations into shelter or housing. Non-congregate sheltering with enhanced services that creates a bridge to housing has become a high priority to meet some of the highest needs in our communities. Non-congregate shelters can be brought online faster through motel acquisitions or securing individual scattered-site motel rooms, than the lengthy and complicated financing process for new affordable housing. Other motel sheltering or enhancing sheltering services helps meet the varied needs of those experiencing homelessness and supporting movement to greater housing stability.

V. HOME-ARP Activities

Template:

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors: Can draft response once we know what we are doing.

The County will solicit applications through a competitive funding round(s) seeking enhanced services in sheltering, with a high priority for non-congregate sheltering in motels, for populations fitting Qualified Population 1. Applicants will be expected to describe how they will maintain a waitlist for all populations and follow the waitlist priority for QP1. Applications will be recommended for funding through the County's Citizen Participation Process which includes: Technical Advisory Committee funding recommendations to the Policy Advisory Board (PAB); PAB review and recommendations to County Council, and County Council final approval.

Describe whether the PJ will administer eligible activities directly:

The County will subcontract with one or more services providers.

If any portion of the PJ's HOME-ARP administrative funds are 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:

N/A

In accordance with Section V.C.2. of the Notice (page 4), 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.

Template:

VI. Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$6,200,821		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ #		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 1,094,262	15 %	15%
Total HOME ARP Allocation	\$ #		

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

The County will distribute HOME ARP funds through a competitive application process for enhanced services for all qualified populations in shelters, with a high priority for those meeting Qualified Population 1 in non-congregate shelters.

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 shelter and housing inventory along with the gaps identified demonstrate a significant lack of shelter and housing. Non-congregate shelter rose as a priority to more quickly move individuals from unsheltered locations into enhanced shelters through the acquisition motels or other sheltering options. At least 2 motels acquired through other funds will serve as non-congregate shelters serving qualified populations. Other shelter and non-congregate sheltering options are being considered. HOME ARP funds will provide funding prioritized for enhanced services for Qualified Population 1 at new non-congregate shelters that bridge people moving into housing and/or other sheltering options. Development of new housing would take much longer and the needs are urgent requiring a solution for the shorter term, while we continue to work on housing options.

Enhanced services are needed to address the increased behavioral health issues and to promote housing stability and movement to permanent housing. Enhanced services, along with other community resources will be offered through individualized navigation, tailored services planning, and coordination with mainstream systems. HOME ARP funding will be utilized for enhancing services to all qualified populations.

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:

Zero.

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:

Zero

VII. 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 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:

Preference for HOME ARP services will be given to QP 1 residing in shelter programs, with a high priority for new non-congregate shelters. Those residing in the non-congregate shelters will meet the HOME ARP homeless definitions as defined in 24 CFR 91.4(1).

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:

There's an increasing number of QP 1 high needs unsheltered individuals and individuals who were unsheltered and are now in temporary shelters with limited services. Additionally, there is a lack of enhanced shelter services for these individuals who have needs that include significant behavioral health needs. These individuals are often chronically homeless with co-occurring or tri-morbid conditions, and they need more intensive services, longer duration services and other tailored services to obtain and maintain stability and housing. This need has been identified by the County, cities/towns, and residents through various planning efforts over the last few years.

All Qualified Populations will be included on the applicable waitlists, though, it is anticipated that the number of QP 1 residing in selected shelters will exceed available services. The provider(s) selected to provide HOME ARP enhanced services will be responsible for maintaining waitlists and will provide

services based on waitlist placement for those in identified shelters where enhanced services will be provided. QP 1 persons will be offered services first based on waitlist placement. If there are not enough QP 1 persons to serve, then providers will go down the waitlist in chronological order and offer services to other QPs.

VIII. 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):

All QP 1 in selected enhanced shelters may be referred to services that will offered onsite or offsite. Other qualified populations that do not fit QP 1 or when there are no available services slots, may be referred to other community resources.

As noted above, all Qualified Populations will be included on the applicable waitlists, though, it is anticipated that the number of QP 1 residing in selected shelters will exceed available services. The provider(s) selected to provide HOME ARP enhanced services will be responsible for maintaining waitlists and will provide services based on waitlist placement for those in identified shelters where enhanced services will be provided. QP 1 persons will be offered services first based on waitlist placement. If there are not enough QP 1 persons to serve, then providers will go down the waitlist in chronological order and offer services to other QPs.

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.

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):

Enter narrative response here.

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):

Enter narrative response here.

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:

We do not intend to use limited eligibility

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:

Enter narrative response here.

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):

Enter narrative response here.

HOME-ARP Refinancing

Not Applicable. Snohomish County will not be using HOME-ARP funding for refinancing.

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 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***
- ***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.***

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

HOME-ARP- Allocation Plan

Public Comments and Responses

HOME-ARP Allocation Plan

Public Hearing - February 23, 2023

15-Day Public Comment Period - February 22, 2023, through March 8, 2023

#1	Comment	HSD Response
	<p>My name is Karen Hibbert. I am here to ask the <u>Snohomish County Urban County Consortium</u> to consider designating a portion of the Federal funds under discussion today to purchase the property at 19724-64th Avenue West located in the City of Lynnwood to, initially, guarantee that it continues as a Hygiene Center serving unhoused people in the South County area, and to renovate it into a Day Service Center for the unhoused, after purchase.</p> <p>This is not a request that will directly build transitional or permanent housing for those who need it, <u>but it will provide for the immediate needs of those who are waiting for housing.</u> We all know that this wait is frequently in the range of months to years: So, the question to ask ourselves is: What can I say to the person who needs a meal, a place to clean up and get into dry clothing, and a safe place to be indoors, out of the elements, whether that's excessive heat, cold, precipitation or smoke in the air <u>TODAY?</u></p> <p>The Lynnwood Hygiene Center (LHC) was created through a partnership of the City of Lynnwood, Verdant Health Commission and The Jean Kim Foundation to meet the daily hygiene needs of our unhoused neighbors during the COVID pandemic. Many had come to depend on various community meal programs like Trinity Lutheran Church's weekly Neighbors in Need program, which all shut down during the pandemic. Even today, many of these former programs have still not come back to fully serve the ongoing needs of those experiencing homelessness. To fill</p>	<p>Snohomish County acknowledges that the Hygiene Center is an important part of the continuum of services in Snohomish County for families and individuals experiencing homelessness.</p> <p>The proposed project is not an eligible use of HOME-ARP funds.</p>

#1	Comment	HSD Response
	<p>this critical gap, the Lynnwood Hygiene Center operates 6 days a week from 10am-6pm and offers showers, restrooms, and a sense of community. In addition, daily meals, snacks, and clothing are supplied by local charitable groups. There is a small outdoor area where people can sit, rest, and socialize while the center is open. The Lynnwood Hygiene Center is located 2 blocks off Highway 99 and a ½ block south of 196th St. SW (the main east-west thoroughfare through the City of Lynnwood) making it easily accessible by public transportation. The Lynnwood Hygiene Center has comfortably co-existed with its neighbors in this location for at least 3 years and is working to continue this critical social service for the area’s unhoused.</p> <p>The property on which the Lynnwood Hygiene Center sits is owned by a private citizen who has repeatedly indicated an intention to sell the property, at which time the hygiene center will need to vacate the building, which is a former WA State Auto Emissions Testing Center. By using HOME-American Rescue Plan funds to purchase this property, we would be 1) protecting the Hygiene Center from being disbanded (2) making it possible to create a Day Service Center that would offer the current services (restrooms, showers & food) with the addition of year round daytime shelter from the elements, meals/food, and contact with various health & social service agencies that can help individuals access needed services including:</p> <ul style="list-style-type: none"> • Critical connection to enrollment in the Coordinated Entry into Housing System and access to regular follow-up with Housing Navigators; • Medical, dental, and behavioral healthcare (including mental health and substance use treatment); 	

#1	Comment	HSD Response
	<ul style="list-style-type: none"> • Enrollment in appropriate DSHS programs (i.e., Basic Food/Food Stamps, Employment/Training, Cash Assistance, Disability services); • Free cell phones and digital devices through the FTC program <p>(3) eventual development of Non-Congregate Shelter units (temporary shelter) and the site of a reliable emergency overnight congregate shelter. I note that “Acquisition and development of non-congregate shelter is listed as the second highest ranked item for use of the HOME-American Rescue Plan funds in the Snohomish County 2022 community consultation survey.</p> <p>Who I am:</p> <ul style="list-style-type: none"> • Resident of Lynnwood from 1983-2000, resident of Edmonds from 2000 to present. • Internal Medicine physician who worked in the City of Lynnwood from 1999-2019, now retired. • Volunteer at the South Snohomish County Emergency Cold Weather shelter since 2009 and member of the working Board of the shelter, in the role of Medical Advisor, since 2018. <p>Interested parties/stakeholders involved with the Lynnwood Hygiene Center and/or interested in developing a year-round Day Center/Hygiene Center in So. Snohomish County</p> <ul style="list-style-type: none"> • City of Lynnwood • Verdant Health Commission • Jean Kim Foundation • Volunteers of America • Trinity Lutheran Church & Schools/Neighbors in Need • S. Snohomish County Emergency Cold Weather Shelter 	

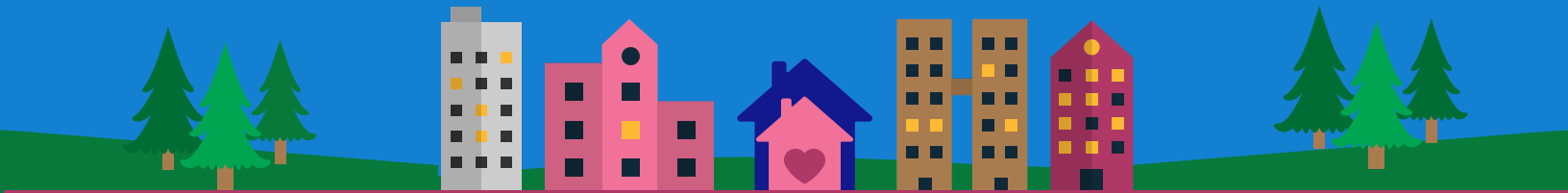
#1	Comment	HSD Response
	<p>Other Notes: The HOME-ARP survey results in ranked order include:</p> <ol style="list-style-type: none"> 1. Production & preservation of affordable rental housing, 2. Acquisition and development of non-congregate shelter(s), 3. Supportive services, and 4. Short or medium-term tenant rental assistance. 	
#2	<p>Sandra Mears, Executive Director of Jean Kim Foundation: I'd stress that the hygiene center is not just a hygiene center although we provided 9,150 showers in 2022, with 600 unduplicated guests. Keep in mind that we have two showers and allow 20 minutes for a shower/dress/undress. We are a hub and encourage providers to partner with us. For example, Mercy Watch is on site every Tuesday providing referral and medical care (wound care), We serve 50 or more individuals a meal six days a week. Essential items to include clothing items are also distributed. LEAD Case Managers are on site meeting with residents.</p>	<p>The County thanks Sandra for the comment. Please see response above.</p>

\$7,295,083 IN HOME-ARP FUNDS FOR SNOHOMISH COUNTY

Snohomish County is receiving \$7,295,083 from the American Rescue Plan's Home Investment Partnership Program (HOME Program). Funds must be spent by September 30, 2030 to assist individuals or households who are homeless, at-risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, with the goal of reducing homelessness and increasing housing stability.

QUALIFYING POPULATIONS

- Homeless
- Other populations that are housing insecure
- At-Risk of Homelessness
- Fleeing Domestic Violence, Sexual Assault, Stalking, or Human Trafficking



ELIGIBLE FUNDING CATEGORIES

Production and Preservation of Affordable Rental Housing:

Acquire, rehabilitate, or construct affordable rental housing primarily for occupancy by qualifying households of individuals and families

Short or Medium Term Tenant Rental Assistance:

Provide time-restricted tenant rental assistance, including rental application fees, security deposits, utility deposits and payments, moving costs, first and last month's rent, payment of rental arrears and short-term to medium-term financial assistance for rent

Supportive Services:

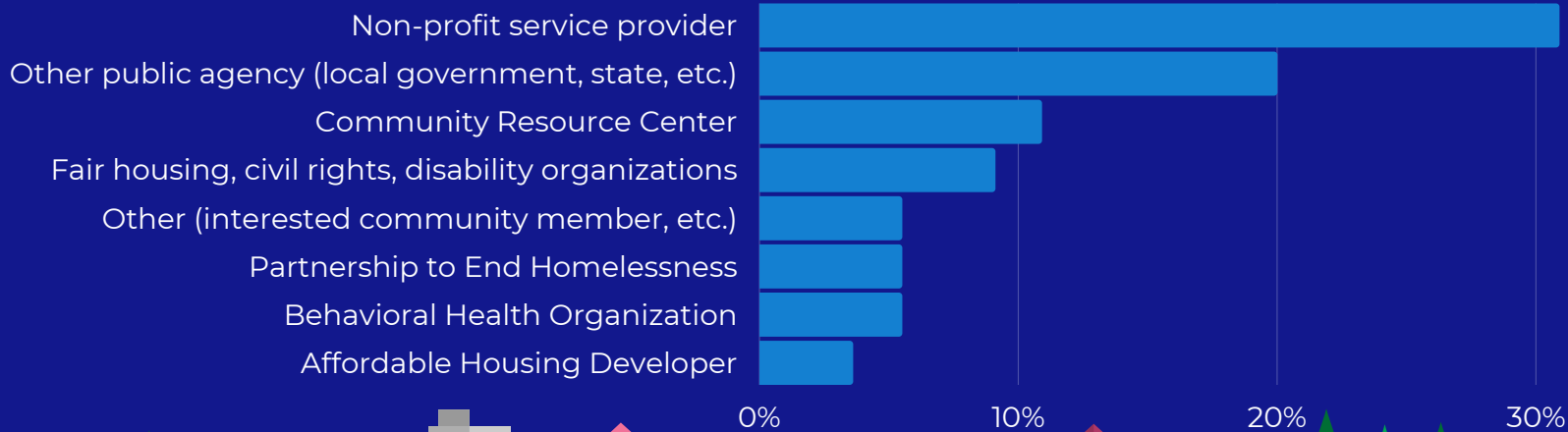
Provide a broad range of supportive services to qualifying individuals or families as a separate activity or in combination with other HOME-ARP activities. Eligible cost examples include childcare, education services, employment assistance and job training, housing search and counseling services, legal services, case management and behavioral health services.

Acquisition and Development of Non-Congregate Shelter(s) [temporary shelter]:

A non-congregate shelter (NCS) is one or more buildings that provide private units or rooms as temporary shelter to individuals and families and does not require occupants to sign a lease or occupancy agreement. HOME-ARP funds may be used to acquire and develop HOME-ARP NCS for individuals and families in qualifying populations. This activity may include but is not limited to the acquisition of land and construction of HOME-ARP NCS or acquisition and/or rehabilitation of existing structures such as motels, hotels, or other facilities to be used for HOME-ARP NCS.

COMMUNITY INPUT ON ALLOCATION OF FUNDS

Survey participants



RANKING OF ELIGIBLE FUNDING CATEGORIES

Overall rank for eligible activities needed most to address homelessness & housing insecurity in Snohomish County

1 Production & Preservation of Affordable Rental Housing

Sub-categories ranked in order of highest priority need

Production of new affordable housing units

Creation of transitional or short-term housing

Renovation/refinancing of existing housing

Additional Needs

Need a full range of housing options. Create a diverse housing stock.

Need more rapid re-housing

Need regulatory changes in zoning & permitting

Low barrier temporary housing options are key

Housing needed for individuals with different cultural backgrounds & there's an urgent need for housing & employment for refugees from Afghanistan, Ukraine, & Congo Republic.

2 Acquisition & Development of Non-Congregate Shelter(s)

Sub-categories ranked in order of highest priority need

Acquisition/development/rehabilitation of existing hotel/motel properties for use as non-congregate shelter

Acquisition/development/rehabilitation of existing properties (non hotel/motel properties) for use as non-congregate shelter

Acquisition of land for development of Non-Congregate Shelters

3 Supportive Services

4 Short or Medium-Term Tenant Rental Assistance