

Waterloo/Cedar Falls HOME Consortium HOME-ARP Allocation Plan



Introduction

On March 11, 2021 President Biden signed into law the American Rescue Plan (ARP). Congress appropriated \$5 billion to be administered through the HOME Investment Partnership for activities primarily benefiting qualifying individuals and families at risk of homeless, or other vulnerable populations. The Waterloo/Cedar Falls HOME Consortium was allocated \$1,780,793 in HOME-ARP funding. Funds will be used to serve qualifying populations in the jurisdiction through HOME-ARP rental housing, supportive services, and acquisition and development of non-congregate shelter. Funds will be used in efforts of ending homelessness, enabling non-profits to quickly rehouse homeless individuals and families to optimize self-sufficiency for families and individuals experiencing homelessness. Activities will primarily benefit households in the qualifying populations. The American Rescue Plan defines qualifying individuals or families as:

QUALIFYING POPULATIONS

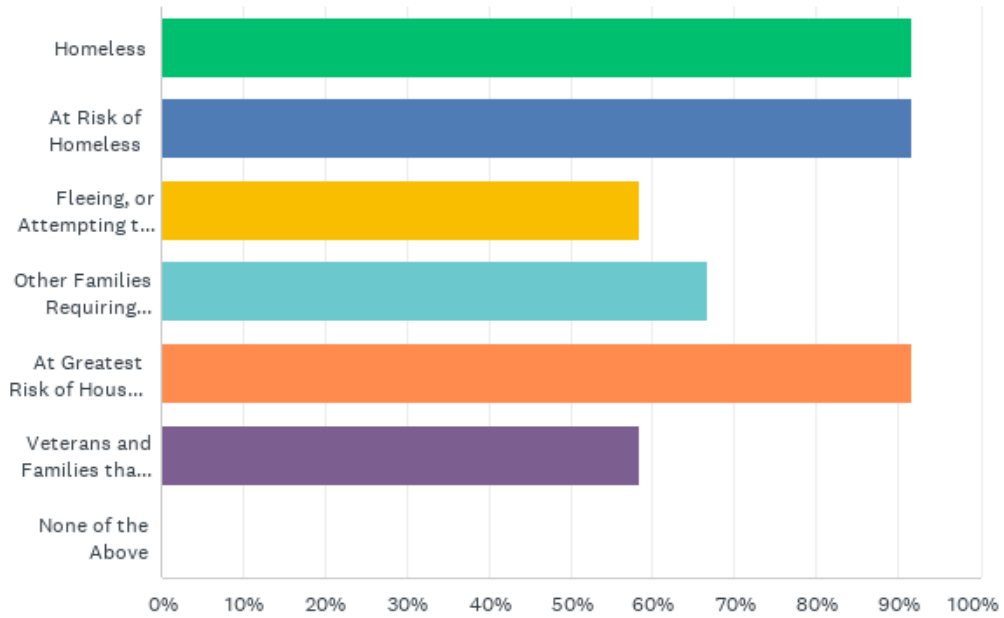
- 1. Homeless**
- 2. At Risk of Homeless**
- 3. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking.**
- 4. Other Populations**
 - Other families requiring services or housing assistance to prevent homelessness
 - At greatest risk of housing instability

Consultation

Waterloo Community Development began consultation during the annual informational meeting held on November 29, 2022 to discuss funding opportunities. Public service agencies, non-profit and for-profit developers, other city departments and key stakeholders for both Waterloo and Cedar Falls were invited to the informational meeting. Most service providers included in the consultation process serve both the Waterloo and Cedar Falls area. The American Rescue Plan was discussed during the meeting and agencies agreed to participate in the consultation process. Virtual and in person meetings were held with agencies to discuss the unmet needs of each qualifying population, discuss gaps in housing and shelter inventory, homeless assistance and services, and homeless prevention. A survey was emailed to agencies and service providers

whose clientele included individuals of the qualifying populations. The survey was used to identify unmet needs, gaps in housing or the service delivery system.

Agencies Consulted in Waterloo/Cedar Falls Serve the Following Populations:



Agencies Consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Community Housing Initiatives	COC; Permanent Supportive Housing Homeless At Risk of Homeless Domestic Violence	Survey response & In person meeting on 12-5-2022 and 2-13-23	Discussed coordinated entry and domestic violence lists and gaps in homeless support and services. The additional funds needed to provide casework and rent for homeless individuals. Issues with transportation. Demographics of individuals served in Waterloo. Mental health, addiction and criminal backgrounds being the largest barriers to permanent housing. Lack of rental housing that will pass an HQS inspection.
House Of Hope	Supportive services for single mother families in homelessness and women aging out of foster care. Transitional Housing Other Permanent Housing Homeless At Risk of Homeless Domestic Violence Homeless Prevention Greatest Risk of Housing Instability	Survey response & Virtual meeting on 12-12-2022	Discussed the programs offered and what the barriers were for the individuals being served by the agency. Demographics of the populations being served. Transportation, child care and lack of peer and family support were identified unmet needs. Underserved population is at risk of homeless and the ALICE threshold.
The Salvation Army	Emergency Overnight Shelter Homeless At Risk of Homeless Domestic Violence Homeless Prevention Greatest Risk of Housing Instability Veterans	In person meeting on 12-12-2022 and 2-10-23	Discussed the lack of safe affordable housing that will pass HQS. Discussed other barriers including transportation, past evictions, criminal records. Unmet needs include holistic and on-going support and the lack of a single entity capable of addressing the range of housing needs or capable of facilitating care

			management regardless of where the household falls on the spectrum. Discussed the wide range of demographics, underserved and disproportionate populations. We also discussed that agency's specific needs.
Hospitality House of the Cedar Valley	Warming Center Homeless At Risk of Homeless Domestic Violence Greatest Risk of Housing Instability Veterans	Survey Response & Virtual Meeting on 12-13-22	Discussed services provided by the agency. Discussed barriers of the individuals they serve which include mental health, substance abuse and employment. Gaps in housing include landlords that are willing to rent to individuals with high barriers. Shelters do not offer services long enough to lead to some stability and self-sufficiency.
Friends of the Family	Housing and Support Services Emergency Shelter Permanent Supportive Housing Other Permanent Housing Homeless At Risk of Homeless Domestic Violence Homeless Prevention Greatest Risk of Housing Instability	Survey Response & In person meeting on 12-13-22 and 2-10-23	Discussed the demographics of the individuals served. Mental health, substance abuse and lack of support were identified as barrier. Unmet needs included funding for individuals who needed rent assistance and security deposits, case management and ongoing support. Funding to get everyone on the coordinated entry list into permanent housing and provide ongoing support to ensure self-sufficiency. We also discussed how street outreach was needed to assist individuals experiencing homelessness. Friends of the Family was also looking at ways to get families and individuals housed quickly as the average time frame currently is 19 days. We discussed how most homeless individuals have multiple barriers that are not overcome in a short time frame.
Waterloo Housing Authority	Waterloo Public Housing Authority	Survey Response &	Discussed how the PHA is issuing voucher for rental assistance however, clients are unable to find

	<p>Section 8 Voucher and Public Housing</p> <p>Other Permanent Housing</p> <p>Homeless At Risk of Homeless Domestic Violence Homeless Prevention Greatest Risk of Housing Instability Veterans</p>	<p>Virtual Meeting on 12-14-22</p>	<p>decent units that will pass HQS. Discussed why the City of Waterloo was only issued a fraction of the Emergency Housing Vouchers as compared to other cities in Iowa. Discussed how individuals with evictions on their records cannot find housing.</p>
Cedar Falls Housing Authority	<p>Cedar Falls Public Housing Agency</p> <p>Homeless At Risk of Homeless Domestic Violence Homeless Prevention Greatest Risk of Housing Instability Veterans</p>	<p>Virtual Meeting on 12-14-22</p>	<p>Increasing rental prices continue to climb which in turn is eliminating the rental as a Section 8 possibility. Units with rents that will work with the program will not pass the HQS inspection. More affordable rental units are needed at market rates that will work with the Section 8 Program.</p>
Unity Point Health Black Hawk, Grundy Mental Health Center	<p>Health Care Mental Health</p> <p>Homeless At Risk of Homeless Homeless Prevention Greatest Risk of Housing Instability Veterans</p>	<p>Survey Response & Virtual Meeting on 12-19-22</p>	<p>Largest barrier to housing is affordability. We could overcome this gap with providing housing vouchers for rent on an ongoing basis. Barriers are reliable transportation. Bus routes need to be increased especially to Tysons. It was also discussed that there is currently a need to increase employee wages at the local shelter to retain good employees to keep the shelter in operation. Deposit assistance and bus passes were also a need.</p>
Cedar Valley Housing Corporation	<p>Non-Profit Agency looking to provide full services to homeless individuals with mental health and substance abuse issues that need ongoing case management.</p>	<p>Survey Response & Virtual Meeting On 12-19-22</p>	<p>Discussed the demographics of the population served by the agency. Discussed the need for housing that would also provide ongoing case management for individuals with high barriers. There is a need for landlords that are willing to rent to individuals with high barriers such as mental health, substance abuse</p>

<p>Iowa Heartland Habitat for Humanity</p>	<p>Non-Profit Housing Agency</p> <p>Greatest Risk of Housing Instability</p>	<p>Survey Response</p>	<p>The greatest barriers for the clients served is low income and high debt and being able to afford rental housing while paying down debt. Unmet needs of the individuals served by the agency include credit counseling and accountability.</p>
<p>Amani Community Services</p>	<p>Non-Profit Agency serving victims of domestic and sexual violence</p> <p>Homeless At Risk of Homeless Domestic Violence Homeless Prevention At Greatest Risk of Housing Instability</p>	<p>Survey Response</p>	<p>Barriers to housing include prior evictions and affordable rent. Suggested rent and deposit programs. Unmet needs include legal services for housing issues and there are not enough shelters in the area. Funding to assist clients with housing or hotel stays until the client finds housing is needed.</p>
<p>Central Iowa Shelter & Services</p>	<p>Emergency Shelter and Housing Services</p> <p>Emergency Shelter Transitional Housing Permanent Supportive Housing</p> <p>Homeless At Risk of Homeless Greatest Risk of Housing Instability Veterans</p>	<p>Survey Response</p>	<p>The greatest barriers for the individuals the agency serves is income. The unmet needs are construction of affordable housing. Policy issues such as single-family residential zoning can also affect Black and Latino families and low-income families at higher rates because they're statistically more likely to be renters or live in multi-family households. The agency needs more case management.</p>
<p>Northeast Iowa Food Bank</p>	<p>Non-Profit Agency Food Bank</p> <p>Homeless At Risk of Homeless Domestic Violence Prevent Homelessness Greatest Risk of Instability Veterans</p>	<p>Survey Response</p>	<p>Greatest barriers for the clients served are low paying jobs and retirement income isn't enough to support a household. More affordable housing is needed. More homeless services are needed.</p>

Black Hawk County Veteran Affairs	Veteran Services	Email and Survey request was made	No Response
Hawkeye Area Community Action Program (HACAP)	Homeless Services	Survey request was made	No Response
City of Waterloo Human Rights Commission	Civil Rights Agency Homeless At Risk of Homeless Domestic Violence Prevent Homelessness Greatest Risk of Instability Veterans	Survey Response & In Person Meeting on 1-6-23	Discussed barriers to housing such as prior evictions, criminal records and mental health issues. Tenant landlord issues that lead to homelessness. Discussed fair housing and the HOME-ARP allocation.

Feedback received and results of upfront consultation with these entities:

The consultation process concluded that homelessness is a complex problem with no easy solution. Individuals who are homeless or are at risk of being homeless are all faced with very different circumstances. Many of the populations faced the same unmet needs. Rental assistance, affordable housing and case management were the top unmet needs. The rising cost of rental units and landlords unwilling to rent to individuals with prior evictions, criminal history or mental illness were also common variables. Many individuals within the qualified populations lack peer and family support. With no support system individuals who have been through the coordinated entry system and placed in temporary or permanent housing often fail due to lack of transportation, lack of child care, substance abuse and mental health issues.

Shelter providers discussed the lack of units, shelter beds and inability to provide case management. It was determined there is a need for 50-60 additional units to place homeless individuals. The coordinated entry system scores individuals on their individual circumstances and needs. A person who is considered literally homeless will score higher than individuals who are homeless but have minimum resources. Individuals and families with a lower score tend to remain on the coordinated entry list until they are able to self-resolve because there are not enough resources to assist everyone on the coordinated entry list.

Public Participation

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: 2/17/2023*
- *Public comment period: 2/18/2023 - 3/4/2023*
- *Date(s) of public hearing: 3/6/2023*

Public participation process:

A Notice for the HOME-ARP 15-day comment period was posted in the Waterloo Courier legal section on February 17, 2023. This public comment period was held from February 18-March 4, 2023. This notice was also placed on the City of Waterloo and City of Cedar Falls websites as well as the Community Development and City of Cedar Falls Facebook pages. As stated in the notice, citizens could either email or mail their comments. A public hearing was held during the City of Waterloo council meeting on March 6, 2023. The City of Cedar Falls held a public meeting during their February 20, 2023 City Council meeting to discussed the HOME-ARP Allocation Plan.

Efforts to broaden public participation:

Copies of the draft HOME-ARP Allocation Plan will be distributed to partner entities that serve significant populations which include persons in legally protected classes (racial/ethnic minority, persons with disabilities, etc.), persons in special population (at-risk youth), persons in a federal “Presumed Benefit” category (abused spouses, persons with AIDS/HIV, persons experiencing homelessness) or persons who may otherwise have barriers to public participation.

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

Enter narrative response here.

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

Enter narrative response here.

Needs Assessment and Gaps Analysis

Homeless Needs Inventory and Gap Analysis Table for Waterloo/Cedar Falls Combined

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	16	6	60	0	0								
Transitional Housing	0	0	3	0	3								
Permanent Supportive Housing	2	1	31	0	19								
Other Permanent Housing	18	3	2	0	0								
Sheltered Homeless						150	816	78	78				
Unsheltered Homeless						31	296	6	0				
<i>Current Gap</i>										21	8	59	59

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

The current inventory was based on the Continuum of Care Housing Inventory Count. The homeless population was based on the 2022 Point in Time Count. The gap analysis was based on the current number of families and individuals on the Iowa Balance of State Coordinated Services Network- Homeless Prioritization List waiting to be served. The prioritization list was chosen to demonstrate the gap analysis because it serves a more targeted area, which includes our jurisdiction.

Housing Needs Inventory and Gap Analysis Table for the City of Waterloo

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	11,080		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	715		
Rental Units Affordable to HH at 50% AMI (Other Populations)	575		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		2,650	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,830	
<i>Current Gaps</i>			3,190

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

The 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data shows the City of Waterloo has 11,080 rental units. 3,365 renters have a household income at or below 30% area median income (AMI). Of those renters 2,650 have a cost burden greater than 30% of their annual income. This leaving 715 rental units affordable to renters with income at or below 30% AMI. 2,400 renters have a household income at or below 30% AMI. Of those renters 1,600 have a cost burden greater than 30% of their annual income. This leaving 800 units affordable in the 30-50% AMI category.

The CHAS data indicates in the category Income by Housing Problems (for renters only) having at least 1 of 4 housing problems is 2,650 for households at or below 30% AMI, and 1,830 for households at 31-50% AMI.

Housing Needs Inventory Gap Analysis for the City of Cedar Falls

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	5,645		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	230		
Rental Units Affordable to HH at 50% AMI (Other Populations)	265		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		1375	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		830	
Current Gaps			1,710

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

The 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data shows the City of Cedar Falls has 5,645 rental units. 1,605 renters have a household income at or below 30% area median income (AMI). Of those renters 1,375 have a cost burden greater than 30% of their annual income. This leaving 230 rental units affordable to renters with income at or below 30% AMI. 1,095 renters have a household income at or below 30% AMI. Of those renters 830 have a cost burden greater than 30% of their annual income. This leaving 265 units affordable in the 30-50% AMI category.

The CHAS data indicates in the category Income by Housing Problems (for renters only) having at least 1 of 4 housing problems is 1,375 for households at or below 30% AMI, and 830 for households at 31-50% AMI.

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

The Iowa Balance of State Coordinated Services Network utilizes a computerized record keeping system that captures information about people experiencing homelessness and at risk of homeless and homeless prevention. This system is administered by the Institute for Community Alliances. Individuals and families are assessed and given a Vulnerability Index Score (VI) which determines the level of need on the prioritization lists. Scores of 8 or above have the highest priority. The list determines if the individual or family is chronically homeless, identifies the length of homelessness, and whether the client is a victim of domestic violence, veteran status, literally homeless, and disabled.

Homeless as defined in 24 CFR 91.5

On January 24, 2023 the Iowa Balance of State Coordinated Services Network Homeless Prioritization List contained 65 homeless clients listed in the Black Hawk, Tama and Grundy county area and 2 in the Eastern Iowa region. 34 single individuals had a VI score of 8+ were in need of permanent supportive housing. 22 single individuals with a VI score of 4-7 needed rapid rehousing. 3 single individuals were listed as no support needed. The list contained 5 families with a VI score of 9+ needing permanent supportive housing and 4 families with a VI score of 4-8 needing rapid rehousing. 1 family was listed as needing no supports. December 2022 data indicates single individuals remained on the prioritization list an average of 77 days, while a family's average number of days on the prioritization list was 87.

The 2022 Point in Time Count for the Iowa Balance of Care CoC showed an overall homeless count of 1,601 individuals. 383 individuals were under the age of 18, 120 were ages 18-24, 1,098 were over age 24. The overall data indicated 1,058 were White/Caucasian, 371 were Black/African American, 29 Asian/Asian American, 31 American Indian/Alaska Native, 4 Hawaiian/Pacific Islander, and 108 were multiples races. 161 individuals were Hispanic and 1,440 were Non-Hispanic. The report also indicated overall people in families was 584.

The Salvation Army of Waterloo/Cedar Falls sheltered 604 individuals. Of those sheltered, 484 were adults, while 120 were children. The most common ages served were 25-44. 318 White/Caucasian, 230 Black/African/American, 5 Asian/Asian American, 7 American Indian/Alaska Native, 6 Native Hawaiian/Pacific Islander, 36 were multiple races, and 2 preferred not to answer. 581 individuals were Non-Hispanic/Non-Latino, and 23 identified as Hispanic/Latino.

At Risk of Homelessness as defined in 24 CFR 91.5

On January 24, 2023 the Iowa Balance of State Coordinated Network Prevention Prioritization List contained 135 clients. 13 clients were listed as having a need for strong recommendation for financial and case management support with a VI score of 32+. 49 clients were listed as needing recommendation for financial and/or case management support with a VI score of 24-31. 40 clients were listed as needing assistance as resources allow, consider financial and/or case

management support with a VI score of 17-23. 34 clients were listed as no assistance provided; may however, provide referral to mainstream resources with a VI score of 0-16.

The Comprehensive Housing Affordability Strategy (CHAS) data for the City of Waterloo showed 5,165 households below 30% area median income (AMI), 4,360 households at 31-50% AMI, and 5,645 households at 51-80% AMI. Of the households listed with income below 30% AMI 3,850 had a housing cost burden greater than 30% of their household income and 2,875 had a housing cost burden greater than 50% of their household income. Of the households listed with income at 31-50% AMI 2,385 had a housing cost burden greater than 30% of their household income and 470 had a housing cost burden greater than 50% of their household income.

The Comprehensive Housing Affordability Strategy (CHAS) data for the City of Cedar Falls showed 1,980 households below 30% area median income (AMI), 1,885 households at 31-50% AMI, and 2,640 households at 51-80% AMI. Of the households listed with income below 30% AMI 1,705 had a housing cost burden greater than 30% of their household income and 1,495 had a housing cost burden greater than 50% of their household income. Of the households listed with income at 31-50% AMI 1,125 had a housing cost burden greater than 30% of their household income and 715 had a housing cost burden greater than 50% of their household income.

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

On January 24, 2023 the Iowa Balance of State Coordinated Services Network Domestic Violence Prioritization List contained 78 homeless clients listed in the Black Hawk, Tama and Grundy county area. 39 single individuals had a VI score of 8+ were in need of permanent supportive housing. 12 single individuals with a VI score of 4-7 needed rapid rehousing. 2 single individuals were listed as no support needed. The list contained 20 families with a VI score of 9+ needing permanent supportive housing and 5 families with a VI score of 4-8 needing rapid rehousing.

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 Comprehensive Housing Affordability Strategy (CHAS) for the City of Waterloo indicates there are 2,875 households under 30% AMI with a housing cost burden greater than 50% of the household income. Data shows there are 9,525 households in the Waterloo area with household income below 50% AMI.

The Comprehensive Housing Affordability Strategy (CHAS) for the City of Cedar Falls indicates there are 1,495 households under 30% AMI with a housing cost burden greater than 50% of the household income. Data shows there are 3,865 households in the Cedar Falls area with household income below 50% AMI.

Other populations are often hard to track and serve and have the most unmet needs. These populations do not meet the definitions of homeless due to the requirements of the classification. They are often living in hotels or move frequently from place to place.

The January 24, 2023 Iowa Balance of State Coordinated Services Network Homeless Prioritization List identifies Veterans as a category. The list currently shows 3 homeless individuals in need of assistance. Hawkeye Area Community Action Program (HACAP) pulls the Veteran population from the list each week as available resources allow.

Current resources available to assist qualifying populations

Additional resources available for homeless and homeless prevention not included in the tables listed:

Waterloo Housing Authority

Housing Choice Vouchers-	1063 Authorized	980 Leased
VASH Vouchers-	19 Authorized	16 Leased
Emergency Housing Vouchers-	15 Authorized	10 Leased
Foster Youth to Independence Vouchers-	9 Authorized	1 Leased
Public Housing Units	50 Available	50 Leased

Cedar Falls Housing Authority

Housing Choice Vouchers-	326 Authorized*	184 Leased*
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Community Housing Initiatives

HUD CoC Permanent Supportive Housing	13 Authorized*	7 Leased*
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Salvation Army

Men’s Shelter	18 Beds
Women & Children’s Shelter	32 Beds
Family Shelter	6 Beds

Friends of the Family

Family Beds	16 Beds
Adult Only Beds	5 Beds
Overflow/Voucher	9 Vouchers

* HUD funds authorized will only support the current lease rate.

Unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

The unmet housing needs of the homeless population include affordable rental units that meet the minimum housing standards (HQS), long term (more than 2 years) and medium-term (3-24 months) rental assistance, shelters that accommodate couples, single fathers with children and elderly patients that are released from care facilities. The unmet service needs of this population include substance abuse treatment, mental health treatment and ongoing case management.

At Risk of Homelessness as defined in 24 CFR 91.5

The unmet housing need of the at risk of homelessness populations include funding for rental assistance, rental arrears, and utility payments, affordable housing that can pass HQS inspection that can be rented with ongoing rental assistance. The unmet service needs of this population include childcare, transportation, job training and life skills training.

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

The unmet housing need of this qualifying population is rental assistance and affordable housing. Security and utility deposits are also unmet housing needs. When a person or family is fleeing an abuser or an abusive situation they are often housed in hotels until shelter space opens up. In turn, shelters are not a good long term option for rebuilding and healing. The unmet service needs include case management and funding to provide services such as credit counseling, and legal assistance.

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 unmet housing needs of this population include affordable housing that will pass an HQS inspection, rental assistance and landlords that will rent to high barrier individuals. The unmet service needs of this population include case management, life training skills and employment assistance.

Gaps within the current shelter and housing inventory as well as the service delivery system:

Shelter Gaps:

The Salvation Army is the only provider of shelter to two-parent households, single fathers with children and elderly couples. There is currently one family shelter facility in operation that can support a family setting or an elderly couple. Therefore, if the unit is in use or damaged from another occupant the family is required to split up. Women and children are sent to the women and children's shelter while the men are sent to the men's shelter.

Individuals Incapable of Self-Care: No agency is equipped to provide shelter to those incapable of self-care. There is a significant lack of assisted living opportunities in our community.

Housing Gaps:

Affordable housing that meets the minimum housing quality standards.

Service Gaps:

Gaps in service is the amount of time an individual is allowed to stay in a shelter. Currently an individual can stay in a shelter for 28 days. The average wait time for an individual to be taken off the Homeless Prioritization List is 77 days for single individuals and 87 days for families. If an individual is in a shelter and is unable to obtain a more permanent type of housing they are required to leave the shelter.

Post-Homeless follow up support: Shelter stays are time-limited and therefore focus on housing solutions. Less focus is given to maintaining housing and to addressing the issues that first led to the homelessness. This lack of follow up support leads to the reoccurrence of homelessness for many since the contributing factors are never fully addressed.

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:

Other populations will be assisted in accordance with the definition provided in the HOME-ARP Notice including:

1. Has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);
2. Has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

Veterans and Families that include a Veteran Family Member that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

Identify priority needs for qualifying populations:

Homeless Populations

The priority need identified for homeless populations is supportive services. Specific priorities identified include childcare, mental health services, outreach services, substance abuse treatment services, transportation, case management, security deposits, short term and medium term rental assistance (3-24 months).

At Risk of Homelessness Populations

The priority need identified for at risk of homelessness populations is decent and safe affordable housing. CHAS data shows the City of Waterloo has 15,170 households with an income at or below 80% AMI. Of those households 7,275 (48%) have a housing cost burden greater than 30% of the household income. In addition, The City of Cedar Falls has 6,508 households with an income at or below 80% AMI. Of those households 3,650 (56%) have a housing cost burden greater than 30% of the household income.

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

The priority need identified for individuals and households fleeing, or attempting to flee, domestic violence, sexual assault, stalking, or human trafficking was family shelter housing, affordable housing and supportive services. Many individuals and families require short term shelter assistance until they are able to find more permanent housing. Supportive services such as rental and deposit assistance, transportation, and case management are needed to stabilize the individuals and families fleeing, or attempting to flee, domestic violence, sexual assault, stalking and human trafficking.

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

Other families requiring services or housing to prevent homelessness-

At greatest risk of housing instability-

Veterans and families that include a veteran family member-

The priority need identified for these three other populations was supportive services. Case management, substance abuse treatment and/or mental health treatment, and life skills training were the top priorities identified for these populations during the consultation process.

Individuals under this category tend to fall into homelessness or at risk of homelessness due to multiple contributing factors. Mental health and/or substance abuse was the number one identified reason for chronic homelessness and individuals being at risk of homelessness.

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 current inventory was based on the Continuum of Care Housing Inventory Count. The homeless population was based on the 2022 Point in Time Count. The gap analysis was based on the current number of families and individuals on the Iowa Balance of State Coordinated Services Network- Homeless Prioritization List of individuals waiting to be served. It was determined that the best way to analyze the gap was to look at the current unhoused populations. The Homeless Prioritization List is a snapshot of unserved individuals. This representing the currently gap in the ability of service providers to house these individuals due to available resources.

HOME-ARP Activities

Method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, sub recipients and/or contractors:

A notice of funding availability will be listed in the Waterloo/Cedar Falls Courier, The City of Waterloo and City of Cedar Falls websites, The City of Waterloo, Community Development, and City of Cedar Falls Facebook pages, and sent out to all agencies that were consulted during the HOME-ARP consultation process. The notice will include the amount of funding available for each activity to address the qualifying populations. Applications will be scored based on criteria specific to HOME-ARP. Funding will be awarded to agencies and projects to serve all of the qualifying populations and address all priority needs.

Describe whether the PJ will administer eligible activities directly:

The City of Waterloo and the City of Cedar Falls will administer the development and support of affordable housing activities. These activities will follow our regular procurement and rehabilitation policies and will be carried out by the Community Development rehabilitation specialists. Supportive services and acquisition and development of non-congregate shelter activities will be contracted with agencies.

If any portion of the PJ's HOME-ARP administrative funds are provided to a sub recipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the sub recipient or contractor is responsible for the administration of the PJ's entire HOME-ARP

grant, identify the sub recipient or contractor and describe its role and responsibilities in administering all of the PJ’s HOME-ARP program:

Not Applicable. The City of Waterloo staff carried out all planning, consultation, and writing of the HOME-ARP Allocation Plan.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 822,371		
Acquisition and Development of Non-Congregate Shelters	\$ 220,652		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 470,652		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 267,118	15 %	15%
Total HOME ARP Allocation	\$ 1,780,793		

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

During the consultation process it was determined that affordable housing, case management, substance abuse and mental health treatment was an unmet need of all the qualifying populations. Family shelter was also an unmet need for multiple qualifying populations. The HOME-ARP allocation will be distributed to agencies working directly with the qualified populations to provide support services which includes case management, mental health and substance abuse treatment. Funding will be distributed to landlords and/or developers to acquire, rehabilitate or construct rental housing primarily for occupancy by households of individuals and families that meet one or more of the HOME-ARP qualifying populations. Funding will be allocated to homeless shelter providers to acquire and develop HOME-ARP non congregate shelter for individuals and families in qualifying populations. Priority will be given to agencies looking to acquire and develop family shelter.

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:

Currently each service provider is tasked with providing emergency shelter, transitional shelter and permanent supportive shelter or short term supportive services. When an individual or family is faced with homelessness the emergency shelter provider’s main goal is to get the individual out of the shelter and into more permanent housing. Shelter providers can only provide services for a limited number of days. Transitional and permanent supportive housing agencies must also move quickly to stabilize the individual or family. None of the service providers currently have resources to provide on-going case management and support to prevent the individual or family

from becoming homeless in the future. Agencies lack resources to address the root of what causes an individual to become homeless or chronically homeless. Mental health treatment, substance abuse, life skills training, job training, transportation and childcare are all contributing factors. Individuals and families lack support systems that prevent chronic homelessness.

Families, single fathers and elderly couples faced with homelessness lack shelter facilities that support the family demographic. These families are often separated or sheltered in hotels due to lack of proper family shelter facilities.

Once an agency has available resources to address the individuals and families on the prioritization lists, they are unable to find adequate housing that will pass a minimum housing quality standards inspections (HQS). CHAS data shows the City of Waterloo has 12,435 and the City of Cedar Falls has 6,590 households having at least 1 of 4 housing, and severe housing problems including incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, and a cost burden greater than 30% and 50%.

HOME-ARP funding was allocated to supportive services, development and support of affordable housing, and acquisition and development of non-congregate shelter to address the gaps in these priority needs.

HOME-ARP Production Housing Goals

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

The estimated number of HOME-ARP rental units that will be supported through this allocation is 6. This estimate is subject to change based on the funding requested through the application process.

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:

It is estimated that The City of Waterloo will produce 5 and the City of Cedar Falls will produce 1 affordable rental unit through acquisition, rehabilitation or construction. Projects that are awarded HOME-ARP funds will be required to rent to individuals and families based on their qualifying household status. Funds will be used on existing rental units to bring them to minimum housing quality standards (HQS), or to develop new affordable rental housing. Rental units will be used to house individuals and families from the Homeless Management Information System (HMIS) and Domestic Violence Information Management System (DVIMS) prioritization lists. If there are no individuals or families from the prioritization lists the landlord may rent the unit to an individual or family meeting one or more of the HOME-ARP qualifying populations.

Preferences

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

Preference will be given to individuals and families in qualifying populations based on prioritization. Participants receiving assistance will be selected through the Iowa Balance of State Coordinated Service Network coordinated entry process. The process is a centralized or coordinated process designed to coordinate program participant intake assessment and provision of referrals. The coordinated assessment system covers the geographic area, is easily accessed by individuals and families seeking housing or services, is well advertised, and includes a comprehensive and standardized assessment tool that increases the efficiency of local crisis response systems and improves fairness and access to resources and prioritizes people who are most in need of assistance. The coordinated entry process provides prioritization lists for homeless, victims of domestic violence- homeless, and homeless prevention. Through the coordinated entry process an assessment is conducted by a trained assessor to determine a household's current housing and service needs, risk of harm, risk of future or continued homelessness, and other adverse outcomes. Next is the scoring process of deriving an indicator of risk, vulnerability, or need based on responses to assessment questions. Based on the scoring the individual or family is prioritized or ranked in order of priority. Prioritization ensures 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. Participants are taken from the list in order of highest score. In the event of a tied score, tie breakers are in place to further assess the highest need and vulnerability. Tie breaker 1 is chronically homeless, tie breaker 2 is length of homelessness, tie breaker 3 is domestic violence, and tie breaker 4 is Veteran status. Therefore, in the event of a tied score certain subpopulations of homeless are given a preference based on the tie breakers in the respective order. Next, eligibility is determined to see if participants meet project-specific requirements of the projects for which they are prioritized and referred. If the first individual or family on the prioritization list does not meet the requirements of the program for which there are available resources, the agency will move to the next participant on the list and so on. For example, a supportive service agency may have a program that prioritizes the chronically homeless with VI scores of 8+ to meet their specific program requirements. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking population will give preference to individuals and families that are homeless.

Non-congregate shelter acquired, rehabilitated or constructed with HOME-ARP funds may be subject to preferences. If a single individual is taken from the prioritization list they may be sheltered in a unit that will be more suitable for a single individual which allows the family shelter to remain available to families that cannot be housed in other shelter settings.

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:

Multiple agencies participate in the coordinated entry process allowing participants to receive specialized case management based on needs. The coordinated entry process covers the entire geographic area of the City of Waterloo and Cedar Falls jurisdictions. Agencies can be easily accessed by individuals and families seeking housing or services. Coordinated entry provides affirmative marketing and outreach to provide supportive services to eligible persons regardless of race, color, national origin, religion, sex, age, familial status, or disability who are least likely to apply in the absence of special outreach, and maintain records of those marketing activities. Access point agencies provide an initial, comprehensive assessment of individuals and families for housing and services based on prioritized need. It also includes a specific policy to guide the operation of the centralized or coordinated assessment system to address the needs of individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking, but who are seeking shelter or services from non-victim specific providers. The agencies participating in the coordinated entry process are providing the supportive services, emergency shelter and permanent supportive housing and identify the unmet needs of the qualifying populations.

Referral Methods

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):

Referrals to HOME ARP activities will be a direct referral from an agency participating in Coordinated Entry (CE). The CE will provide the prioritization lists directly to the sub recipients for supportive services, admittance to a HOME-ARP rental unit, or occupancy of a non-congregate shelter unit. Agencies, developer and landlords funded through the HOME-ARP allocation will assist individuals and families through the HUD Coordinated Entry Process.

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:

Each qualifying population will be allocated funds for activities that serve the unmet needs.

Homeless Populations

The homeless population will be served through the CE "Homeless Prioritization List" through the following activities: supportive services, acquisition and development of non-congregate shelter, development of affordable rental housing.

At Risk of Homelessness Populations

The at risk of homelessness population will be served through the CE “Homeless Prevention Prioritization List” through the following activities: supportive services, development of affordable rental housing.

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

The fleeing, attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking population will be served through the CE “Domestic Violence Information Management System Prioritization List (DVIMS)” through the following activities: support services, acquisition and development of non-congregate shelter, development of affordable housing.

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

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability will be served through the CE “Homeless Prevention Prioritization List” through the following activities: supportive services, development of affordable housing.

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):

The CE uses 4 types of assessments to place individuals on the 3 prioritization lists. The Vulnerability Index- Service Prioritization Decision Assistance Tool (VI-SPDAT) for Single Adults, VI-SPDAT for Families, and VI-SPDAT for homeless youth are used to assess participants on the Homeless and DVIMS Prioritization Lists and the Homeless Prevention Assessment is used to assess participants for the homeless prevention prioritization list.

Limitations in a HOME-ARP rental housing or NCS project

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:

HOME-ARP Non-Congregate Shelter will be limited to homeless participants in the following qualified population categories: Homeless, and Fleeing, Attempting to Flee, Domestic Violence, Sexual Assault, Stalking, or Human Trafficking. HOME-ARP rental housing will serve all qualifying populations.

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:

Rental Housing-

The PJ does not intend to place any unique limitations on the use of the HOME-ARP funds to support rental house needs described in this plan outside of any existing local, state or federal codes. Our local codes have requirements that all rental properties be registered in order to perform a life-safety review of the unit and ensure appropriate occupancy standards based on the capacity of the unit. There are no additional unique limitations anticipated with programs to be offered through HOME-ARP funding.

Any limitations found that do not follow fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a), 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 will be rejected.

Non Congregate Shelter Units-

The type of non-congregate shelter units will be determined through the application process. Family shelter is a current unmet need of homeless individuals. Non-congregate shelter acquired, rehabilitated or constructed with HOME-ARP funds may be subject to preferences. If a single individual is taken from the prioritization list they may be sheltered in a unit that will be more suitable for a single individual which allows the family shelter to remain available to families that cannot be housed in other shelter settings.

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):

If a participant from a qualifying population cannot be served due to landlord tenant criteria or rental code ordinances with HOME-ARP rental housing, the participant will be provided case management to seek alternative housing options. Non-Congregate Shelter is limited to homeless individuals in the qualifying populations. Shelter is not needed for the at risk of homelessness and other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability populations. Participants of these categories will be assisted through HOME-ARP funds designated for affordable housing and supportive services.

HOME-ARP Refinancing Guidelines

Not Applicable. There is no intent to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

- *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*

N/A

- *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.*

N/A

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

N/A

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

N/A

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

N/A

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

N/A



The Waterloo/Cedar Falls HOME Consortium- HOME Investment Partnerships- American Rescue Plan Program HOME-ARP Funds, Section 3205 of the American Rescue Plan Act of 2021, Public Law 117-2

Notice of Public Comment Period:
February 18, 2023- March 4, 2023

And

Notice of Public Hearing March 6, 2023

In accordance with the federal regulations, 24 CFR, Part 91, NOTICE is hereby given to residents of the City of Waterloo that a draft version of the Waterloo/Cedar Falls HOME Consortium, HOME- American Rescue Plan (HOME-ARP) Allocation Plan will be available for review and a 15-day comment period. A public hearing will be held on March 6, 2023.

The City of Waterloo Community Development Department through the Waterloo/Cedar Falls HOME Consortium was awarded \$1,780,793.00 in HOME-ARP funds in a one-time allocation from the U.S. Department of Housing and Urban Development.

Funding will be allocated to the following activities:

Provisions of Supportive Services- funding will be used as listed in section 401(29) of the McKinney-Vento Homeless Assistance Act (“McKinney-Vento Supportive Services”) (42 U.S.C 11360(29)) in the amount of \$822,371.

Development and Support of Affordable Housing- funding will be used to acquire, rehabilitate, or construct affordable rental housing primarily for occupancy by households of individuals and families that meet one or more of the HOME-ARP qualifying populations in the amount of \$470,652.

Acquisition and Development of Non-Congregate Shelter- funds will be used to acquire and develop HOME-ARP non congregate shelter for individuals and families in qualifying populations in the amount of \$220,652.

HOME-ARP Administration- funding will be used to administer the HOME-ARP Program- \$267,118

The HOME-ARP allocation plan is required by HUD for the City to receive federal HOME-ARP grant funds. The HOME-ARP Allocation Plan is a strategic plan detailing the allocation of funding to assist individuals or households who are experiencing homelessness, at risk of homelessness, and other vulnerable populations, by providing affordable housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability. The plan defines the use of federal HOME-ARP grant funds to address these needs.

To encourage public input in the review process; a public hearing will be held on March 6, 2023 at 5:30 p.m. in the Harold E Getty City Council Chambers, 2nd Floor City Hall, 715 Mulberry Street, Waterloo, Iowa.

15-Day Comment Period: Citizens will have the opportunity to review and comment on the Waterloo/Cedar Falls HOME Consortium, HOME Investment Partnerships- American Rescue Plan Allocation Plan beginning February 18, 2023 until March 4, 2023.

Citizens may review the Allocation Plan on the City of Waterloo website at the following link www.CityofWaterlooIowa.com/dev or request a copy from the Community Development Department.

Public comments regarding the HOME-ARP Allocation Plan may be emailed to anita.merfeld@waterloo-ia.org or mailed to Community Development, 620 Mulberry Street, Waterloo, Iowa 50703. A summary of all citizen comments will be included in the allocation plan.

Disability Assistance: The City of Waterloo Community Development office will make efforts to provide reasonable accommodations to disabled members of the public in accessing the information for the HOME-ARP Allocation Plan. If you have special needs please call the Community Development office at 319-291-4429.

Translation Assistance: The City of Waterloo Community Development office will make efforts to provide translation assistance for public meetings and program information. Please call the Community Development office at 319-291-4429 if translation services are needed.

Copies of the draft HOME-ARP Allocation Plan will be distributed to partner entities that serve significant populations which include persons in legally protected classes (racial/ethnic minority, persons with disabilities, etc.), persons in special population (at-risk youth), persons in a federal “Presumed Benefit” category (abused spouses, persons with AIDS/HIV, persons experiencing homelessness or persons who may otherwise have barriers to public participation).