

CITY OF BOSTON

**Substantial Amendment
To Program Year 2021 Action Plan
July 1, 2021 – June 30, 2022**

HOME-ARP Allocation Plan

**Posted August 1, 2022
for Public Comment**



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City of Boston
**Substantial Amendment
to Program Year 2021 Action Plan
HOME-ARP Allocation Plan (draft)**

Table of Contents

Pages	Section
1-11	Introduction, Consultation and Public Participation
11-26	Needs Assessment and Gap Analysis
26-29	Activities, Use of Funds and Production Goals
30-32	Preferences
33	Appendix A: Consultation Participants

Participating Jurisdiction (PJ): City of Boston

Date: August 1, 2022

Introduction

The American Rescue Plan (ARP) Act, which was the most recent federal relief package created to assist states, counties, and local governments address the negative economic effects of the Coronavirus pandemic, appropriated funds for the U.S. Department of Housing and Urban Development (HUD) to distribute under the HOME Investment Partnership Program (HOME) in Federal Fiscal Year 2021. The City of Boston received a total allocation of \$21,597,797 in HOME-ARP funds. The HOME-ARP program can be used to fund the following eligible activities: Rental housing development, tenant based rental assistance, supportive housing services, non-congregate shelter development, operating and capacity building expenses for non-profits undertaking HOME-ARP activities, and administration expenses related to implementing HOME-ARP funded programs. The allocation of these funds to specific projects requires that the City of Boston first post a draft Plan for public comment and submit the HOME-ARP Allocation Plan to the U.S. Department of Housing and Urban Development (HUD).

Text *in blue* in this document are instructions from HUD that are included to provide context to the reader.

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

Summarize the consultation process:

Before developing its HOME-ARP Allocation Plan, the City of Boston Mayor's Office of Housing (MOH), consulted with a diverse group of organizations serving the qualifying populations. MOH is the designated Collaborative Applicant for the Boston Continuum of Care as well as the recipient of Boston's annual allocations of funding from these federal programs: Emergency Solution Grant (ESG), Community Development Block (CDBG), Home Investment Partnerships (HOME) and Housing Options for Persons with AIDS (HOPWA). The consultations included an overview of the HOME-ARP program parameters, projected timelines for preparing a draft Allocation Plan and Homeless Management Information System (HMIS) recent homeless data.

City of Boston, Mayor’s Office of Housing, HOME-ARP Allocation Plan (DRAFT)

As part of the consultation process, MOH conducted seven (7) virtual roundtable discussions that focused on one or more of the qualifying populations. The purpose of the roundtables was to obtain input into the development of the Allocation Plan from agencies and service providers serving the qualified populations (QPs) within the City of Boston who could identify unmet needs and gaps in housing or service delivery systems. Specific feedback is included in the consultation table starting on page 4. Many of the participants in the roundtable discussions urged the city to invest the HOME-ARP funds to create more deeply affordable units that offer supportive services to keep individuals/families stably housed.

MOH also consulted with the Boston Continuum of Care membership, Boston’s public housing authority, and Metro Housing|Boston (a regional housing voucher agency). In addition, MOH consulted with the Affirmatively Furthering Fair Housing Community Advisory Committee, made up of a number of organizations that also advised MOH on the Assessment of Fair Housing, and continues to play a role in the implementation of that Assessment. The table (page 4) captures details of the roundtable discussions and meetings with key stakeholders. All of the feedback and input was considered in the drafting of this Allocation Plan.

See Appendix A for a list of consultation participants.

City of Boston, Mayor’s Office of Housing, HOME-ARP Allocation Plan (DRAFT)

List of Consultations. Summarize feedback received

Summary of Consultations			
Qualifying Population	Type of Organization / Agency	Date	Feedback
Homeless	Nonprofits serving QPs	4/4/22 Virtual Roundtable	Homeless counts are not accurate, as some groups are undercounted such as women and families doubled up Allocate funds for supportive services to keep people stably housed and track progress Create incentives to collaborate (ex. housing, education and health) that will reduce homelessness and improve other outcomes. More Vouchers needed, deeply affordable
Unsheltered	Nonprofits serving QPs	4/4/22 Virtual Roundtable	Allocate funds for supportive services to keep people stably housed. Housing search help needed, difficult to navigate on its own and easy to get discouraged. Coordinate services, like the housing surge model so one person does not have to go to multiple agencies to receive help. Sanitary facilities (bathrooms and showers) are needed, especially after 5:00 pm.
Persons with Disabilities	City of Boston, Disabilities Commission;	4/6/22	Need more affordable, accessible, adaptable and available units.

City of Boston, Mayor’s Office of Housing, HOME-ARP Allocation Plan (DRAFT)

	non-profit providing free legal assistance; non-profit providing services to people with disabilities	Virtual Roundtable	Supportive services are key to housing stability but must be resident’s choice not a requirement of the housing Consideration of vertical access must be in design plans for full accessibility (COPD & diabetes); majority of those with a disability are not in a wheelchair. Shelters are not always suitable for those with disabilities with other health concerns.
Veterans	Nonprofits Serving QPs	4/5/22 Virtual Roundtable	Homeless female Veterans are undercounted as they are doubled up and not in shelters. Allocate funds for supportive services to keep people stably housed.
Elderly	Nonprofits Serving QPs Non-profit providing free legal assistance	4/6/22 Virtual Roundtable	Set rents at 30 percent of income to truly be affordable. Allocate funds for supportive services to keep people stably housed (ex. hoarding issues) Need a specialized shelter for older adults who fear going to regular shelter. Allocate resources to preventing elder homelessness as elders tend to end up in expensive nursing homes and emergency rooms.
Continuum of Care (CoC)	Public and private organizations addressing the needs of QPs	4/06/22 Virtual Roundtable	Housing search help needed, avoid passing people around Allocate funds for supportive services to keep people stably housed

City of Boston, Mayor’s Office of Housing, HOME-ARP Allocation Plan (DRAFT)

<p>Boston Housing Authority (BHA)</p>	<p>Public Housing Agency</p>	<p>4/7/2022 Virtual Roundtable</p>	<p>Use funds to extend subsidies for those currently in rapid rehousing.</p> <p>As with the City funded vouchers, vouchers holders should be allowed to continue to have homelessness priority for federal, long-term subsidies.</p> <p>Provide support services for existing PSH residents to assure stability.</p> <p>Provide “next level” of low-barrier, transitional housing for those that had been in encampments.</p> <p>Increase supply of permanent supportive housing, combining Faircloth subsidies to make HOME-ARP dollars go further.</p>
<p>Metro Housing Boston</p>	<p>Regional Non-Profit Voucher Issuing Authority</p>	<p>4/7/2022 Virtual Roundtable</p>	<p>Need more units for voucher holders</p> <p>Allocate funds for supportive services to keep people stably housed (ex. chronically homeless)</p> <p>Housing search help needed, especially to overcome barriers such as CORI</p>
<p>Affirmatively Furthering Fair Housing Community Advisory Committee</p>	<p>Nonprofits addressing civil rights and fair housing</p>	<p>4/14/2022 Virtual Roundtable</p>	<p>Support the creation of additional permanent supportive housing units, through purchase of existing units or new construction. .</p> <p>Support land trusts to purchase and income restrict existing housing.</p> <p>Assure that those in PSH units have services needed.</p>

City of Boston, Mayor’s Office of Housing, HOME-ARP Allocation Plan (DRAFT)

			<p>Use funds to help homeowners and/or heirs so as to preserve wealth for low-income and BIPOC homeowners.</p> <p>Create permanent affordability on any units funded (Community Land Trust as one option)</p>
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Public Participation

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

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

- *The amount of HOME-ARP the PJ will receive,*
- *The range of activities the PJ may undertake.*

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

- ***Public comment period: August 1, 2022 to August 18, 2022***
- ***Public hearings: March 16, 2022 and April 27, 2022***

MOH held two citywide virtual public hearings on the HOME-ARP Allocation Plan. The first hearing was held on March 16, 2022, and the second hearing was held on April 27, 2022. Both hearings were held in conjunction with Boston’s annual hearings on the HUD Action Plan. All advertisements and outreach clearly spelled out that both the Action Plan and the HOME-ARP Allocation Plan would be discussed at the hearings. Both meetings were held virtually on Zoom, and interpretations were made available in Spanish, Mandarin, and Cantonese. Attendees could also request interpretation in additional languages.

Describe any efforts to broaden public participation:

The City of Boston, Mayor’s Office of Housing (MOH) created a new link on our webpage under the section ***“HUD Plans and Reports”*** with information about the HOME-ARP grant such as eligible uses, the amount of Boston’s award, a link to HUD Notice CPD-21-10: Requirements

City of Boston, Mayor's Office of Housing, HOME-ARP Allocation Plan (DRAFT)

for the Use of Funds in the HOME-ARP Program), and a link to sign up for MOH's policy news emails to keep informed about the HOME-ARP Allocation Plan and opportunities for input.

<https://www.boston.gov/departments/housing/policy-development-and-research>

Other outreach to broaden public participation: MOH has developed an extensive listserv of 634 subscribers focused on policy matters that includes a range of organizations and stakeholders who may have an interest in the City's HUD funding. The public may also sign up for this list on the Mayor's Office of Housing website. This listserv is consistently used for the annual HUD Action Plan hearings, but for the purposes of this hearing, the list was further augmented to assure that agencies and individuals who are part of the required consultation process were also on the email list. Those listservs included: Disabilities Commission, 50 agencies; Continuum of Care, 292 members; and Age Strong/Elderly Commission, 23 agencies

Notice of the meetings also was sent out through the 17 neighborhood newsletters (a total of 17,310 subscribers) across Boston managed by the Office of Neighborhood Services.

To assure that there was sufficient outreach to the public, the hearings were advertised both through the Mayor's Office of Housing (MOH) website, MOH newsletters, the MOH policy email list, and through advertisements in a range of newspapers, including in English, Spanish, and Chinese.

In addition, as spelled out in the Consultation Process section above, the City of Boston held a series of meetings and focus groups to understand the current needs of the qualified populations, in particular those who have experienced homeless or are at risk of homelessness. For stakeholders not able to attend one of the seven roundtables, MOH created an **online survey** to help identify the biggest priorities and gaps in Boston's housing and services landscape and how best to prioritize the HOME-ARP funds. The survey was linked to the roundtable invitation and 18 organizations responded.

This draft is available for review by the public through the MOH website at <https://www.boston.gov/departments/housing> and is being circulated to all invitees and attendees of the consultation meetings.

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

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

Consultation Comments:

Please see the table (pages 5-8) for details from each consultation. In summary, there was great interest in the creation of additional units of permanent supportive housing, a need to provide tenant based rental subsidies (largely to extend rapid rehousing subsidies), provide more housing search services, and provide more services that will help qualifying populations remain stably housed.

Online Survey Results:

With respect to eligible HOME-ARP uses, developing affordable housing and providing rental assistance were ranked as the highest priority. The lowest priority was acquisition/development. Several respondents commented that more affordable housing options were needed with rents set to 30 percent of area median income and to increase Boston's homeless set-aside policy (currently 10 percent of the housing units in City-funded developments with ten or more units).

With respect to unmet housing and service needs among Qualifying Populations, a common thread amongst survey respondents is the lack of affordable housing with rents set at 30 percent of a household's income, the need for services to support individuals and families with housing and services to remain stably housed, the lack of units designated for seniors and for people with disabilities and the importance of siting affordable housing close to essential services, employment opportunities and conveniences such as transportation.

This draft of the HOME-ARP Allocation Plan is posted for the HUD required minimum 15-day comment period from August 1st to August 18th. Comments received on the draft plan will be summarized here before formally submitting the Plan to HUD for review.

<https://www.boston.gov/departments/housing/hearings-and-public-comment>

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

During the consultation process, several suggestions were made that are outside the scope of HOME-ARP, namely:

- *Sanitary facilities (bathrooms and showers) are needed, especially after 5:00 pm.*
HOME-ARP is not intended to fund congregate shelter or street services. This suggestion

City of Boston, Mayor's Office of Housing, HOME-ARP Allocation Plan (DRAFT)

is being taken under consideration as we address the unhoused and unsheltered with other resources.

- *Shelters are not always suitable for those with disabilities with health concerns.*
HOME-ARP does not fund congregate shelters, though this comment is being considered in how the proposed permanent support housing units are designed.
- *Need a specialized shelter for older adults who fear going to regular shelter.*
HOME-ARP does not fund congregate shelters, though this comment is being taken into consideration as we create our overall homelessness strategies.
- *Use funds to help homeowners and/or heirs so as to preserve wealth for low-income and Black, Indigenous, and people of color (BIPOC) homeowners.* HOME-ARP does not fund services for homeowners, or for heirs where there is an interest in preserving family wealth. Those interested in this topic have been referred to the Boston Home Center to explore other programmatic possibilities for addressing these needs.

MOH will complete this summary at the end of the comment period prior to submitting the HOME-ARP allocation Plan to HUD for review.

Needs Assessment and Gaps Analysis

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

The City of Boston has combined data from the 2022 Point in Time (PIT) homelessness count, our Continuum of Care Housing Inventory Counts (HIC), the American Community Survey, Comprehensive Housing Affordability Strategy (CHAS) data, and the City of Boston's income-restricted housing inventory to generate the tables below.

The following tables suggest that in order to meet the needs of Boston residents experiencing homelessness, an additional 2,288 units of permanent housing is needed. Boston also needs almost 23,000 additional income-restricted rental units to meet the needs of Boston's low-income households more generally.

City of Boston, Mayor’s Office of Housing, HOME-ARP Allocation Plan (DRAFT)

Table 1: Homeless Needs Inventory and Gap Analysis

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	2,841	929	1,078	n/a	31								
Safe Haven	0	0	67	n/a	37								
Transitional Housing	53	26	238	n/a	108								
Permanent Supportive Housing	643	315	2,342	n/a	686*								
Other Permanent Housing	2,341	890	1,827	n/a	190*								
Sheltered Homeless						929	1,359	174	193				
Unsheltered Homeless						0	119	6	0				
Current Gap										2,841	929	1,359	1,359

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

*Based on the way data is reported, these counts likely underestimate the number of Veterans in permanent supportive and other permanent housing.

Table 2: Housing Needs Inventory and Gap Analysis

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	176,686		
Rental Units Affordable to HH at 30% of AMI (At-Risk of Homelessness)	15,483		
Rental Units Affordable to HH at 31% to 50% of AMI (Other Populations)	21,065		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		42,480	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		16,810	
<i>Current Gaps</i>			22,742

Data Sources: 1. American Community Survey (ACS) 2016-2020 5-year Estimates; 2. Comprehensive Housing Affordability Strategy (CHAS) data, 2014-2018; 3. MOH Income-Restricted Housing Inventory through 2021.

HOME-ARP funds are intended to assist "qualifying populations" which are based on individuals' and families' status, rather than income. The four categories included in the definition of qualifying population are:

1. Homeless
2. At-risk of homelessness
3. Fleeing/Attempting to Flee Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking
4. Other Populations where assistance would prevent the family's homelessness or serve those with the greatest risk of housing instability

Funds must primarily assist households that meet the status of "qualifying populations" but 30 percent of rental units funded with HOME-ARP may be occupied by low-income households, whose annual incomes do not exceed 80 percent of the median income for the area.

Boston area income limits are posted here:

<https://www.boston.gov/departments/housing/housing-and-urban-development-income-limits>

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

Homeless as defined in 24 CFR 91.5

4,422 Bostonians are currently unsheltered or living in an emergency shelter or transitional housing according to HMIS data. 89 percent (3,945) of these Bostonians are living in emergency shelters, seven percent (291) are living in transitional housing, two percent (67) are living in safe havens, and three percent (119) are unsheltered. Eleven percent (502 persons) of the population experiencing homelessness are considered chronically homeless. HUD's definition of chronically homeless is posted here:

<https://www.hudexchange.info/homelessness-assistance/coc-esg-virtual-binders/coc-esg-homeless-eligibility/definition-of-chronic-homelessness/>

Of the 4,422 sheltered and unsheltered persons, 39 percent (1,708 persons) are children under age 18, eight percent (361 persons) are between ages 18-24, and 53 percent (2,353 persons) are adults over age 24. In terms of gender, 51 percent (2,231) identify as female, 49 percent (2,174) identify as male, 0.02 percent (nine) identify as transgender, and 0.02 percent (eight) identify as gender non-conforming.

According to Boston's Homeless Management Information System (HMIS), 14 percent (629) of all persons experiencing homelessness have a serious mental illness, nine percent (403) have a substance use disorder, four percent (193) are survivors of domestic violence, and 0.5 percent (23) are adults with HIV/AIDS.

Certain races/ethnicities disproportionately experience homelessness. Well over one-third (37 percent) of the population experiencing homelessness is Hispanic/Latinx though they make up only 20 percent of Boston's population.¹ Well over half (56 percent) of the population experiencing homelessness is Black/African American, though they make up 29 percent of Boston's population. Only 37 percent are White, six percent multiracial, one percent Asian, one percent Hawaiian/Other Pacific Islander, and 0.5 percent American Indian/Alaskan Native.

At Risk of Homelessness as defined in 24 CFR 91.5

Under Federal Notice CPD-21-10, households at risk of homelessness are those with incomes of less than 30 percent of Area Median Income and face certain forms of housing instability. Given that Boston has almost 34,000 undergraduate and graduate students living off-campus, this population can lead to overestimates of need. As a result, when using the American Community Survey (ACS) data, need is estimated based on non-student households. According to the 2016 to 2020 ACS five-year estimates, there are 65,960 non-student households with incomes of less than 30 percent of AMI.

¹ American Community Survey, 2016-2020 Estimates. Those who are Hispanic/Latinx may be of any race, and therefore there is overlap with both the White and Black/African American populations.

City of Boston, Mayor’s Office of Housing, HOME-ARP Allocation Plan (DRAFT)

While households with incomes less than 30 percent of AMI represents a large number of Boston households, they must also meet the following criteria:

- 1) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and
- 2) Meets one of the following conditions:
 - (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 people 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;

The City of Boston does not have data on many of these conditions, but there has been strong need for federally funded Emergency Rental Assistance, as the City of Boston has assisted more than 5,000 Boston households, and the state’s program has assisted an additional 13,730 Boston households. In addition, from November 2020 through March 2022, 1,794 households were notified of eviction filings.

The American Community Survey does provide data on overcrowding and housing cost burden, and according to 2016-2020 estimates, 529 non-student households with incomes less than 30 percent of AMI had more than 1.5 persons per room, less than one percent of households in this income range. While there is certainly overlap with those who are overcrowded, there are 35,206 households in this income range who are severely cost burdened and pay more than 50 percent of their income towards rent.

In addition, the Boston Public Schools does have their own estimates of homelessness, which also gives us insight to the level of less visible homelessness where students are doubled up.

Boston Public Schools, School Year 2021/2022 Homelessness Count	
Doubled Up	2,012
Hotels/Motels	127
Shelters	1457
Unsheltered	60
TOTAL	3,656

Source: Boston Public Schools

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

While only four percent of those experiencing homelessness tracked in the HMIS data indicated they were unhoused because of domestic violence. Other data suggest that a high percent of individuals experience some form of intimate partner violence (IPV), sexual assault, and stalking at one or more points in their lives. Jane Doe, Inc, reports that one in five Massachusetts residents report domestic violence as a reason for homelessness.²

Looking at sexual assault data, the 2015 Boston Behavioral Risk Factor Survey found that, over their lifetime, 11 percent of women, and three percent of men, had been sexually assaulted.³ While police reports do not capture all incidents of sexual and domestic violence, the Boston Police Department reported 210 rapes and attempted rapes in 2021, and 781 domestic aggravated assaults in 2021.

The National Intimate Partner and Sexual Violence Survey (NISVS) does not provide city-level data, but it does provide data by race, ethnicity, and gender. As such, extrapolating from the national data to Boston provides a rough estimate that 34.5 percent of women and 17.3 percent of men will experience some form of Contact Sexual Violence in their lives, and that 37.2 percent of women and 31.1 percent of men will experience some form of Intimate Partner Violence during their lifetimes.⁴

² Jane Doe, Inc. (2020). “Domestic Violence: A Global and Local Epidemic,” accessed at https://janedoe.org/wp-content/uploads/know_more/DV_Factsheet_2020.pdf

³ Boston Public Health Commission (2019) *Health of Boston, 2016-2017*. Page 505. All Health of Boston reports can be accessed at <https://www.boston.gov/government/cabinets/boston-public-health-commission/health-data/health-boston>

⁴ MOH analysis 2016-2020 American Community Survey 5-year estimates for Boston data to adjust from 2020 National Intimate Partner and Sexual Violence Survey (NISVS) data, found at <https://bjs.ojp.gov/data-collection/news>.

City of Boston, Mayor’s Office of Housing, HOME-ARP Allocation Plan (DRAFT)

In terms of other, more local data, the Network/La Red, completed a survey in 2019 to inform a needs assessment for LGBTQ (Lesbian, Gay, Bisexual, Transgender and Queer or Questioning) communities. In this survey, they found that 81 percent had not felt safe in a relationship sometime in the past five years.⁵ While the survey did not ask additional questions to help us understand the types of intimate partner violence experienced, this survey still provides insight into the needs of these communities.

The Asian Task Force Against Domestic Violence found in a 2000 survey that 38 percent knew a woman who was physically battered by a partner, and 12 percent knew a man who had been physically battered by a partner.⁶ It should be noted that the report was careful to note that the experience varied dramatically among the various Asian communities in Massachusetts.

As part of the HOME-ARP consultation process, MOH staff learned that the evidence related to meeting the housing needs of this qualified population is scarce. As a result, MOH is proposing spending a portion of the HOME-ARP administrative funds on a study that will help to fill this gap in our understanding of housing and service needs for those who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking,

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:

Other populations, as outlined in the HOME-ARP federal notice, include families requiring other services, such as rental assistance. During the COVID-19 pandemic, Boston has had a strong demand for rental assistance. At the beginning of the COVID-19 pandemic in 2020, the City of Boston established a Rental Relief Fund for emergency rental assistance. This fund has since distributed \$35 million to more than 5,000 households. Almost all of these households earn less than \$58,000 per year (around 50 percent of AMI). The average award per household was \$8,776, and could be used for rental arrears, future rent, utilities, and/or moving costs. Another measure of housing insecurity is the volume of calls made to MOH’s Office of Housing Stability (OHS). Over the last two years (2020 and 2021), 27,806 calls were made to OHS (16,717 in 2020 and 11,089 in 2021), with an average of 262 calls per week (average of 315 per week in 2020 and 209 in 2021).⁷ This does not include additional walk-in residents who sought in-person help from OHS. As we start to emerge from the pandemic, demand for rental assistance and calls related to housing instability is still high, reflecting the deep-seated housing instability that existed before the pandemic, and which continues to persist.

Under Federal Notice CPD-21-10, other populations at greatest risk of housing instability include households with incomes of less than 30 percent of Area Median Income who pay 50

⁵ The Network/La Red (2020) *Survivor Stories: Learning From LGBTQ/T Communities in MA*. Accessed at <http://tnlr.org/wp-content/uploads/Survivor-Stories-Learning-From-LGBTQ-Communities-in-MA.pdf>

⁶ Yoshioka, Marianne, and Quynh Dang (2000) *Asian Family Violence Report: A Study of the Chinese, Cambodian, Korean, South Asian and Vietnamese Communities in Massachusetts*. Asian Task Force Against Domestic Violence, Inc. Accessed at <https://www.atask.org/site/publications/family-violence-report.html>

⁷ MOH Office of Housing Stability call data

City of Boston, Mayor’s Office of Housing, HOME-ARP Allocation Plan (DRAFT)

percent or more of their income towards housing costs. Given that Boston has almost 34,000 undergraduate and graduate students living off-campus, this population can lead to overestimates of need. As a result, when using the American Community Survey data, need is estimated based on non-student households. According to the 2016 to 2020 ACS five-year estimates, there are 65,960 non-student households with incomes of less than 30 percent of AMI, and of these, 36,608 households (56 percent) are severely housing cost burdened, and more at risk for homelessness.

In addition, households with incomes of less than 50 percent of Area Median Income who meet the same housing instability criteria outlined earlier are also considered part of the “other populations” and qualify for HOME-ARP assistance. In Boston, there are 26,478 non-student households who have incomes of between 30 and 50 percent of Area Median Income, and of these, 9,363 pay more than 50 percent of their income towards housing, and are therefore severely housing cost burdened⁸. While this data does not correlate directly with the housing instability criteria, it does provide some insight on the affordability challenges facing low-income Boston residents. Boston area income limits are posted here:

<https://www.boston.gov/departments/housing/housing-and-urban-development-income-limits>

Data from the Boston Housing Authority wait lists also provides some idea as to the needs of Boston residents who may be at risk for homelessness. While eligibility for vouchers is restricted to 50 percent of AMI, and 80 percent of AMI for public housing, the median income of BHA residents is less than 20 percent of AMI. As of February, 2022, the BHA had almost 39,000 total applicants for family programs, of which almost 7,000 were high-priority applicants,⁹ There were over 13,000 applicants for elderly/disabled programs, of which almost 3,000 were high-priority,

Qualifying Populations: Conclusion

There is considerable evidence that suggests there are a substantial number of residents for whom HOME-ARP funded services and housing are needed. Indeed, just meeting the needs of the 4,422 sheltered and unsheltered individuals in need of more permanent housing would require more funding than HOME-ARP provides.

⁸ MOH analysis of 2015-2019 American Community Survey PUMS data.

⁹ Priority one applicants include individuals and households with any of the following circumstances:

Displaced Due to Disaster, such as a flood or fire

Displaced Due to Domestic Violence/ Dating Violence/Sexual Assault/ or Stalking

Displaced due to Being a Victim of Hate Crime

Displaced due Avoidance of Reprisal/Witness Protection

Displaced due to Court Ordered no Fault Eviction

Condemnation of House/Apartment (e.g. your housing has been declared unfit for habitation by an agency of government through no fault of your own) or a displacement due to other government action

For Disabled Persons only, Inaccessibility of a Critical Element of their current Dwelling Unit

Displaced due to Being Cost Burdened in Boston

Homelessness

Graduates of Project-Based Voucher Units Who Have Fulfilled Supportive Service Goals

City of Boston, Mayor's Office of Housing, HOME-ARP Allocation Plan (DRAFT)

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

MOH is the lead agency for the Boston Continuum of Care (CoC). Since 2014, MOH and its CoC partners have placed over 1,600 Veterans in permanent housing and in 2015 the CoC was certified by the United States Interagency Council on Homelessness (USICH) for ending chronic Veteran homelessness. Since 2014, MOH and its CoC partners have placed more than 6,500 homeless individuals in permanent housing.

MOH and HUD resources work together to create a system of Coordinated Entry and rapid exit from shelter in order for the experience of homelessness to be rare, brief, and non-recurring. In order to achieve these goals HUD's System Performance Measures are tracked, including: length of time (LOT) persons remain homeless; whether persons who exit homelessness for permanent housing return to homelessness (recidivism); the change in the number of homeless persons through the annual Point In Time Count; the growth in employment and income for homeless persons in CoC-funded programs; the number of persons who become homeless for the first time and successful placement from Street Outreach to permanent housing.

In response to the COVID-19 public health emergency, MOH reconstituted its CoC Leadership council to better respond to the challenges presented by COVID-19 and the potentially devastating impact on people experiencing homelessness. The CoC has continued to support shelter providers throughout the duration of the COVID-19 pandemic with resources to create safe emergency shelter spaces, create new housing resources, and allow housing navigator staff to continue the work of exiting people from shelter. Through its Office of Housing Stability and Supportive Housing Division, the CoC is assessing families at risk of or experiencing homelessness and referring those families to prevention, short-term flexible funding to immediately resolve housing crises, or rapid rehousing resources based on the CoC's Written Standards and prioritization order.

Boston relies on a number of federal funding sources for this work. In March 2022, the Boston CoC secured \$38 million in federal HUD McKinney-Vento CoC funds on behalf of 15 organizations that offer a range of services and supports, including housing search, the creation of housing for chronically homeless people, rapid re-housing funds, and stabilization services to allow newly housed chronically homeless individuals to receive the support they need to succeed.

Boston also received, for HUD Fiscal Year 2022, \$1.6 million in Emergency Solutions Grant (ESG) funds, which are used for street outreach and to provide homelessness prevention services for individuals and families.

City of Boston, Mayor’s Office of Housing, HOME-ARP Allocation Plan (DRAFT)

In addition, through the federal CARES Act, Boston received \$28,543,879 in ESG-CV funds. Emergency shelter funds are used primarily to stand up temporary, non-congregate shelter facilities so as to de-densify existing shelters to slow the spread of COVID-19.

ESG-CV Budget by Activity		
Emergency Shelter	\$11,577,485	40.6%
Rapid Rehousing	\$14,000,000	49.0%
Homelessness Prevention	\$1,187,350	4.2%
Street Outreach	\$515,465	1.8%
HMIS	\$458,792	1.6%
Administration	\$28,543,879	100%

Source: ESG-CV Plan, Substantial Amendment, accessed at <https://www.boston.gov/sites/default/files/file/2021/08/ESG-CV%20Plan.pdf>

The ***Initiative to End Youth Homelessness*** recently was awarded \$2.64 million by HUD to support a wide range of housing programs including rapid rehousing, permanent supportive housing, and transitional housing for youth and young adults (YYA) experiencing homelessness and housing instability in Boston. The housing interventions are innovative, flexible, and responsive to the needs of young adults. Young adults with lived experiences of homelessness and housing instability participated in drafting the program and reviewing applications. Through Federal funding, such as the Continuum of Care grant and Emergency Solutions Grant through the CARES Act (ESG-CV), Boston has added 180 housing units. In addition, the City committed in its FY22 budget \$2.75 million to support youth housing programs. MOH is funding 97 new youth housing opportunities and incorporating peer navigation to assist Youth and Young Adults (YYA) in accessing housing and services. With the support of local, federal and private dollars, the City has created 287 housing opportunities and has reached 100 percent of the goal to create 285 housing units for YYA.

This year MOH will pilot two new programs dedicated to youth and young adults experiencing homelessness or housing instability in Boston. One is a rapid rehousing program for students enrolled in the Boston Public School system. This program will serve 15 BPS students who are unaccompanied and experiencing homelessness. The second is an employment and savings pilot, to incentivize young people to pay more towards rent while enrolled in rapid rehousing.

In addition to these funds, Boston has, as outlined in the CoC Housing Inventory Count, the following facilities to address homelessness:

- 3,950 emergency shelter beds,
- 104 Safe Haven beds,

City of Boston, Mayor's Office of Housing, HOME-ARP Allocation Plan (DRAFT)

- 399 transitional housing beds,
- 3,671 permanent supportive housing (PSH) beds, and
- 4,358 other permanent supportive housing beds.

Boston is working diligently to add to these numbers. The Boston Housing Authority (BHA), in cooperation with the CoC applied for and received 410 HUD Mainstream Vouchers to assist non-elderly persons with disabilities. The BHA's homeless priority applies to these vouchers. BHA committed 100 Mainstream Vouchers to the CoC's Street to Home Initiative, targeting the most vulnerable homeless individuals who are sleeping unsheltered through a fast-track referral process as outlined in a draft Memorandum of Understanding (MOU) between the CoC and the BHA. The initiative is also leveraging CARES Act ESG-CV funding. In addition, BHA has committed to project-basing Mainstream Vouchers in two large scale Permanent Supportive Housing (PSH) developments in the pipeline. One of these developments, located at 140 Clarendon Street, is a partnership between Pine Street Inn and Beacon Communities and will have 111 PSH units. The other development, located at 3368 Washington Street is a partnership between Pine Street Inn and The Community Builders and will have 140 PSH units.

While not operated by the City of Boston, it is important to note that Massachusetts is the only state in the country with a law requiring that the State provide shelter for eligible families experiencing homelessness. As a result, the State of Massachusetts operates the Emergency Assistance program, which houses approximately 3,000 families in emergency shelters at any given time, and when necessary to meet demand, houses families in motels.

The CoC continues to partner with the Boston Housing Authority (BHA) and the State's Department of Housing and Community Development (DHCD) to administer a homeless admission preference. The BHA is the largest affordable housing provider in the CoC and has a long-standing partnership with the Boston CoC to adopt preferences for homeless populations in its public housing, Project Based Vouchers (PBV) and Housing Choice Voucher (HCV) portfolios. BHA's Administrative Plan gives a homeless priority across its portfolio and also has a long-term homeless preference for the entire PBV portfolio, which was created based on advocacy from the CoC. The BHA has also adopted a policy that households in a Rapid Rehousing Program (RRH) maintain their homeless status. BHA has a Memorandum of Agreement (MOAs) with numerous homeless, public health, hospital or social services agencies. Over 1000 Public housing units, Project or Tenant-based Vouchers go to Family Households with Children via: *A Healthy Start in Housing* (BPHC); *Health Starts at Home* (Boston Medical Center), *HomeBase FastTrack* (Metro Boston Housing Partnership), *Leading the Way Home* matches 500 BHA mobile vouchers and *Emergency Assistance* funded stabilization to Boston families with the longest length of stay in Emergency Shelter; *Family Unification Program* (FUP) vouchers house over 190 Massachusetts Department of Children and Families (DCF) involved families. MOH's Deputy Director of Supportive Housing and MOH's Advisor for Boston's System to End Homelessness meet regularly with BHA senior leadership to review utilization, ensure smooth referrals from CoC agencies to BHA and monitor service match. BHA

City of Boston, Mayor's Office of Housing, HOME-ARP Allocation Plan (DRAFT)

is a leader in the CoC Housing and Stabilization Leadership group and participates in the case conferencing work group and the Veterans work group.

Boston CoC partners with the Boston Housing Authority (BHA), our local PHA, to include their funded units in our Coordinated Entry System (CES). Homeless clients who are assessed through our CE assessment tool are asked questions that determine their interest in types of housing opportunities (RRH, TBV, PBV), including BHA units. Clients who are housed through a RRH program are assessed w/ the PSH to RRH Transfer Assessment that also asks about their interest in housing opportunities. BHA reports vacancies (TBV, PBV) and eligibility requirements, including the priority populations (shelter stayer, outside stayer, Domestic Violence client, transfer client) for that specific resource, to the CoC CES manager who creates a list of eligible clients from the assessment lists, ranks them on cumulative days homeless for the CE assessment or score in the RRH to PSH Transfer Assessment, and sends a referral list to BHA. BHA then follows up directly with the client and their case manager. The BHA and the CoC have MOUs for different resources that detail the eligible resources, priority populations, services to be provided to clients (case management), CoC to BHA referral process, housing search and placement (including funding move in costs), post-placement stabilization services, and PHA and CoC roles and responsibilities (staffing, referrals, engagement). Specific details of how clients are assessed and prioritized are not written into the MOU, though BHA is on the CoC Housing and Stabilization Leadership Committee and has been part of the conversations around the methods by which clients are prioritized and referred. In addition, MOH organizes housing surges in coordination with the Boston Housing Authority, the state, and service providers to pair housing authority units or vouchers with supportive services. Housing surges are one-time events for eligible clients who are at the top of the CES priority list; the goal is for guests to walk out with a housing offer from BHA and enroll in supportive services.

Describe the unmet housing and service needs of qualifying populations:

The most urgent need of the qualifying populations for safe, affordable, and sustainable housing. Boston's rents are among the highest in the nation, and the rental market does not provide housing for very-low income tenants: less than one percent of advertised rentals in 2021 were affordable to households with an income of \$50,000.¹⁰ In addition, as of February 2022, there are currently 38,605 applicants on the Boston Housing Authority's waitlist for family programs, of which 6,790 are "priority one" applicants (a measure of need that overlaps with the HOME-ARP qualified populations), and there are 13,369 applicants for the elderly and disabled programs, of which 2,991 are "priority one" applicants. For these reasons, it is Boston's income-restricted housing stock that extremely-low income households must turn to, and while 27 percent of Boston's rental housing is income-restricted, as shown in the Housing Needs Inventory, a gap remains of over 22,000 units for households with incomes less than 50 percent of Area Median Income.

¹⁰ MOH analysis of MLS/Rental Beast advertised rental listings, 2021.

City of Boston, Mayor's Office of Housing, HOME-ARP Allocation Plan (DRAFT)

While the City of Boston requires that ten percent of income restricted units be set aside to address homelessness in City funded projects, and that a Coordinated Entry System is used to assure that these and other permanent supportive housing units are filled by individuals and families who need such units, there remain a gap in the number of units with wrap-around services, supportive services, and other assistance that could prevent homelessness or housing instability. In addition, the COVID-19 pandemic and the opioid epidemic have exposed further the gaps in Boston's homelessness response system.

In the early stages of the pandemic, the need for general, non-congregate shelter became apparent, as the City worked to de-densify shelters, and efforts to reduce economic instability caused by the pandemic, such as rental relief and eviction interventions, helped to stave off increases in family homelessness. There were fewer tools in place, however, to respond to those affected by the intersection of mental health, homelessness, and drug addiction. A number of services to assist this population are co-located near the intersection of Massachusetts Avenue and Melnea Cass Boulevard, where the neighborhoods of the South End, Roxbury and the Newmarket District meet. Known as "Mass/Cass", an encampment arose during the pandemic. While the City is making its best efforts to respond to this humanitarian crises, and individuals in the encampments have been placed in temporary housing, it has highlighted the need for low-threshold, non-congregate shelter, as well as more upstream, permanent supportive housing with programming that meets the specific needs of this population.

The following outlines the needs, by each qualifying population.

Homeless as defined in 24 CFR 91.5

As outlined in the Homeless Needs Inventory and Gap Analysis (Table 1), 939 families (containing 2,841 individuals) and 1,359 individuals are sheltered or unsheltered homeless. Our priority is getting these families into permanent, more stable housing. In order to do so, we must create additional permanent supportive housing units, but given the time it takes to develop such housing, TBRA and services will be needed to help these families and individuals with a bridge from shelter and the street to this permanent housing. PSH, TBRA, and services were all identified in our consultation and priority needs, and are not readily met by other funding sources.

At Risk of Homelessness as defined in 24 CFR 91.5

As outlined previously, there are 35,206 non-student households in Boston who earn less than 30 percent of Area Median Income who are severely cost burdened and pay more than 50 percent of their income towards rent. The vast majority of these households are one illness or a missed paycheck away from homelessness, and the most important need is income-restricted housing and long-term vouchers.

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

Determining the gaps in service and delivery system for this population specifically is difficult due to the lack of housing needs data available. Through our consultations, however, it is clear that additional housing, TBRA, and stability services are needed for this population. We will be allocating some of our administration funding towards research to help us to assess these needs.

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

As outlined previously, there are 9,363 non-student households who have incomes of between 30 and 50 percent of Area Median Income, and who pay more than 50 percent of their income towards housing, and are therefore severely housing cost burdened. As with our other populations with a risk for homelessness, the primary need is for income-restricted housing and/or long-term vouchers.

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

As outlined previously, due to Boston’s high housing costs, the overarching need is for additional income-restricted housing and long-term vouchers. As it relates to those who have experienced homelessness, the need is specifically for permanent supportive housing. Given the Massachusetts Emergency Assistance program (for families), and existing shelter resources, there is not a significant need for additional shelter, but there remains a need for stable housing. Boston is also struggling to meet the needs of those affected by the opioid epidemic. Like many cities, Boston has seen new encampments, especially in the area around the intersection of Massachusetts Avenue and Melnea Cass Boulevard (“Mass and Cass”). While specific efforts were taken at the end of 2021 to address the needs of these residents, some are still in temporary, non-congregate shelter or other transitional housing, and additional services, tailored to their needs, are necessary to help these individuals move into more stable housing.

Our consultations also highlighted the need for additional TBRA. While the City of Boston has created its own housing voucher program and the Boston Housing Authority is taking every opportunity to expand the number of state- and federally-issued vouchers, and ESG-CV and other resources have been used to rapidly rehouse those who have experienced homelessness, there is a specific need for a TBRA “bridge” from the short-term assistance to long term housing or assistance, that the HOME-ARP funds can help with.

The need for additional services, especially housing search services, was identified in the consultation process. Navigating Boston’s housing systems is challenging. Despite a state law

City of Boston, Mayor’s Office of Housing, HOME-ARP Allocation Plan (DRAFT)

that protects voucher holders from discrimination, a 2020 Suffolk University study revealed just how common voucher discrimination takes place.¹¹

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:

The City of Boston is not establishing additional characteristics in defining Other Populations.

Identify priority needs for qualifying populations:

As highlighted previously, there are 3,945 Boston residents who have no place to call home. Our first goal must be to find ways to assist these households, through the creation of more supportive housing. While the creation of additional vouchers would also be helpful, for far too many current voucher holders, the difficulties of finding housing affordable with a voucher emphasizes the importance of building additional income-restricted housing. In addition, while we have been able to help a number of individuals and families move from homelessness into housing with ESG-CV funded vouchers, that funding is coming to an end, and so we need to extend their vouchers through HOME-ARP funded TBRA as a bridge to a permanent voucher or a housing placement.

In addition, there are gaps in our service delivery model, including additional funding for housing search and a variety of supportive services that allow those who have experienced homelessness to remain stable in their housing, and is particularly needed for those currently on short-term rental assistance. .

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

Using the City’s HMIS, specifically the PIT count and the HIC, we were able to describe the demographics of the population experiencing homelessness, as well as assess the current level of acute need in comparison to the opportunities currently available. The information system provides vacancy data for emergency shelter and permanent supportive housing.

In addition, the American Community Survey 2016-2020 5-year estimates from the Public Use Microdata Sample (PUMS) were used to assess the number of cost

¹¹ Suffolk (2020)

<https://www.suffolk.edu/news-features/news/2020/06/27/01/03/qualified-renters-need-not-apply>

City of Boston, Mayor's Office of Housing, HOME-ARP Allocation Plan (DRAFT)

burdened households. Comprehensive Housing Affordability Strategy (CHAS) data from 2014-2018 and data from the Mayor's Office of Housing's Income-Restricted Housing Inventory through 2021 was used to assess the gap between the number of households earning less than 50 percent AMI and the number of housing units available and affordable to them.

Call and walk-in client data from the Office of Housing Stability (OHS) in the Mayor's Office of Housing was used to better understand demand for housing assistance and overall housing insecurity in Boston over the last two years.

HOME-ARP Activities

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

Housing Production: Funding will be allocated through a competitive application process open to all eligible entities, including nonprofit housing organizations and for-profit developers. To be considered eligible for Program funds, MOH will require that recipients, at a minimum meet the following criteria:

- a) Make acceptable assurances to MOH that it will comply with the requirements of the HOME-ARP Program during the entire period that begins upon selection of the recipient to receive HOME-ARP funds and ending upon the conclusion of all HOME-ARP Program funded activities.
- b) Demonstrate the ability and financial capacity to undertake, comply, and manage the eligible activity.
- c) Demonstrate its familiarity with the requirements of other Federal, State, or local housing programs that may be used in conjunction with HOME-ARP Program funds to ensure compliance with all applicable requirements and regulations of such programs.
- d) Have demonstrated experience and capacity to conduct HOME-ARP Program eligible activities as evidenced by its ability to own, construct, or rehabilitate, and manage and operate an affordable multifamily rental housing development.

Tenant Based Rental Assistance and Supportive Services:

Funding for tenant based rental assistance and supportive services will be allocated to existing subrecipients, who were initially selected through an RFP process for the ESG-CV funds in 2021. These funds will both extend rental assistance for households where ESG-CV funding is ending and provide services such as support with housing search; housing and benefits

City of Boston, Mayor’s Office of Housing, HOME-ARP Allocation Plan (DRAFT)

applications and reexaminations; treatment or case planning; coordination of on-going healthcare, including mental health and substance use treatment; and support with managing tenancy and community relationships. Depending on the availability of funds, new applicants may receive assistance, in accordance with the preferences provided in this plan.

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

The City of Boston did not appoint subrecipients or contractors for the development of the HOME-ARP allocation plan or administration of the HOME-ARP funds.

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

Use of HOME-ARP Funding

Proposed Budget	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$3,000,000	13.9%	N/A
Acquisition and Development of Non-Congregate Shelters	\$0	0%	N/A
Tenant Based Rental Assistance (TBRA)	\$7,000,000	32.4%	N/A
Development of Affordable Rental Housing	\$9,000,000	41.7%	N/A
Non-Profit Operating	\$0	0%	5%
Non-Profit Capacity Building	\$1,000,000	4.6%	5%
Administration and Planning	\$ 1,597,797	7.4%	15%
Total HOME ARP Allocation	\$ 21,597,797		

Additional narrative, if applicable:

None

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:

While Massachusetts is required to house eligible families experiencing homelessness, and Boston's point in time count of unsheltered individuals is relatively small, the underlying problem remains: Boston does not have sufficient housing that is affordable to Boston's lowest income households, and shelter, either congregate or non-congregate, is not the solution. In line with the most urgent concerns identified in the consultation process, we must use these funds to advance a "housing first" model, by using tenant based rental assistance as a bridge to more stable, income-restricted housing or a long-term voucher, build more permanent supportive housing, and assure that the services are in place to keep families and individuals stably housed.

Tenant Based Rental Assistance: MOH is dedicating \$7 million to tenant based rental assistance (TBRA). Through other funding sources, MOH has housed over 900 households from September 2021 through June 2022. Many of these households, however, are relying on short term, rapid rehousing assistance, where tenants are limited to two years of assistance or less, depending on the funding source. Given the high cost of housing and the challenges of securing permanent supportive housing and/or a long-term subsidy, HOME-ARP TBRA will be used primarily to keep these families and individuals stably housed beyond the expiration of existing funds. TBRA funds will also be used to meet the needs of other qualified populations most-at risk for homelessness.

Supportive services: Our consultation clearly identified a need for additional supportive services, such as support with housing search; housing and benefits applications and reexaminations; treatment or case planning; coordination of on-going healthcare, including mental health and substance use treatment; and support with managing tenancy and community relationships. Without supportive services, many at-risk households are unable to sustain housing and landlords are often less likely to serve these populations without these kinds of wrap-around services in place. The City of Boston intends to dedicate \$3,000,000 of the HOME-ARP funds to expand supportive services for eligible populations, primarily to those in rapid rehousing programs/receiving tenant based rental assistance, and to divert households from homelessness by addressing emergency costs that could result in the loss of housing.

Development of Affordable Rental Housing: While the Housing Needs Inventory and Gaps Analysis (Table 2, page 14) identifies that there are over 22,000 households needing housing who qualify as at risk of homelessness or as other populations, we heard clearly within our consultations that the specific form of housing needed is not simply rental housing, but permanent supportive housing. As a result, MOH is planning to invest all of the \$9 million allocated to this funding category to permanent supportive housing. In this way, we will begin to address the needs of the 2,288 sheltered and unsheltered households identified in the Homeless

City of Boston, Mayor's Office of Housing, HOME-ARP Allocation Plan (DRAFT)

Needs Inventory (Table 1, page 13), for whom housing is not the only need, but housing with services.

Non-Profit Capacity Building: While Boston has a number of strong partners in the permanent supportive housing and homelessness service space, there is a need to expand this network, not only to increase PSH production and meet need more broadly, but to encourage the growth of less-established organizations that work in this space. This is particularly important if the City wants to expand its efforts to assist certain populations, such as the formerly incarcerated/returning citizens, and LGBTQ+ individuals. Therefore, \$1 million has been set-aside to build capacity among supportive service providers.

Administration and Planning: Boston is choosing to use less than half of the funds available for administration for administrative costs. This is in part because Boston wants to maximize the amount of funds that will help individuals and families in need. It is worth noting that a portion of the administration funds will be used to fund efforts to better understand the need for resources for those who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This gap in our understanding was identified earlier in this plan, and these funds will provide us an opportunity to overcome this gap.

HOME-ARP Production Housing Goals

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

The City of Boston estimates that 90 new supportive and affordable housing units will be created from HOME-ARP funds.

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

The City of Boston, through a range of funding sources, has committed to a substantial increase in the number of supportive housing units, and is committed to a number of estimates that 650 new supportive housing units and housing for extremely low-income households will be added to the development pipeline by December 31, 2022. The City of Boston established goals for the creation of new housing for extremely low-income households in 2014, and updated the goal in 2018, to 1,900 units of housing to be built between 2011 and 2030. Through 2021, 1,156 such units had been permitted. With the addition of 650 additional units, we will have completed just over 1,800 units, making it possible to meet the year 2030 goal early. In addition, a new housing strategy, with new unit goals, will be established by the new administration of Mayor Michelle Wu, and we anticipate that the goals will be set higher, to address the ongoing affordable housing crises, especially for extremely low-income households.

Preferences

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

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

The City of Boston will use preferences, but these preferences differ by program area.

Tenant Based Rental Assistance (TBRA) and Supportive Services:

Preference for TBRA will be given to those who have received Rapid Re-Housing (RRH) assistance and other short term rental assistance, and for whom this assistance is ending. RRH clients were initially selected through the CoC's Coordinated Entry System (CES). In this respect, the program is, by default, prioritizing according to the CES eligibility standards, which are as follows:

As determined by the Boston Continuum of Care Coordinated Entry Steering Committee, eligibility for Coordinated Entry and a referral to housing within Coordinated Entry is based on the following criteria.

- Literally homeless (Sleeping outside, in a place not meant for human habitation, or in an emergency shelter/transitional housing program/safe haven)
- Fleeing/attempting to flee domestic violence (the individual or family must be fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member; have no other residence; and lack the resources or support networks to obtain other permanent housing)
- Staying in or exiting an institution where you resided for up to 90 days and were in shelter or a place not meant for human habitation immediately prior to entering that institution

Under the CES, Preferences among those deemed eligible is based on the following:

People with the longest histories of Boston homelessness

- Most cumulative Boston homeless nights in the last three years - max 1,096 days
- Cumulative nights include unsheltered, emergency shelter and transitional housing nights
- Breaks in institutions 90 days or less also count

People fleeing domestic violence

- Is fleeing, or is attempting to flee, domestic violence; and
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing

City of Boston, Mayor's Office of Housing, HOME-ARP Allocation Plan (DRAFT)

HOME-ARP funded TBRA and support services will be available to all qualified populations, However. while the first priority is for those who are having their current rapid rehousing/rental subsidy extended, depending on funding availability, new participants in the program will be served, and all Qualified Populations would be eligible, though the order of preference will be:

- Homeless as defined in 24 CFR 91.5;
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice;
- At Risk of Homelessness as defined in 24 CFR 91.5; and
- Other populations at greatest risk of housing instability as defined by the HUD Notice.

Development of Affordable Rental Housing:

Permanent supportive housing created with HOME-ARP funds will be available to the following Qualified Populations:

- Homeless as defined in 24 CFR 91.5; and
- Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice.

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

By funding permanent supportive housing over traditional income restricted rental housing, the City of Boston is meeting the important need of housing families and individuals who have experienced homelessness. For this reason, we are focusing this housing on these households. The City of Boston, however, is not limiting other programs (TBRA and supportive services), and all Qualified Populations are eligible for services, though there are priorities, in order to meet the specific needs of households who already receive assistance.

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

As stated above, while there will be limitations on eligibility for permanent supportive housing, all qualified populations will be able access a program funded by HOME-ARP. For TBRA and supportive services, there are preferences for those who are at risk for homelessness because of the ending of other subsidy sources, but other qualified populations remain eligible for these important resources.

HOME-ARP Refinancing Guidelines- NOT APPLICABLE to the City of Boston.

City of Boston, Mayor's Office of Housing, HOME-ARP Allocation Plan (DRAFT)

The City of Boston is committed to assuring that existing income-restricted and permanent supportive housing units are preserved. The City, however, does not anticipate using HOME-ARP funds for refinancing of existing housing and therefore does not need to establish refinancing guidelines.

Appendix A: Consultation Participants

The Mayor's Office of Housing thanks the following individuals and organizations for their participation.

<i>Consultation Meetings</i>		
<i>Meeting</i>	<i>Date</i>	<i>Attendees</i>
Homeless Services	4/4/22	Higher Ground Boston: K. Paz and M. Hacobian; Healthcare Without Walls: M. Grant, J. Peters; Justice for Housing, L. Credle; Mayor's Office of Housing: K. Holloway, D. Marchioni
Unsheltered	4/4/22	Higher Ground Boston: K. Paz and M. Hacobian; Episcopal Diocese of Mass, Rev. McCracken; Mayor's Office of Housing, D. Marchioni
Veterans	4/5/22	Healthcare Without Walls: M. Grant, J. Peters; South Boston Neighborhood House, C. Sullivan, Mayor's Office of Housing, K. Forde, D. Marchioni
Persons with Disabilities	4/6/22	Boston Center for Independent Living: S. French, B. Henning; K. McCosh, Disabilities Commissioner; R. Feynman, Mayor's Office of Housing, D. Marchioni
Elderly	4/6/22	Greater Boston Legal Services, B. Crimmins; Boston Medical Center, E. O'Brien, ETHOS: M. Gann, V. Pratt; Alianza Hispana, M. Amaya-Aluigi; Healthcare Without Walls, M. Grant; Mayor's Office of Housing, D. Marchioni
Continuum of Care	4/7/22	Healthcare Without Walls: M. Grant, J. Peters, R. Odimegwu; Justice for Housing, Justice for Housing, R. Smith; South Boston Neighborhood House, C. Sullivan; Mayor's Office of Housing, D. Marchioni
Public Housing	4/7/22	Boston Housing Authority: D. Gleich, G. Livingston, K. Bennett, J. Wool; Mayor's Office of Housing, T. Davis
Regional Voucher Issuing Agency	4/7/22	Metro Housing / Boston: B. Jaramillo, J. Terry J. Hillis, I. Islamovic, B. Neeley-Cruz; Mayor's Office of Housing, T. Davis
Fair Housing Community Advisory Committee	4/14/22	Lincoln Larmond, Chair; Greater Boston Legal Services: Nadine Cohen, Margaret Turner; Hajar Logan, Alternative for Community and Environment (ACE); Kathy Brown, Boston Tenant Coalition; Mayor's Office of Housing, Tim Davis