

Housing Best Practices with COVID Relief Funds

September 13, 2022





AFFORDABLE HOUSING CATALYST PROGRAM

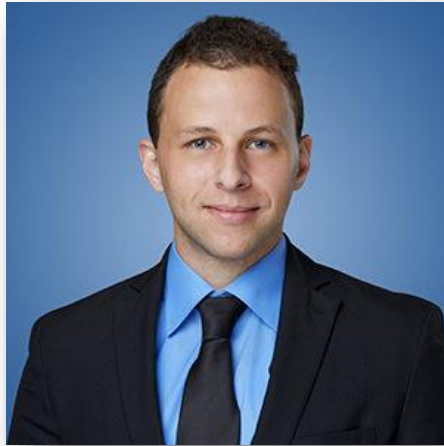
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FHC Presenters



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Amanda Wander,
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Guest Speakers

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Webinar Logistics

- All participants are on mute
- Please type in your questions and comments into the question box on the side panel
- We will not identify who has asked a question
- Webinar is recorded
- PPT is provided as a handout
- For follow-up information or problems downloading handouts, please contact glazer@flhousing.org



Funding sources covered

- Coronavirus State & Local Fiscal Recovery Fund (SLFRF)
- HOME-ARP
- Treasury's Emergency Rental Assistance Program (ERAP)





Coronavirus State & Local Fiscal Recovery Funds (SLFRF)



American Rescue Plan – Coronavirus State & Local Fiscal Recovery Fund (SLFRF)

- All counties and 77 larger cities in Florida received SLFRF dollars directly from U.S. Treasury
- 335 smaller cities & towns may apply to FL Division of Emergency Management
- If your community refers to the “ARPA dollars” or “American Rescue Plan funds,” this is probably the program being referred to
- Treasury issued its Final Rule providing good clarity on affordable housing uses that went into effect on April 1
- Bottom line: this program provides a once-in-a-generation opportunity to address the affordable housing crisis



How much \$\$\$ are we talking about?

Broward County \$379.3 million	Collier County \$74.7 million	Duval County \$186 million	Hialeah \$66.8 million	Leon County \$57.0 million
Ocala \$12.2 million	Kissimmee \$18.0 million	Flagler County \$22.4 million	Miami-Dade County \$527.7 million	Sarasota County \$84.2 million
Lee County \$149.6 million	Osceola County \$72.9 million	Coral Springs \$20.0 million	Port St. Lucie \$24.7 million	Tampa \$80.3 million



The Opportunity

- For some communities, these ARPA dollars provide **10-86 times more** than what they would receive annually through SHIP or HUD funding (CDBG+HOME+ESG)

Local Government	Estimated State & Federal Housing Funding 22/23	ARPA SLFRF Allocation	Difference
Flagler County	\$258,926	\$22.3 million	86x
Broward County	\$11.8 million	\$379.3 million	32x
Charlotte County	\$1.6 million	\$36.3 million	22.5x
Miami-Dade County	\$30 million	\$527.7 million	17x
St. Johns County	\$3.7 million	\$51.4 million	14x
Panama City	\$737,967	\$10.0 million	13x
Fort Pierce	\$1.0 million	\$13.5 million	13x
Gainesville	\$3.1 million	\$32.4 million	10x
Orlando	\$6.9 million	\$58.0 million	8x



Eligible Uses & Timelines under SLFRF

- General categories:
 - Replace lost public sector revenue
 - Respond to public health and negative economic impacts of COVID-19
 - Provide premium pay for essential workers
 - Invest in water, sewer, and broadband infrastructure
- Local governments received first half of total allocation in mid-2021 and second allocation in Summer 2022
 - **Why is this important?** There are local governments still planning their SLFRF expenditures.
- Funds must be obligated by 12/31/24 & expended by 12/31/26



Eligible affordable housing uses include:

Construction costs (new construction, rehab, renovation)

Land acquisition

Down payment assistance

Environmental remediation

Rent and mortgage assistance

Housing vouchers and relocation assistance

Supportive housing services to improve access to housing for individuals who are homeless

Housing counseling & legal aid

Demolition or deconstruction of vacant or abandoned buildings as part of neighborhood revitalization strategy

Conversion of vacant or abandoned properties into affordable housing

Inspection fees

Title clearing

Preservation & weatherization

Gap financing

Operating support to a nonprofit or other impacted business



Ineligible uses

- **No debt service.** SLFRF cannot be used to pay principal or interest on outstanding debt instruments.
- **No contributions to a reserve fund.** SLFRF cannot be used to replenish financial reserves which could include a local affordable housing trust fund.
- **No offsetting a reduction in net tax revenue.** A local government cannot cut taxes and then use SLFRF to fill the gap.
- **No satisfaction of settlements and judgements.**
- **No deposit into a pension fund.**
- **No project that conflicts with the purpose of the American Rescue Plan.**



Presumptive Eligibility #1 – In line with existing programs

- 1. An affordable housing project is presumptively eligible if it meets certain core requirements of a listed federal program:

Core Requirements
1. Resident income restrictions
2. The affordability period and related covenant requirements for assisted units
3. Tenant protections; and
4. Housing quality standards

Federal Programs	
National Housing Trust Fund (NHTF)	HOME Investment Partnership Program (HOME)
Low-Income Housing Tax Credit (LIHTC)	Public Housing Capital Fund
Section 202 Supportive Housing for the Elderly Program	Section 811 Supportive Housing for Persons with Disabilities Program
Project-Based Rental Assistance	Multifamily Preservation & Revitalization Program



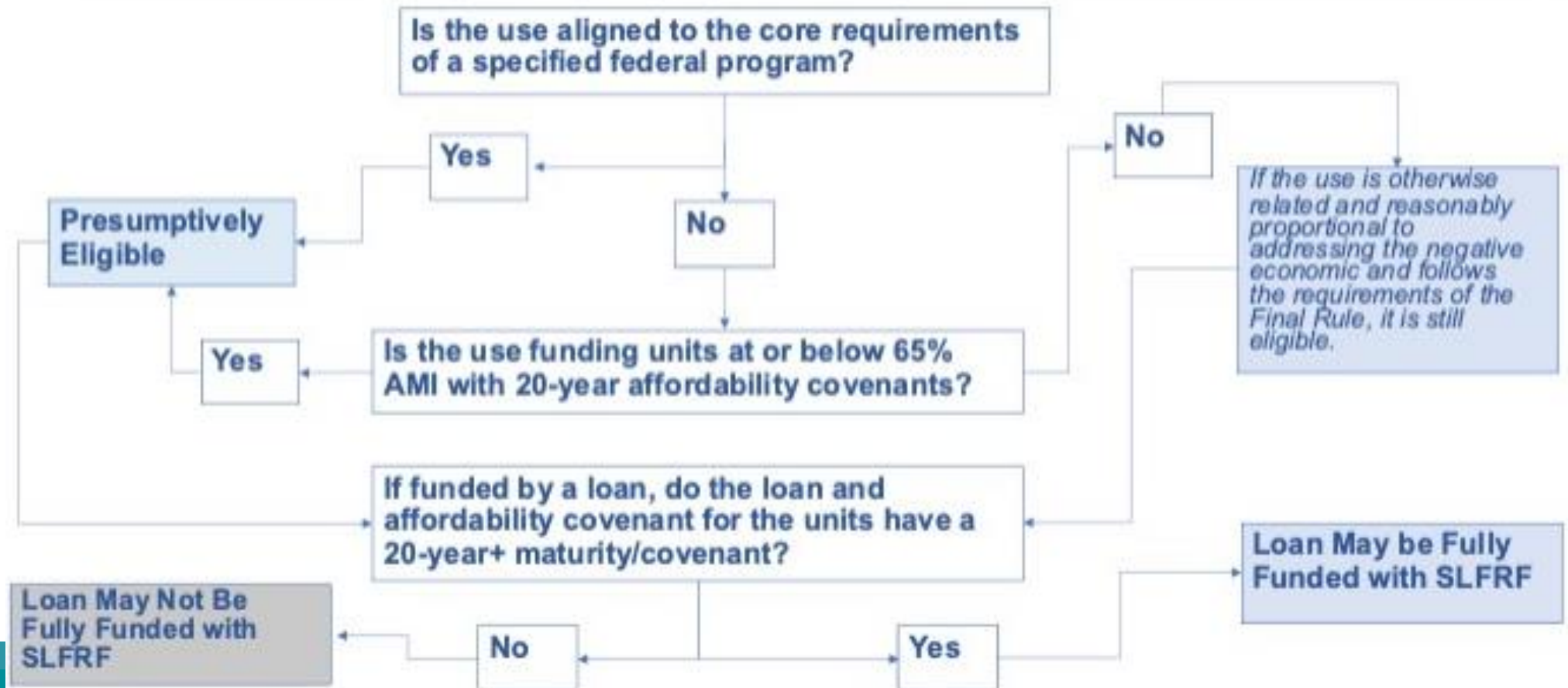
Presumptive Eligibility #2 – Income served & affordability period

- SLFRF funds used for affordable rental housing are presumed eligible if:
 - Units serve households at or below 65% AMI;
 - For a period of 20 years or greater



Eligibility for SLFRF – from Treasury “Affordable Housing How-To Guide” (see handouts)

Eligibility of Development, Repair, and Operation of Affordable Housing Under the Final Rule



More project and income eligibility

- A SLFRF-use is eligible depending on if it serves a household or population that was either “**impacted**” or “**disproportionately impacted**” by COVID-19

Household/population must be “disproportionally impacted” by COVID	Household/population must only be “impacted” by COVID
Housing vouchers	Emergency housing assistance (rental, mortgage, utility, property tax assistance)
Relocation services	Counseling & legal aid to prevent eviction
Improvements to <u>vacant and abandoned properties</u>	Homeless services including transitional housing & emergency funding
	Home repair & weatherization
	Development of affordable housing
	Development of permanent supportive housing



Presumed eligibility for “**impacted**” households and communities

- Up to moderate-income households (<300% of federal poverty guidelines or 65% AMI) & households eligible for certain federal programs
- Households considered “impacted” are eligible for most SLFRF-eligible affordable housing uses
- This does not apply to housing vouchers, relocation assistance, and improving vacant and abandoned properties (the exceptions!)

300% of 2022 Federal Poverty Guidelines	
Household Size	Annual Income Limit
1	\$40,770
2	\$54,930
3	\$69,090
4	\$83,250
5	\$97,410
6	\$111,570



Presumed eligibility for “disproportionally impacted” households and communities

- Low-income households (<185% of federal poverty guidelines or 40% AMI) & households eligible for certain federal programs
- This only applies to housing vouchers, relocation assistance, and improving vacant and abandoned properties (the exceptions!)

185% of 2022 Federal Poverty Guidelines	
Household Size	Annual Income Limit
1	\$23,828
2	\$32,227
3	\$40,626
4	\$49,025
5	\$57,424
6	\$65,823



If not presumed eligible . . .

- Treasury has released guidance titled “Framework for Eligible Uses Beyond those Enumerated” to help identify eligible households
- Guidance can be found at the link below and Treasury’s website for the Coronavirus State and Local Fiscal Recovery Fund

<https://home.treasury.gov/system/files/136/SLFRF-Final-Rule-Overview.pdf>



Recap: Eligible Affordable Housing Uses & Income Eligibility

- There are many eligible affordable housing uses – this is an extremely flexible program
- Check presumed eligibility
- Income eligibility depends on the use
- Most affordable housing activities can serve households and populations “impacted” by the pandemic (up to moderate-income as defined by Treasury)
- Only housing vouchers, relocation assistance, and improvements to vacant and abandoned structures can only serve “disproportionally impacted” households and populations



Terms of assistance

- **Grant, loan, or in-kind assistance.** SLFRF can be used as a grant, loan, or for in-kind assistance
- **Grants are ideal.** Structuring assistance as a grant is easier than a loan based on several factors, including expenditure deadlines
- **Long-term loans are allowed but with caveats.** Treasury has released in-depth guidance for how to treat loans (more on this later)
- **Affordability periods.** No required affordability period under federal rule; **best practice** – devote these funds for permanently affordable housing
- **Set-asides.** No required set-asides due to presumed eligibility requirements or justification that development, as a whole, serves impacted populations
- **Monitoring.** A Land Use Restriction Agreement (LURA) is not explicitly required by rule, but local governments should strive for one to ensure long-term affordability



Long-Term Loans for Affordable Housing

- July 2022 – Treasury provided a great update to its guidance on structuring loans for affordable housing
- SLFRF can fund the full principal amount of the loan if:
 - 1) The loan has a term of not less than 20 years;
 - 2) Affordability period of 20 years or longer; and
 - 3) Project owners which also receive LIHTC funding must agree to waive their right to request a Qualified Contract
- For short-term down-payment assistance or other loans that do not meet this standard, see Treasury guidance on how to structure loans that mature after 12/31/26.



Prioritizing SLFRF dollars

- Ideal funding source for the **development** of affordable housing
- Prioritize investments that will be affordable long-term
- Other priorities could include:
 - Ongoing rental subsidies
 - Legal aid + right to counsel programs
 - Down-payment assistance
- If used for ongoing rental subsidies, ensure adequate tenant protections



Forming local program funding plans & guidelines

- For ease of administration, a local government can decide to only fund projects or individuals that are presumed to be eligible under Treasury guidelines.
 - Ex) projects that meet the core requirements of a listed federal housing program like HOME, NHTF, or LIHTC or serve 65% or below AMI w/an affordability period of 20+ years
 - Ex) for households presumed “impacted” by COVID
- Considerations will include:
 - **Eligible activities & funding goals.** Development, rent assistance, legal services, etc. . .
 - **Eligible households.**
 - **Term of assistance.** Length of affordability, loan/grant, penalties, etc. . .
 - **RFP Process.**



Example: SLFRF-funded rent assistance or housing vouchers

- **Check Treasury’s guidance on eligibility.**
 - For housing vouchers, household must be “disproportionally impacted” by COVID unless in line with a stated federal program. For rent assistance, must only be “impacted.”
- **Terms of assistance:** Grant.
- **Eligible costs.** Including:
 - Ongoing rent subsidies
 - First & last months’ rent + security deposit
 - Move-in expenses



Structuring a SLFRF Down-Payment Assistance Program

- How to think through structuring a SLFRF-funded DPA program:
 - **Allow only projects presumed eligible?** DPA program modeled under HOME or CDBG is presumed eligible use of SLFRF.
 - **Expand to include other “impacted” households?** If not modeled on HOME/CDBG, can serve households up to moderate-income as defined by Treasury or households presumed to be “impacted”.
 - **If not presumed eligible...** DPA program can still serve a household that can demonstrate an impact due to COVID
- **Terms of assistance:** ideally structured as a grant but can be a fully forgivable, deferred, zero-interest loan or loan of 20 years+
 - If a loan term of less than 20 years, consult Treasury guidance on loans that mature after 12/31/26



Structuring SLFRF for development of affordable housing

- **Check Treasury's guidance on eligibility.**
 - Presumed eligibility (meets stated federal program guidelines or serves 65% AMI or below and affordability for 20+ years)
 - Showing eligibility if not presumed eligible (ex - serving “impacted” households)
- **Terms of assistance.** Grant or loan (for long-term loan, see Treasury guidance)
- **Eligible costs.** Including:
 - Land acquisition
 - Pre-development and site prep
 - Hard costs



SLFRF Affordable Housing Highlights in Florida

St. Petersburg - \$34 million (76%)

- \$6.5 million for an affordable townhome development
- \$2.5 million for scattered site family shelter
- \$1 million for supportive housing services
- \$20 million for development of affordable multi-family rental housing
- \$3.5 million for rental assistance

Orlando - \$39 million (67%)

- \$10 million for relocation and redevelopment of Women's and Children Facility into multi-family apartment
- \$4.1 million for hotel conversion into affordable housing
- \$4 million for land acquisition
- \$3.2 million for down-payment assistance & housing counseling
- \$2 million for single-family home development in Parramore
- \$1 million for home repair assistance to low-income homeowners
- \$4 million for rent assistance & supportive services
- \$9.2 million for permanent supportive housing, special needs, and housing LGBTQ youth



SLFRF Affordable Housing Highlights in Florida

- Sarasota County– \$25 million (30%)
 - 8 projects selected for funding, supporting the development or acquisition of approx. 706 units for wide array of households (30% to 80% AMI)
- Palm Beach County - \$60 million (20%) to “Increase retention and supply of affordable and workforce housing” through construction, gap financing, and down payment and home repair assistance
- Manatee County - \$19 million (24%) for repurposing an old county jail into transitional housing & service center for homeless veterans
- Collier County - \$11.6 million (15%) \$7 million for rent/mortgage assistance, \$4.1 million for development



SLFRF Affordable Housing Highlights in Florida

- Seminole County - \$6.25 million (7%) for affordable housing development through a community land trust, rent assistance, homeless prevention
- Volusia County - \$6.5 million (6%) for home repair, public housing development/rehab
- Clearwater - \$3.3 million (14%) for down-payment assistance, development, energy efficient improvements
- Jacksonville - \$4 million (2.5%) in operating support for two local affordable housing organizations
- Alachua County - \$6 million (11%) for affordable housing development & energy efficient upgrades
- Leon County - \$3.4 million (6%) to enhance homelessness support infrastructure



SLFRF Local Spotlight

Steve Hyatt,
Sarasota County
Program Manager, ARPA SLFRF Program
shyatt@scgov.net





Sarasota County ———

American Rescue Plan Act (ARPA)

State and Local Fiscal Recovery Funds (SLFRF)

Presented by

Steve Hyatt, MBA

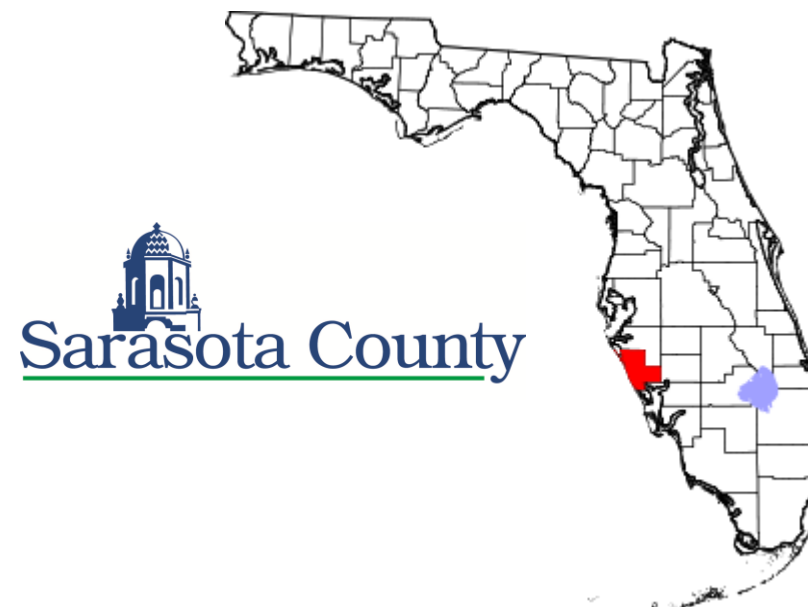
ARPA SLFRF Program Manager
Sarasota County Government



Sarasota County
**American Rescue
Plan Act (ARPA)**
State and Local Fiscal Recovery Funds (SLFRF)

Sarasota County Overview:

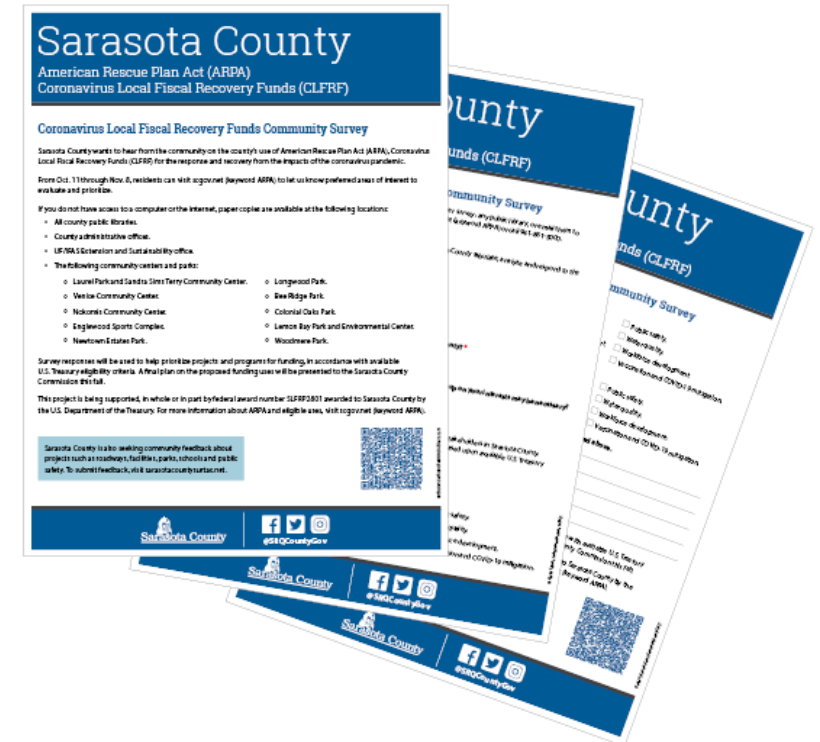
- Population: 441,500
- Median Age: 57.3 Years
- Average Household Size: 2.28
- Average Monthly Rent:
 - 1 bedroom \$1,500
 - 2 bedroom \$2,100





Affordable Housing Projects:

- Community Engagement – “Affordable Housing” was #1 issue on citizen surveying efforts.
- Determining Projects – No RFP process; Facilitated through the [Gulf Coast Community Foundation](#) with project proposals adhering to Treasury requirements submitted to Board of County Commissioners for approval.





Sarasota County American Rescue Plan Act (ARPA)

State and Local Fiscal Recovery Funds (SLFRF)



Funding Decisions and Projects:

- On March 29, 2022, the Sarasota County Board of County Commissioners distributed \$25 million of \$84.2 million of its ARPA SLFRF funds to affordable housing.
 - Allocating (30%) of total funds to (6) housing organizations (non-profits and PHA).
 - Supporting (8) affordable housing projects (acquisition and construction) for (746) rental units, majority \leq 80% AMI.
 - Minimum affordability period of 30 years, enforced by LURA or Restrictive Covenant.
 - Includes LIHTC and HOME-ARP projects and half (4) of projects located in HUD QCT areas.

ARPA SLFRF - Sarasota County Affordable Housing Projects

Agency	Project Name	Project Description	Targeted Beneficiaries	# of Units	ARPA SLFRF Funds Allocated	Other Federal Program Funds	Anticipated Affordability Period
Atlantic Housing Foundation	The Waters at North Port	Development of a (288) unit affordable rental housing which consists of one, two, and three bedroom units in three story walk up buildings. Site augmented with club house, pool, playground areas, dog park, and picnic / seating areas.	Low-income persons, families, families with children, elderly and physically or mentally disabled persons with the goal of lessening neighborhood tensions, eliminating prejudice and combating community deterioration (50 - 80% AMI).	288	\$ 1,500,000	n/a	30 Years
Community Assisted Supportive Living (CASL)	New Trail Plaza	Development of county surplus lands, to include management offices, clubhouse, and commercial space with (101) units (1, 2, and 3 bedroom) and (5) single story homes (4 bedroom).	Families (30%, 60%, and 80% AMI); Youth aging out of foster care; Permanent supportive housing; Section 8.	106	\$ 4,200,000	LIHTC	50 Years
Family Promise of South Sarasota County	Parkside Cottages Expansion	Purchase of a 3 bedroom home that would be used for (2) units which will complete the final house acquisition on the Substation Road property which has (10) units previously purchased.	Workforce; Individuals and families (80% AMI and below).	2	\$ 500,000	n/a	30 Years
Harvest House	Home Again II	Purchasing existing leased and subleased units by the organization to make permanent affordable, (2) one-bedroom and (4) two-bedroom apartments.	Homeless / at risk individuals and families (60% AMI and below).	6	\$ 800,000	n/a	30 Years
Loveland Center, Inc.	The Villas at Loveland Village	Development of 7.5 acres of land adjacent to the Loveland Center and Loveland Village to include up to (130) units, comprised of one, two, three bedroom quads and duplexes.	Intellectual and Developmental Disabled (I/DD) Individuals and Senior Citizens (65% AMI and below).	130	\$ 5,000,000	TBD	30 Years
Sarasota Housing Authority (SHA)	Central Gardens	Development of vacant land, to include a (3) story building, with (30) units to include (30) two bedroom units.	Homeless / at risk individuals and families (30% AMI and below) and / or imminently homeless households (50% AMI and below).	30	\$ 3,000,000	HOME-ARP	30 Years
Sarasota Housing Authority (SHA)	Cypress Square Phase I (fka Amaryllis Park Place Phase II)	Development of (3) buildings and a clubhouse, with (84) units to include (18) one bedroom, (36) two bedroom, (24) three bedroom, and (6) four bedroom units.	Workforce; Individuals and families (30%, 60%, and 80% AMI) and Section 8.	84	\$ 3,000,000	LIHTC	50 Years
Sarasota Housing Authority (SHA)	Lofts on Lemon Phase II	Development of a high rise building with (100) units to include (20) one bedroom, (70) two bedroom, and (10) three bedroom units.	Workforce; Individuals and families (30%, 60%, and 80% AMI) and Section 8.	100	\$ 7,000,000	LIHTC	50 Years
				746	\$ 25,000,000		



Challenges:

1. Addressing framework for recipient-defined “Impacted” classes \geq 65% AMI.
2. Early absence of guidance (e.g. Davis-Bacon, Affordability Periods).
3. Pass-through of requirements (Subrecipient Agreement).
4. Compliance with “Core Requirements” (LIHTC, HOME, etc.).
5. Funding Means – Advance, loan, traditional reimbursement?
6. LIHTC projects and complexities – Multiple partners/investors, active construction.



Resolution:

1. Addressing framework for recipient-defined “Impacted” classes $\geq 65\%$ AMI.
 - Creation of form for awarded organizations to complete and county reviews / counter-executes.
 - Put in own words, with own data and sources, supporting how $\leq 80\%$ AMI should be an “Impacted” population in our community.

2. To qualify for services for your project, are your intended beneficiaries one or more of the following “impacted” populations, as defined by the U.S. Treasury? Check all that apply.

☐ Households defined as “Moderate Income”, $\leq 300\%$ Federal Poverty Guidelines (FPG).

☐ Households defined as “Moderate Income”, $\leq 65\%$ Area Median Income (AMI).

☐ Households who qualify under the following federal assistance programs (check all that apply):

☐ Children’s Health Insurance Program (CHIP)

☐ Childcare Subsidies through the Child Care and Development Fund (CCDF) Program

☐ Medicaid

☐ Household eligibility restrictions in accordance with the National Housing Trust Fund

☐ Household eligibility restrictions in accordance with the Home Investment Partnership Program (HOME)

Eligible Beneficiaries - Non Enumerated Populations:

3. To qualify for services for your project, are all your project’s intended beneficiaries “disproportionately impacted” and/or “impacted” populations, as defined by the U.S. Treasury?

☐ Yes ☐ No

If “Yes”, the remaining portions of this form are not applicable and no further justification is required. Please skip to certification section at the end and complete.

If “No”, you will be required to provide additional information and justification in accordance with Covid-19 Justification Section below.

Covid-19 Justification - Identifying Other Eligible Populations:

4. Please identify your population, households, class, geographic location, or other criteria that your project will be utilizing to qualify other, non-enumerated beneficiaries for assistance (be specific):

Subrecipient Certification:

By its authorized signatory below, the Subrecipient hereby certifies and attests to the accuracy of the above responses as it relates the intended beneficiaries of the proposed project of the Subrecipient.

Signature: _____

Printed Name : _____

Title: _____

Date: _____

Sarasota County Program Management Certification:

I, _____, representative of the Recipient and the Sarasota County ARPA CLFRF Program, hereby certifies that the information supplied by the Subrecipient has been reviewed for compliance with the U.S. Treasury’s Final Rule, *Populations Presumed Eligible and Standards for Identifying Other Eligible Populations*.

Signature: _____

Printed Name : _____

Title: _____

Date: _____

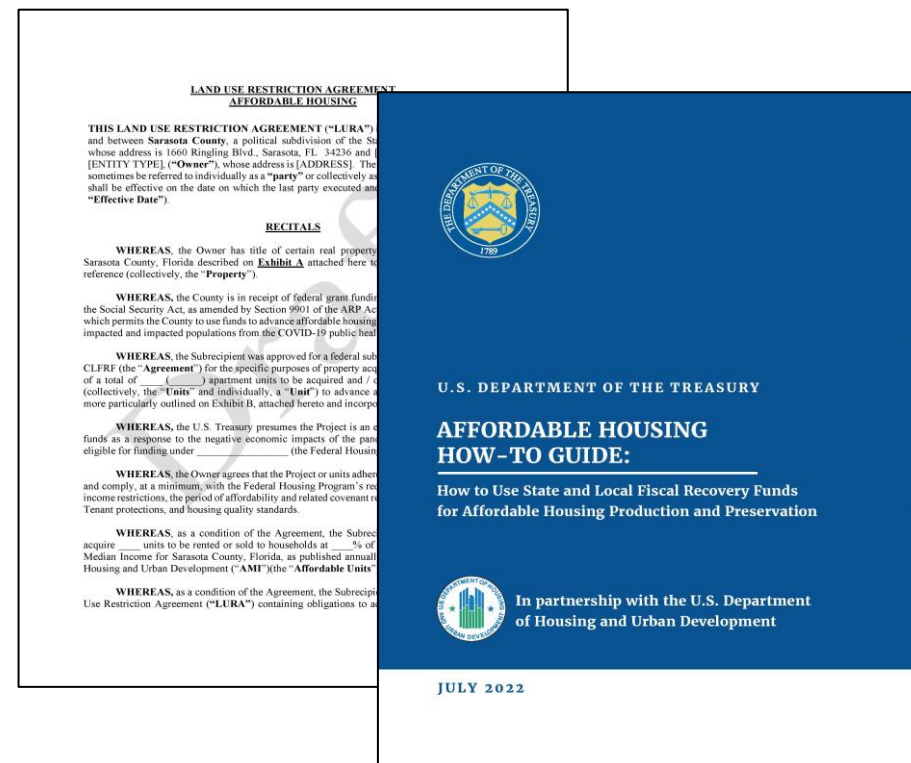


Sarasota County American Rescue Plan Act (ARPA)

State and Local Fiscal Recovery Funds (SLFRF)

Resolution (cont):

2. Early absence of guidance (e.g. Davis-Bacon, Affordability Period).
 - No requirements for Davis-Bacon, unless other federal funds – Treasury FAQ 6.15.
 - County policy direction on LURA for minimum 30 years – Treasury is 20 years, some projects are 50 years.
 - New U.S. Treasury guidance on affordable housing released July 27, 2022.





Sarasota County American Rescue Plan Act (ARPA)

State and Local Fiscal Recovery Funds (SLFRF)

FEDERAL SUBRECIPIENT AGREEMENT
between
Sarasota County, Florida and Community Assisted and Supported Living, Inc.
for a federal subaward of an amount not to exceed \$4,200,000.00
from a federal award issued by U.S. Department of the Treasury
for the specific purpose of
the development of New Trail Plaza for affordable housing
purposes for qualifying households.

SUBAWARD INFORMATION

INTERNAL TABLE – FOR COUNTY INTERNAL USE	
County Contract No.:	County Contract No.:
County Department/Division:	Office of Financial Services
ARPA Expenditure Category	2.15 – Long-Term Capital Assets

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Sarasota County
American Rescue Plan Act (ARPA)
State and Local Fiscal Recovery Funds (SLFRF)

New Trail Plaza

Federal Appropriation: American Rescue Plan Act
Federal Agency: U.S. Treasury
Federal Grant Name: Coronavirus State and Local Fiscal Recovery Funds
Federal Grant Award #: SLT-0607
Pass-through Recipient: Sarasota County Board of County Commissioners
Subrecipient: Community Assisted Supportive Living (CASL)
Subaward Contract #:
Funding Amount: \$4,200,000

This affordable housing development is funded in whole, or in part, by an award of U.S. Treasury American Rescue Plan Act (ARPA), Coronavirus State and Local Fiscal Recovery Funds (SLFRF) as authorized by the Sarasota County Board of County Commissioners.

A Sarasota County Commission Priority scgov.net/ARPA

Subrecipient Agreement – Coversheet
Sarasota County, Florida and Community Assisted and Supported Living, Inc.
FAIN: HR 1319, Title IX, Subtitle M, Section 9901
Page 1 of 1

Resolution (cont):

3. Pass-Through of Requirements

- Subrecipient agreement template and associated 2 CFR requirements and subrecipient certifications.
- Exhibits outlining funded project, scope of work, project owners, project signage, etc.
- Incorporating timeliness milestone of expenditure of funds to carefully monitor for approaching 12/31/26 expenditure timeframe.



Resolution (cont):

4. Compliance with “Core Requirements” (LIHTC, HOME, etc.) under new Treasury guidance.
 - 1) Resident income restrictions;
 - 2) The affordability period;
 - 3) Tenant protections; and
 - 4) Housing quality standards.
- County receipt, review, and retention of documentation required of other programs that demonstrate these “core requirements”.

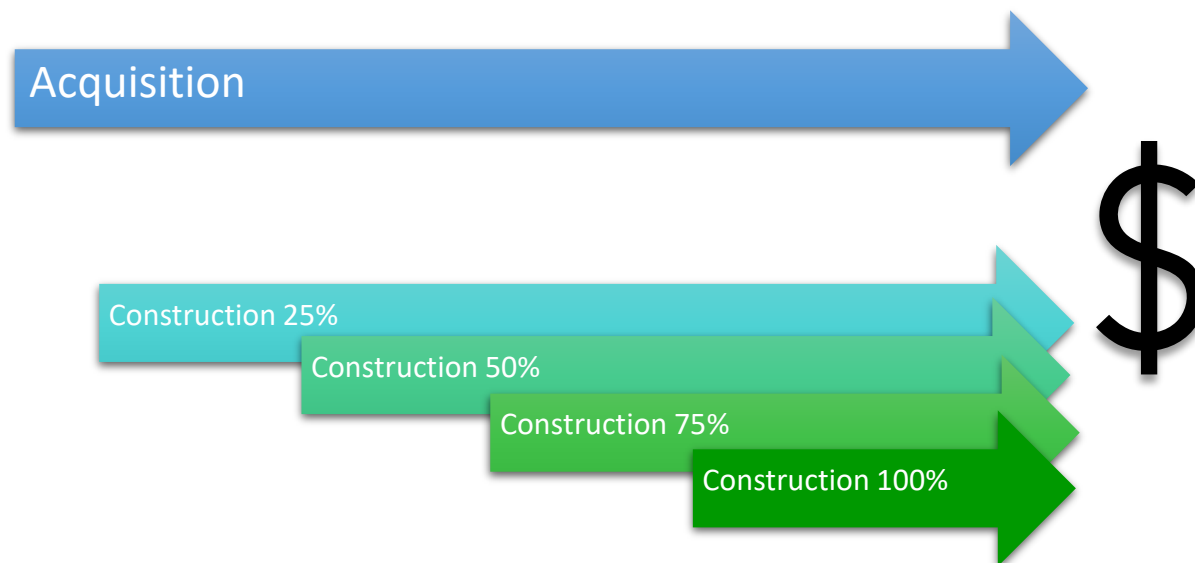
ARPA SLFRF "Core Requirements" LIHTC Program				
	Income Restrictions	Affordability Periods	Tenant Protections	Housing Quality
LIHTC Document or Ancillary Support Document				
<i>Approved LIHTC Application Package</i>	X	X	X	X
<i>Carryover Allocation Agreement</i>	X	X	X	X
<i>Credit Underwriting Report</i>	X	X	X	X
<i>Extended Use Agreement</i>	X	X	X	X
<i>Tenant Selection Plan (TSP)</i>	X		X	
<i>Operating Agreement</i>	X	X	X	X
<i>Management Agreement</i>	X		X	X
<i>Management Plan</i>	X		X	X
<i>Memorandum of Understanding for Special Needs Housing Services (Link MOU)</i>			X	X
<i>Annual Owner's Certificate (AOC) of Housing Credit Program Compliance (Form AOC-1)</i>	X	X	X	X

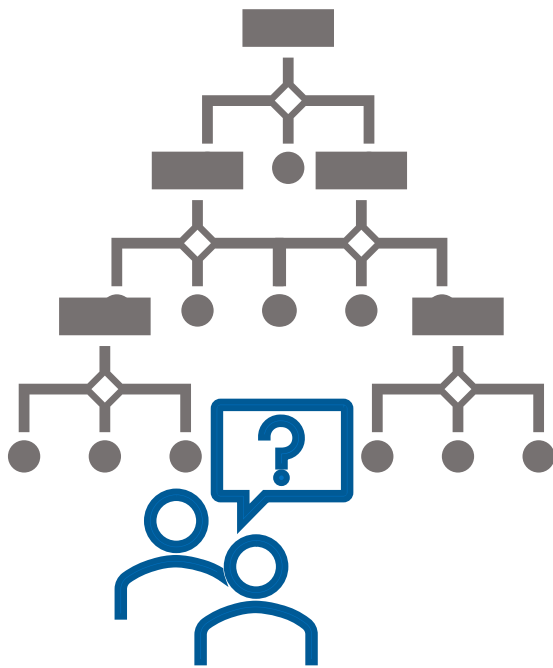


Resolution (cont):

5. Funding Means – Advance, loan, traditional reimbursement?

- Acquisitions will be funded at the time of closing through wire transfer.
- New construction will require reimbursement requests with supporting documentation proving necessary activities per funding milestone.





Resolution (cont):

6. LIHTC projects and complexities – Project owner, subrecipient, multiple partners/investors.

- Funding agreement is with the subrecipient with clear delineation of there being a separate “Project Owner”.
- Subrecipient ultimately responsible for ensuring compliance with federal award
- Agreement covers topics like the prohibition of duplicative funding, costs in excess of award and unauthorized expenditures
- Subrecipient (Project Owner) will submit required reporting, payment requests and assist in sub-award closeout



Sarasota County
**American Rescue
Plan Act (ARPA)**
State and Local Fiscal Recovery Funds (SLFRF)

Contact information:

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941-315-5187

scgov.net (keyword ARPA)

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HOME-ARP



HOME-ARP Brief Overview

- [The American Rescue Plan \(ARP\)](#) provides \$5 billion to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations
- Can provide housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability
- Grant funds will be administered through HUD's [HOME Investment Partnerships Program \(HOME\)](#).
- Budget period through 9/30/2030



HOME-ARP Funding in Florida

- **\$71,903,340.00** awarded to **Florida Housing Finance Corporation**
(State allocation)
- **\$179,676,633.00** awarded to **37 Florida local governments**
 - Awards range from \$1,088,181.00 to \$17,686,235.00
 - 14 Local Governments funded \$1 to \$3 million
 - 13 Local Governments funded \$3 to \$5 million
 - 4 Local Governments funded \$5 to \$10 million
 - 6 Local Governments funded over \$10 million

\$251,579,973 TOTAL HOME-ARP FUNDS FOR FLORIDA



HOME-ARP Activities



**DEVELOPMENT OF
AFFORDABLE HOUSING**



**TENANT-BASED RENTAL
ASSISTANCE (TBRA)**



**SUPPORTIVE
SERVICES**



**ACQUISITION &
DEVELOPMENT OF
NON-CONGREGATE
SHELTER**



**NON-PROFIT
CAPACITY BUILDING**



**NON-PROFIT
OPERATING**



**ADMINISTRATION &
PLANNING**



HOME-ARP Qualifying Populations

- **Homeless**, as defined in 24 CFR 91.5 Homeless (1), (2), or (3)
 1. Literally homeless,
 2. Immanent risk of homelessness, or
 3. Unaccompanied youth under 25 years old
- **At risk of Homelessness**, as defined in 24 CFR 91.5 At risk of homelessness
- Fleeing/Attempting to Flee, **Domestic Violence**, Dating Violence, Sexual Assault, Stalking, Human Trafficking, as defined by HUD.
- **Other Populations**
 - Other Families Requiring Services or Housing Assistance to Prevent Homelessness
 - At Greatest Risk of Housing Instability



HUD Approved HOME- ARP Allocation Plans

- State of Florida (FHFC)
- Hillsborough County
- Miami Dade
- Osceola
- Tallahassee

As HUD approves more plans for Florida, they will be available here:

[HOME-ARP Allocation Plans - Florida | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)



Approved Allocation Plans

How are PJs allocating these funds?

	FL/FHFC	Hillsborough	Miami Dade	Osceola	Tallahassee
Development Affordable Rentals	\$62.5 mil	\$1.8 mil	\$10 mil	\$1.8 mil	\$3 mil
TBRA	\$5 mil	\$3 mil	0	\$360 k	0
Support Services	0	0	0	\$544 k	\$350 k
Non-Congregate Shelter	0	\$4 mil	\$5 mil	0	0
Non-Profit Capacity Building	0	0	0	0	0
Non-Profit Operating	0	0	0	173.9 k	0
Admin. & Planning	\$4.4 mil	\$1.5 mil	\$2.6 mil	521.7 k	\$62.4 k
Total by PJ	\$71.9 mil	\$10.3 mil	\$17.6 mil	\$3.4 mil	\$3.4 mil

Draft Allocation Plans not yet approved by HUD

- 12 additional PJ have draft plans in various stages of being presented to and approved by HUD; Lakeland, Daytona Beach, Clearwater, Miami Beach, Ft. Lauderdale, Volusia County, Lee County, Pasco County, Orlando, Polk County, Hialeah, and Tampa
- 4 to fund Support Services
- 1 to fund Non-Congregate Shelter
- 2 to fund TBRA
- **All 12 are committing to the Development of Affordable Rental Housing**
- 4 to Non-Profit Capacity Building
- 4 to Non-Profit Operating

Upcoming webinar!

Tuesday, September 27
@10:00 am

HOME Funding for Affordable Housing Part 1

Registration:

<https://attendee.gotowebinar.com/register/9127591804561432845>

This webinar will speak to the effective use of HOME-ARP funds to support long-term solutions for decreasing homelessness and for providing housing stability to qualifying populations. This special allocation, resulting from the American Rescue Plan Act (ARPA), provides communities with a one-time opportunity to champion innovative affordable housing efforts. Learn how to use your HOME-ARP Allocation Plan to identify priority needs and how to properly leverage HOME-ARP funds. Presenters will also provide examples of creative affordable housing strategies to be considered for using HOME-ARP dollars.



HOME-ARP SPECIAL ALLOCATION PLANNING



“

Partnering with the Florida Housing Coalition (FHC) to develop your HOME-ARP Allocation Plan means investing in community-based planning that goes beyond regulatory compliance and shows commitment to reducing homelessness for vulnerable residents. The Coalition provides its partners with strategic plans that identify viable solutions and aligns goals community-wide.

”

Our team of experts can help determine how to effectively spend your HOME-ARP dollars for maximum community impact.

Services include:



Allocation Plan
Preparation



Regulatory
Compliance



Community
Engagement



Direct
Consultation



Funding
Advisement



Strategy
Implementation

For more information on partnering with the Coalition for your HOME-ARP Allocation Plan, contact Carter Burton at (407) 864-5424



Emergency Rental Assistance Programs



Emergency Rental Assistance Programs

- Since the pandemic began, local governments have used a variety of funding sources for ongoing rental assistance including:
 - Treasury Emergency Rental Assistance Program (ERAP) funding
 - SLFRF
 - HOME-ARP
 - CDBG-CV
 - ESG-CV
 - SHIP
 - Coronavirus Relief Funds (CRF)
 - General Revenue



Best practices for ongoing rental assistance

- **Prioritize the most vulnerable.** Be mindful of funding source limitations & local housing needs.
- **Take advantage of program flexibilities.** Including all eligible uses of funding, self-attestation, proxies for income, etc. . .
- **Meet people where they are.** Most successful programs include in-person outreach.
- **Partner with nonprofits.** Can help with outreach, program administration, and legal support.
- **Conduct culturally and linguistically competent outreach.** Expand access to those with limited English proficiency.
- **Provide direct-to-tenant assistance.** Helps avoid a situation where a landlord rejects funding.
- **Information share with local courts.** Prevent or delay evictions at the source.



Best practices for ongoing rental assistance

- **Avoid burdensome documentation requirements.** Only require what is necessary to process an application.
- **Include tenant protections.** When ERA funds provided, get landlord to promise withholding of eviction for x number of months.
- **Fund legal aid.** ERA funds can help support legal services attorneys & tenants' right to counsel programs.
- **Pass local source of income protections.** Make it unlawful for a housing provider to reject ERA funding.

See U.S. Treasury ERAP webpage for good national examples of emergency rent assistance best practices.



Treasury Emergency Rental Assistance Program (ERAP)

- 32 local governments in Florida received Treasury ERAP funds

	ERAP 1 (HR133 Dec 2020)	ERAP 2 (ARP Mar 2021)
Eligibility Requirements	<ul style="list-style-type: none">▪ Household has experienced financial hardship due to COVID-19 outbreak▪ Risk of experiencing homelessness or housing instability▪ At or less than 80% of area median income (AMI)	Household has experienced financial hardship during or due to COVID-19 outbreak Risk of experiencing homelessness or housing instability At or less than 80% of AMI
Direct to Tenant Assistance Provisions	<ul style="list-style-type: none">▪ Strongly encouraged to provide an option for tenants to apply directly, rather than only accepting applications for assistance from landlords and owners of dwellings▪ Must make reasonable efforts to obtain cooperation of landlords and utility providers to accept payments before providing assistance directly to eligible household	<ul style="list-style-type: none">▪ Required to allow tenants to apply directly for assistance, even if the landlord or owner chooses not to participate▪ Does not require cooperation of the landlord or utility provider before providing assistance directly to the tenant.
Term of Assistance	<ul style="list-style-type: none">▪ Up to 12 months + 3 months if necessary to ensure housing stability	<ul style="list-style-type: none">▪ Must not exceed 18 months, including receipt of ERAP 1 funds
Deadline	<ul style="list-style-type: none">▪ September 30, 2022	<ul style="list-style-type: none">▪ September 30, 2025



ERA 1 + ERA 2 Expenditures as of June 30, 2022

	ERA1	ERA2	Total
State of Florida (OUR Florida)	\$ 784,113,848	\$ 666,434,943	\$ 1,450,548,791
All Local Governments	\$ 478,022,452	\$ 220,665,387	\$ 698,687,839
Total	\$ 1,262,136,300	\$ 887,100,330	\$ 2,149,236,630



Using ERA 2 for new construction

- On July 27, the U.S. Treasury released updated guidance on how local governments can use ERA 2 funds for affordable housing construction, rehabilitation, or preservation starting October 1, 2022.
- Conditions:
 - Grantee must have obligated at least 75% of total ERA 2 funds for rent assistance + housing stability services + admin costs
 - Assisted units must serve very low-income families
 - Units must be affordable for at least 20 years
 - Use must align with at least one of the listed affordable housing programs (see handout for Treasury guidance)



More ERA 2 development criteria

- Funds must be obligated by September 30, 2025
- For mixed-income developments, ERA 2 award can only be used to assist VLI units
- Can be used for loans (including no-interest and deferred-payment loans), interest subsidies, grants, or other financial arrangements
- May not be used to support revolving loan funds

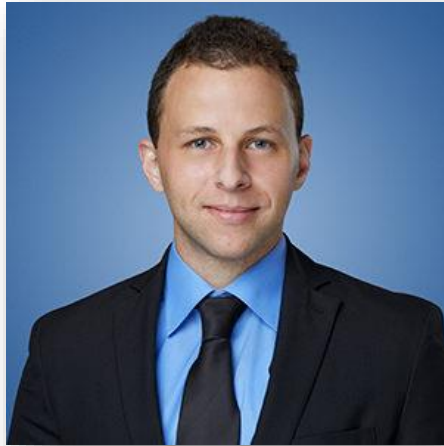


Emergency Rent Assistance Local Spotlight

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