

Notice Title: State of Utah HOME-ARP Updated Allocation Plan

Entity: Department of Workforce Services

Body Name: Utah Homelessness Council

Notice Type: Notice

Street Address: 140 E 300 S, Salt Lake City, UT 84101

Start Date: 06/16/2022

End Date: 07/03/2022

Description:

Public Comment Period for HOME-ARP Allocation Plan Second Draft

The Utah Department of Workforce Services' (DWS) Office of Homeless Services (OHS) has been charged with allocating and administering \$12,978,715 awarded by The U.S. Department of Housing and Urban Development (HUD) through the HOME Investment Partnerships American Rescue Plan Program (HOME-ARP). This funding is for addressing homelessness and housing instability throughout Utah

Public comment may be provided from 06/16/22 until 07/03/2022 at 11:55 PM.

Additionally, comments can be provided in via email to russellgoodman@utah.gov or josephmjensen@utah.gov or through mail to 140 E 300 S, ATTN: Office of Homeless Services, Salt Lake City, UT 84101

ADA:

In compliance with the Americans with Disabilities Act, individuals needing special accommodations (including auxiliary communicative aids and services) during this meeting should notify Jennifer Marchant at 385-418-9989.

Public Comment can be provided via email to russellgoodman@utah.gov or josephmjensen@utah.gov

HOME-ARP Allocation Plan - 2nd Draft

Participating Jurisdiction: State of Utah

Date: Updated 06/15/2022

Introduction

The Utah Department of Workforce Services' (DWS) Office of Homeless Services (OHS) has been charged with allocating and administering \$12,978,715 awarded by The U.S. Department of Housing and Urban Development (HUD) through the HOME Investment Partnerships American Rescue Plan Program (HOME-ARP). This funding is for addressing homelessness and housing instability throughout Utah and can only be used to serve individuals that meet one of the following definitions, defined as "Qualifying Populations" in the HUD funding notice:

- Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11302\(a\)](#));
- At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act ([42 U.S.C. 11360\(1\)](#));
- Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
- In other populations where providing supportive services or assistance under section 212(a) of the Act ([42 U.S.C. 12742\(a\)](#)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability;
- Veterans and families that include a veteran family member that meet one of the preceding criteria.

Activities that can be undertaken with the funding can only be one of the following:

- Produce or preserve affordable housing;
- Provide Tenant-Based Rental Assistance (TBRA);
- Provide supportive services, including services defined at [24 CFR 578.53\(e\)](#), homeless prevention services, and housing counseling;
- Purchase and develop non-congregate shelter. These structures can remain in use as non-congregate shelter or can be converted to: 1) emergency shelter under the [Emergency Solutions Grants \(ESG\) Program](#); 2) permanent housing under the [Continuum of Care \(CoC\) Program](#); or 3) affordable housing under the [HOME Program](#).

After receiving notice of the funding award, OHS began performing an analysis on the need for these activities in Utah by utilizing data on homelessness and housing affordability available at the state and local level, consulting with local homeless councils, service providers, and other partners. After conducting this process, OHS has developed the following allocation plan proposal for HUD to review. This plan is designed to ensure that HOME-ARP funding is distributed in a coordinated, equitable fashion in order to make address the areas of greatest need in Utah.

Consultation

The State of Utah consulted with a wide variety of partners with expertise in serving HOME-ARP qualified populations. Utah divides the state into 13 areas with similar demographics and who have a history of collaboration in regards to serving those experiencing homelessness. These areas are called Local Homeless Councils (LHC) and each has identified local leadership that is tasked with overseeing the homeless response system for that LHC. Each of the 13 LHC's were approached for their input on the best use of HOME-ARP funds in relation to ending homelessness in their area. In addition to engaging with CoCs, LHCs, and mainstream homeless service providers, efforts were made to include groups with expertise who have not always participated in the CoC or LHC structure, such as the Disability Law Center and Utah ACLU. All parties listed in HUD CPD Notice 21-10 were consulted prior to the creation of the allocation plan and solicitation of input from the general public.

Partners were provided with an overview of the HOME-ARP requirements and were invited to provide their recommendations via virtual meetings or written responses. The online meetings facilitated discussion on general areas where the HOME-ARP funds may be effective. Specific recommendations for projects or programs were not considered through the consultation process. Areas with specific projects were encouraged to engage local leaders about the opportunity that HOME-ARP provides and to begin laying the groundwork for project applications once the allocation plan was approved. Input from all groups listed in HUD CPD Notice 21-10 were consulted initially through email and follow-up via phone calls and virtual meetings. Outreach was also conducted via recommendations from partners in the community on who would be the best groups to consult with.

Organizations consulted

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Salt Lake Area VA	Veterans Organization	Zoom call	Housing is a major need for homeless veterans.
Utah Domestic Violence Coalition	Domestic Violence Service Providers	Zoom Call, Web Survey	Additional housing and shelter capacity are needed for survivors of domestic violence. DVSPs are very interested in capacity building.
Utah Department of Human Services	Public agency that addresses the needs of the qualifying populations	Zoom call	The biggest gaps in their area of expertise is "step down" and transitional housing for those exiting mental health programs. Local health authorities gather data on people experiencing homelessness when entering programs, which will be used to show gaps for housing support for those individuals. Non-congregate shelter is preferred over congregate shelter for the population of those with severe mental illness.
Utah Balance of State CoC Leadership	CoC	Google Meet, Web Survey	Need in the BoS is varied. Specifically in the Weber county area, there are political barriers to non-congregate shelter though the need is great. Higher need for

			affordable housing and highly supportive housing vouchers.
Utah Disability Law Center	Private organization that addresses fair housing, civil rights, and the needs of persons with disabilities	Email	There needs to be a focus on development of housing, which is physically accessible, deeply affordable, and does not segregate residents with disabilities from the larger community.
Mountainland CoC	CoC	Zoom, Web Survey	The CoC sees non-congregate shelter and additional affordable housing as their greatest needs. Non-congregate shelter is a particularly high need as the only emergency shelter facilities currently in the CoC are DV dedicated and there is a need for more widely accessible shelter.
ACLU of Utah	Private organization that addresses fair housing, civil rights, and the needs of persons with disabilities	Email and Phone Requests	No specific feedback was provided, only support for this funding being used by the state for the activities listed in the notice.
Six County LHC	Homeless and domestic violence service providers	Phone, Web Survey	There is a need for supportive services, agency capacity building, and non-congregate shelter.
Bear River LHC	Homeless and domestic violence service providers	Google meet and email, Web Survey	Affordable housing and non-congregate shelter are a priority. Non-congregate could be as simple as a winter emergency facility. Supportive services and capacity building are also needed.
Ogden and Weber Housing Authorities	Balance of State CoC Leadership and Public Housing Authority	Google Meet	Need for affordable housing development and multiple projects in different stages of construction. Affordable housing funding would immediately impact the inventory in the Weber LHC.
Switchpoint Tooele	LHC member, Homeless service provider	Phone and Email	Affordable Housing and non-congregate shelter are top priorities. Have projects that have a small gap left to proceed.
Switchpoint and St. George City	LHC Chair and Homeless service provider	Email	Non-congregate shelter is the priority
Moab Valley Multicultural Center	LHC member and homeless service provider	Google Meet, Web Survey	Supportive services are lacking for immediate housing needs. A small Non-congregate shelter is another priority to

			provide somewhere for people to stay while looking for housing.
Iron County Care and Share	LHC member and homeless service provider	Zoom	Affordable housing and gap financing are extremely needed. Small non-congregate facility with flexibility would also be beneficial.
San Juan County	LHC chair and homeless service provider	Google form	Tenant Based Rental Assistance is the top priority, followed by supportive services.
New Horizons Crisis Center	LHC member/Domestic violence service provider	Phone Call	Affordable housing, non-congregate shelter, and capacity building are priorities in their community
Utah Homeless Network	Statewide Homeless Network, LHC Leadership	Zoom	Non-congregate shelter and affordable housing are the main priorities.
Salt Lake Valley Coalition to End Homelessness Executive Committee	LHC/CoC/PHA representative and Homeless service provider/Domestic Violence Service Provider	Zoom	Top priorities are development of affordable housing and non-congregate shelter. Recognized needs in other parts of the state and expressed support for prioritizing projects not in other PJs and those with other funding already secured.

Some organizations have been grouped with the larger LHC for easier viewing. All feedback received is presented as noted by the Office of Homeless Services staff conducting the consultation process.

Summary of Consultation Input

All agencies and groups consulted believed this funding was extremely needed in their communities. Non-congregate shelter and affordable housing were the two largest needs identified by a majority of groups. Additional needs were supportive services and agency capacity. A majority of groups consulted also identified category one, literal homelessness, as the most needy qualifying population to be targeted by this funding. All comments were considered when drafting this allocation plan.

Public Participation

- **Public comment period:** 02/8/2022-02/28/2022 and 06/16/2022-07/03/2022
- **Public hearing:** conducted via zoom and in person at the Metro Employment Center in Salt Lake City, UT on 02/18/2022.

Public comment period was solicited beginning on February 8th, 2022 and the public comment period closed on February 28, 2022. Notice of public comment period was sent to all members of the Utah Homeless Network and published on the Utah Public Notice website. A press release was shared with media sources provided by the Utah Department of Workforce Services outlining the time, place, and method for providing public input. An additional public comment period was held from June 16th, 2022 until July 3rd, 2022 to allow for input after changes were made due to recommendations from the local HUD field office.

A virtual public hearing was held in addition to the opening of the public comment period on February 15th, 2022 via Zoom virtual meeting/call-in with an in-person anchor location of the DWS Metro Employment Center, 720 S 200 E, Salt Lake City, UT 84111. Public notice was published in both Spanish and English, with a translator available for the virtual/call in public hearing. Information concerning virtual meeting access posted to the public notice website.

Notice of the public comment period and notice of the public meeting were posted separate to allow for review of the proposed plan prior to the meeting. Public comment was allowed for the entire window of February 8th through February 28th, 2022, which is a 21 day period for comment. An additional comment period was held from June 16th, 2022 until July 3rd, 2022 due to recommendations from the local HUD field office resulting in changes to sections of the allocation plan.

Summary of the comments and recommendations received through the public participation process:

OHS received public comment from twenty individuals during our initial public hearing and an additional seven written comments via email. OHS did not receive any direct recommendations for changes to the plan. There was general consensus that it was vital to use these funds to develop additional affordable housing. There was also support for acquiring and developing non-congregate shelter.

Summary of any comments or recommendations not accepted and the reason(s) why:

The only comments that were not accepted were those that called for using HOME-ARP funds for ineligible activities.

Needs Assessment and Gaps Analysis

2022 Point in Time and Housing Inventory Count

		Current Inventory								Homeless Population				
		Total		Family		Adults Only		Vets	DV	Total	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV
		# of Beds	# of Units	# of Beds	# of Units	# of Beds	# of Units	# of Beds	# of Beds					
Emergency Shelter		2,753		975	163	1,359		0	564					
Transitional Housing		595		418	117	177		97	334					
Permanent Supportive Housing		3,025		1,012	295	2,013		784	5					
Other Permanent Housing		452		398	110	54		6	0					
Rapid Rehousing		1,322		963	279	359		164	147					
Sheltered Homeless	Households									1,916	306	1,593	116	
	Individuals									2,684	1,056	1,609	117 Total Individuals (116 Veterans)	663
Unsheltered Homeless	Households									779	9	770	39	
	Individuals									872	23	849	55 Total Individuals (39 Veterans)	64
Total Homeless	Households									2,695	315	2,363	155	
	Individuals									3,556	1,079	2,458	172 Total Individuals (155 Veterans)	727

2021 Point in Time and Housing Inventory Count

		Current Inventory								Homeless Population				
		Total		Family		Adults Only		Vets	DV	Total	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV
		# of Beds	# of Units	# of Beds	# of Units	# of Beds	# of Units	# of Beds	# of Beds					
Emergency Shelter		2,621		826	127	1,267		0	495					
Transitional Housing		587		405	120	181		97	335					
Permanent Supportive Housing		3,276		1,197	315	2,079		847	10					
Other Permanent Housing		64		42	9	22		12	0					
Rapid Rehousing		1,436		995	297	441		203	119					
Sheltered Homeless	Households									1,875	221	1,644	129	
	Individuals									2,410	746	1,653	133 (Total individuals, 129 vets)	559
Unsheltered Homeless	Households									?				
	Individuals									1,155				
Total Homeless	Households									>1,875	>221	>1,644	>129	
	Individuals									3,565	>746	>1,653	>133 (Total individuals, 129 vets)	>559

2020 Point in Time and Housing Inventory Count

		Current Inventory								Homeless Population				
		Total		Family		Adults Only		Vets	DV	Total	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV
		# of Beds	# of Units	# of Beds	# of Units	# of Beds	# of Units	# of Beds	# of Beds					
Emergency Shelter		2,563		879	148	1,388		0	556					
Transitional Housing		550		360	100	189		105	309					
Permanent Supportive Housing		3,085		1,338	408	1,781		741	21					
Other Permanent Housing		174		56	13	118		5	0					
Rapid Rehousing		999		640	178	359		87	71					
Sheltered Homeless	Households									1,745	283	1,449	98	
	Individuals									2,427	961	1,453	104 (98 Vets)	656
Unsheltered Homeless	Households									639	7	632	16	
	Individuals									704	20	684	17 (16 Vets)	70
Total Homeless	Households									2,384	290	2,081	114	
	Individuals									3,131	981	2,137	121 (114 Vets)	726

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

Category 1: Individuals that are literally homeless, as defined by Federal Code 24 CFR 91.5

The 2022 Point in Time Count found that over 3,500 Utahns experienced literal homelessness on a single night in January. The data from the Utah Homeless Management Information System (UHMIS) shows that over 10,000 Utahns experienced sheltered homelessness during Federal Fiscal Year 2021. This annual count does not include those experiencing unsheltered homelessness, a population which made up about 25% of the 2022 PIT count and which our communities and partners report has grown in recent years, or those in facilities that do not enter into the system. Each of these statistics are considered to understate the total population of those experiencing homelessness in the state due to the difficulties in achieving a complete PIT count and the limitations on UHMIS participation.

The majority of those experiencing homelessness during the 2022 PIT count, 69%, were adults in households without children, while individuals in households of adults and children made up 30% of those counted. Unaccompanied children made up less than 1% of the overall count. 727 of those counted in 2022 identified as currently fleeing domestic violence, accounting for approximately 20% of the total count. Veterans made up approximately 4% of Utah's 2022 count, with 155 verified as experiencing homelessness on the night of the count.

Category 2: Individuals at risk of becoming literally homeless, as defined by Federal Code 24 CFR 91.5

The Utah Homeless Management Information System shows that 3,478 individuals who were at risk of becoming literally homeless were served in homeless prevention projects in calendar year 2021. 62% of these individuals were in households with children, while 30% were in households without children and 7% were in households of only children. 202 individuals or 5% were veterans. 320 individuals, or 9%, reported having experienced domestic violence and 64 of those reported that they were currently fleeing domestic violence.

While we know that this does not reflect the entirety of those experiencing housing instability who may be at risk of homelessness, we believe it is a good approximation of this population as the state has increased the number and size of its homeless prevention projects since 2020.

Category 3: Individuals fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

727 individuals fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking were identified in Utah's 2022 Point in Time Count. These individuals accounted for 20% of the total count. These individuals were more likely to identify as female and to be in households with children, while being significantly less likely to be veterans, than the overall homeless population reported in the 2022 count. 64 individuals who were fleeing domestic violence were served in homeless prevention projects during 2021 because they were at risk of experiencing homelessness.

The Utah Department of Health and Human Services reported that 3,324 individuals fleeing domestic violence accessed emergency shelters through domestic violence service providers in 2021. 51% of those

individuals were women and 43% were women or youth. DHHS also reported 44,525 crisis and hotline calls were fielded by domestic violence service providers and 10,825 individuals received crisis intervention services in calendar year 2021. While these metrics may overlap with individuals who were reported as experiencing literal homelessness in HMIS or the PIT, they give an insight into the number of people who may be attempting to flee domestic violence in 2021.

Category 4: Other individuals who do not meet one of the other criteria but do meet one of the following: Other families requiring services or housing assistance to prevent homelessness and at great risk of housing instability

The Emergency Rental Assistance (ERA) program, which assists renters who are at risk of eviction, has served 38,580 households for a total of \$187,7830,000. This indicates that the population for Category 4 is at least that size, and most likely much larger. According to a study of renter households conducted in 2020 by the Kem C. Gardner institute, one in four renters were minorities, which represents a disproportionate amount compared to the general population of Utah. A majority of renters households were more than two people, under 55 years of age. Two thirds of renters households were under the median area income of the state, and almost half were at or below 50% of the area median income.

Other groups at high risk of homelessness include households with no college education, approximately 45% of renter households in Utah, and households with only part time employment for the head of household, approximately 20% of renters.

Unmet housing and service needs of qualifying populations

Current resources available for all of the eligible activities listed in the HOME-ARP notice were identified during the consultation process as insufficient to meet the needs of the qualifying populations. Every partner that provided input for HOME-ARP activities described shortages in affordable housing, case management, rapid rehousing, and agency capacity building.

Category 1: Individuals that are literally homeless, as defined by Federal Code 24 CFR 91.5

The shortage of funding for affordable housing and supportive services for those experiencing literal homelessness far exceeds the funding awarded to the State of Utah in HOME-ARP. Different agencies and different methods of quantifying the shortage of housing and services yield different sizes of the gap, but all find that the amount of affordable housing in any community is below what is required for those who require it.

An example of one such study to find the housing gap was conducted by the Salt Lake CoC in August 2021 which found that in Salt Lake County alone there was a shortage of 900 deeply affordable housing units (under 40% AMI) and 750 permanent supportive housing units. This gap was anticipated to grow 47% each year in both categories.

Category 2: Individuals at risk of becoming literally homeless, as defined by Federal Code 24 CFR 91.5

The different conditions listed in the CFR for this qualifying population make estimating the unmet housing and service need very difficult. The most recent Utah consolidated plan identified 64,663 households as having one or more housing problems, which are defined as: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost burden over

50%. This data suggests that these households are at risk of becoming homeless and have an unmet need for safe, affordable housing.

Category 3: Individuals fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

Individuals fleeing or attempting to flee domestic violence face many of the same unmet service needs as individuals in categories 1,2 and 4. In addition, these individuals face an additional gap in the ability to access housing and services dedicated to meeting their unique needs. Utah is home to 14 emergency shelters dedicated to those fleeing domestic violence serving 29 counties, which forces many individuals in this category to travel long distances in order to access projects that meet their safety and services needs. The shelter beds currently available in domestic violence service providers are not sufficient to meet the current needs of those fleeing domestic violence. DHHS reported that Utah's domestic violence service providers were unable to meet 3,916 requests for shelter during 2021. The 2022 HIC also showed only 152 beds in housing projects, 5 in permanent supportive housing beds and 147 in rapid rehousing beds, are dedicated to this population. These numbers fall well below the number of people fleeing domestic violence on that same night.

Category 4: Other individuals who do not meet one of the other criteria but do meet one of the following; Other families requiring services or housing assistance to prevent homelessness and at great risk of housing instability.

Similarly to Category 2, this group is represented by a large portion of individuals in Utah. The most recent Utah consolidated plan reported 152,188 individuals pay more than 30% of their income on rent, and 103,263 pay more than 50% of their income on rent. This suggests an extremely large unmet affordable housing need for these households. Increases in affordable housing services would help reduce this need, but due to the small amount of funding available via HOME-ARP, this need would remain significant. Additionally, households that are severely rent burdened and at risk of homelessness who are unable to find affordable housing may require non congregate shelter facilities that do not exist in most of the state.

Current resources available to assist qualifying populations

Category 1: Individuals that are literally homeless, as defined by Federal Code 24 CFR 91.5

The 2022 HIC counted 2,753 emergency shelter beds and 595 transitional housing beds available to those experiencing literal homelessness statewide on a single night. The number of emergency shelter beds has been enhanced in recent years by the opening of non-congregate shelters funded with additional ESG funding made available to combat the impacts of COVID-19. There were also 3,025 permanent supportive housing beds, 452 other permanent housing beds, and 1,322 rapid rehousing beds dedicated to those formerly homeless individuals on that night. These resources are supported by a mix of federal, state, local government, and private philanthropic funds.

Currently in Utah, there is not a dedicated funding source for the creation of non-congregate shelter, making HOME-ARP a unique funding source for those communities who lack capacity to shelter all individuals experiencing homelessness or in need of crisis shelter services.

Category 2: Individuals at risk of becoming literally homeless, as defined by Federal Code 24 CFR 91.5

Currently, the State of Utah has access to homeless prevention funding in many areas of the state. This funding provides short term rental assistance for individuals at risk of homelessness. The Emergency Rental Assistance program is an additional resource, made available through the American Recovery Plan Act. This program has served 38,580 households in 2022, indicating that the number of individuals in need of homeless and eviction prevention continues to be a large population.

Utah has a variety of mechanisms to assist in the creation of affordable housing and for maintaining current supportive services capacity. This includes the National Housing Trust Fund, HOME, Low Income Housing Tax Credits, Local Affordable Housing Development Funds, State of Utah general funds, Emergency Solutions Grant funding, Temporary Assistance for Needy Families funding, Housing Opportunities for Persons with Aids, CoC Supportive Housing Vouchers, and other similar funding sources dedicated to the qualifying populations listed in the notice.

Category 3: Individuals fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

While individuals in this category have full access to all homeless response services available statewide, the 2022 HIC counted 564 emergency shelter beds and 394 transitional housing beds dedicated to serving those fleeing domestic violence statewide on a single night in January. There were also 5 permanent supportive housing beds and 147 rapid rehousing beds dedicated to this subpopulation of those leaving literal homelessness on that night.

Individuals who have experienced domestic violence also have access to a variety of services made available through funding provided by the Victims of Crime Act, Violence Against Women Act, and other state and private funding sources. This includes services for those who are attempting to flee domestic violence but do not meet the definition of literally homeless or those at risk of homelessness. The Utah Domestic Violence Coalition and its 27 member organizations work closely with state, local, and private partners to meet the needs of these individuals.

Category 4: Other individuals who do not meet one of the other criteria but do meet one of the following: Other families requiring services or housing assistance to prevent homelessness and at great risk of housing instability

Currently, the State of Utah has multiple funding sources and programs that can assist individuals in Category 4. Programs such as Emergency Rental Assistance, Emergency Solutions Grant and State funded Homeless Prevention, Low Income Housing Tax Credit Properties, naturally occurring affordable housing, and accessory dwelling units are examples of existing resources. Additionally, faith groups play a role in Utah in providing short term rental subsidies for severely cost burdened and those at great risk of housing instability.

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

Category 1: Individuals that are literally homeless, as defined by Federal Code 24 CFR 91.5

The Point in Time Count, Housing Inventory Count, and Utah Affordable Housing report were all utilized in the analysis of housing inventory and shelter bed gaps. Every community consulted and reviewed showed an affordable housing gap, with the estimated statewide need at approximately 50,000 units. This gap extends to homeless-dedicated and supportive housing units. Additionally, providers in large metropolitan areas identified the lack of supportive housing case management as an additional gap for qualifying populations. All permanent housing project types dedicated to serving those leaving literal homelessness reported 92% or higher utilization rates on the 2022 HIC, making it impossible for those resources to house everyone currently experiencing homelessness.

The 2020, 2021, and 2022 Point-in-Time Counts and Housing Inventory Counts also demonstrate that there are not enough emergency shelter beds in the state to meet the needs of all those in need of shelter on a single night. The 2022 counts showed that 81% of the current supply was occupied on that night in January. If every bed had been occupied, there still would have been at least 338 people who were unsheltered that night who would not have had access to a shelter bed. The deficit is higher when the ability of those experiencing unsheltered homelessness to access beds dedicated to youth and domestic violence survivors is considered in the analysis, with 89% of undedicated beds being full and the majority of the unsheltered population not qualifying for a bed dedicated to specific subpopulations. The COVID-19 pandemic has revealed the limits of the congregate shelter facilities that make up the vast majority of Utah's emergency shelter supply, with many needing to reduce capacity in order to enact COVID-19 safety measures at various points in recent years.

The need for emergency shelter impacts all three of Utah's CoCs, but is especially stark outside of Salt Lake County. Eight of the thirteen local homeless councils (LHCs) in Utah, all of which are in the Mountainland and Utah Balance of State CoCs, do not currently have a year-round shelter facility that is able to serve anyone experiencing homelessness. As a result, these areas have to rely on hotel vouchers or transport households to other parts of the state in order to meet the shelter needs of their residents. Neither option is ideal, as relying on hotels results in high costs and is subject to limited availability, particularly in rural areas with thriving recreation and tourism industries, while forcing individuals to seek shelter elsewhere imposes additional burdens and barriers on those already coping with the harsh realities of experiencing homelessness.

Category 2: Individuals at risk of becoming literally homeless, as defined by Federal Code 24 CFR 91.5

Individuals and households in this category do not have an unmet shelter need, as they will move to another category before accessing shelter. The most recent Utah consolidated plan identified 64,663 households as having one or more housing problems, which are defined as: 1. Lacks complete kitchen facilities, 2. Lacks complete plumbing facilities, 3. More than 1.5 persons per room, 4. Cost burden over 50%. This data suggests that these households are at risk of becoming homeless and have an unmet need for safe, affordable housing. The 2020 State of Utah Affordable Housing Report shows a deficit of 40,725 rental homes affordable and available for extremely low-income renters and that 72% percent of extremely low income renter households are severely cost burdened.

Category 3: Individuals fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

In addition to facing the same overall gaps experienced by those who are literally homeless or at risk of literal homelessness, individuals fleeing or attempting to flee domestic violence also face a scarcity of shelter and housing resources dedicated specifically to meeting their unique needs. Utah is home to 14 emergency shelters dedicated to those fleeing domestic violence serving 29 counties, which forces many individuals in this category to travel long distances in order to access projects that meet their safety and services needs. The shelter beds currently available in domestic violence service providers are not sufficient to meet the current needs of those fleeing domestic violence. DHHS reported that Utah's domestic violence service providers were unable to meet 3,916 requests for shelter during 2021. The 2022 HIC also showed only 152 beds in housing projects, 5 in permanent supportive housing beds and 147 in rapid rehousing beds, are dedicated to this population. These numbers fall well below the number of people fleeing domestic violence on that same night.

Category 4: Other individuals who do not meet one of the other criteria but do meet one of the following: Other families requiring services or housing assistance to prevent homelessness and at great risk of housing instability

Individuals and households in this category do not have an unmet shelter need, as they will move to another category before accessing shelter. According to the American Community Survey, in 2020 there were 94,162 vacant units in Utah. This suggests that although physical housing inventory exists, the units are not accessible or affordable. This could also indicate gaps in the service delivery system that connects households that are severely rent burdened with affordable housing units. The gap in affordable housing units continues to grow according to all available measures and feedback from those consulted in regards to HOME-ARP funding. Additionally, Utah is considered by national housing experts to be experiencing one of the most severe rental price increases in the United States. This will continue to create households who are severely rent burdened and at greater risk of homelessness.

Priority needs for qualifying populations

Category 1: Individuals that are literally homeless, as defined by Federal Code 24 CFR 91.5

During the consultation process, it was identified by all partners that those meeting the first qualifying population criteria of literal homelessness were the highest need of the qualifying populations listed in the HOME-ARP notice. As a result, The State of Utah is not proposing setting aside a portion of its allocation for any specific homeless subpopulations, although projects dedicated to serving subpopulations of those experiencing literal homelessness, such as survivors of domestic violence and veterans, would still be eligible to apply. The top priority identified in consultation with providers, partners, and available data was the creation of new, deeply affordable housing. Second was the need for additional non-congregate shelter options, especially in rural areas that do not have any available crisis shelter.

Category 2: Individuals at risk of becoming literally homeless, as defined by Federal Code 24 CFR 91.5

The highest priority need for this qualifying population is access to affordable housing and supportive services. This category does not have a high need for shelter, unless they move from category 2 into category one, literal homelessness.

Category 3: Individuals fleeing or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

The highest priority needs for these individuals are affordable housing and non-congregate shelter. Capacity building was also identified as a priority need for domestic violence service providers.

Category 4: Other individuals who do not meet one of the other criteria but do meet one of the following: Other families requiring services or housing assistance to prevent homelessness and at great risk of housing instability

The highest need for this qualifying population is affordable housing, as indicated by the gaps identified in this allocation plan surrounding safe, accessible affordable housing. Increased capacity of nonprofits in the area of development of affordable housing is also required to create affordable housing units in rural areas.

HOME-ARP Activities

Anticipated method for soliciting applications for funding and/or selecting developers, service providers, sub-recipients and/or contractors

The State of Utah will not carry out any activities directly. The State of Utah will solicit applications for funding through a request for grant application (RFGA) process, score and prioritize applications, and will select developers, service providers, and subrecipients to carry out activities. Contracts for funding will be overseen by the State of Utah Office of Homeless Services (OHS). OHS will consult with Local Homeless Councils, other participating jurisdictions who were awarded HOME-ARP funding, and the Utah Homeless Network to determine specific projects to award funding in each area of the State.

Funds will be distributed via grants from the State of Utah to the awarded applicants. Funding will not be distributed through a specific formula or have requirements for amounts to specific areas. Funding will be reviewed according to the strength of application and need of the community, along with priorities of the Local Homeless Council.

During this RFGA process, preference will be given to projects located in areas of the state that do not already have access to HOME-ARP funds via other participating jurisdictions. Projects in all areas of the state will still be eligible and considered in the RFGA process.

This RFGA process will also award higher scores for projects that serve category one, literal homelessness. All other qualifying populations will still have access to projects and will be considered in the RFGA process.

Proposed Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 973,403.80		
Acquisition and Development of Non-Congregate Shelters	\$ 5,840,422.80		
Tenant Based Rental Assistance (TBRA)	\$ 0.00		
Development of Affordable Rental Housing	\$ 2,920,211.40		

Non-Profit Operating	\$ 648,935	5%	5%
Non-Profit Capacity Building	\$ 648,935	5%	5%
Administration and Planning	\$ 1,946,807	15 %	15%
Total HOME ARP Allocation	\$12,978,715		

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

Utilizing existing data from HMIS and HUD, there is a demonstrated gap in shelter and housing in every Local Homeless Council (LHC) in Utah. The affordable housing deficit in Utah continues to grow and the real estate market is among the fastest growing in the country. Additionally, the Point in Time count conducted each year shows a growing gap between those seeking shelter and the number of beds available. With this information, it was determined that each area of the State has sufficient need to improve both shelter and housing inventory, if available resources exist both politically and fiscally.

When considering the process of selecting individual projects for funding, priority will be given to projects that are not eligible for HOME-ARP from other participating jurisdictions, followed by those that have already secured funding from other sources, including other PJs’ HOME-ARP. Consideration will also be given to the needs of the area and the proportion of the available HOME-ARP funding that is being utilized in a particular LHC. Hard caps on funding for a given project or LHC are not being suggested at this time, but may be considered in the future.

Given the current focus on affordable housing and multiple funding streams being pursued to address that need, greater focus is given to the unique activity available through HOME-ARP of acquisition and development of non-congregate shelter. The Point-in-Time count conducted each year justifies this focus and highlights the need for a larger, more diverse emergency shelter inventory throughout the state.

Proposed funding for Supportive Services, Development of Affordable Rental Housing, and Acquisition and Development of Non-Congregate Shelter was determined via a formula based on priorities identified during the gap analysis and consultation process.

HOME-ARP Production Housing Goals

Estimated number of affordable rental housing units for qualifying populations produced or support with HOME-ARP allocation

With the amount of money proposed to be used for affordable housing, it is estimated that 45 units of affordable housing will be created. This is assuming that funding will not entirely fund the creation of affordable units, or that rehabilitation will be limited to \$65,000 per unit. This is only an estimation and does not include any housing accessed through supportive services.

This goal of the creation of 45 new or newly affordable housing units is small compared to the overall need in the State. By targeting these units in areas that are not normally focused on for affordable housing development, and where the need is smaller than in large population centers, this will create a much larger

impact. Additionally, these 45 units could encourage other development in these areas and prove the feasibility of pursuing affordable units in rural areas.

All qualifying populations have significant gaps in affordable housing need. The affordable housing gap for all qualifying populations exceeds the amount of housing that could be produced by this funding, given the current costs of housing production and high demand for development of all types of housing in Utah. This estimate of the number of units produced will serve all qualifying populations.

This creation goal correlates to the gaps identified for all qualifying populations in regards to affordable housing. Although it represents an extremely small portion of the overall need, it does represent a reasonable and attainable goal for the funding in this allocation plan identified for affordable housing development.

Preferences

The State of Utah intends to give preference with HOME-ARP funding to Category 1: Individuals that are literally homeless, as defined by Federal Code 24 CFR 91.5. This was the highest need population identified during the consultation process and a focus for the State of Utah.

By utilizing a preference for Category 1 households, this funding will address the highest priority identified through consultation with the agencies listed in CPD Notice 21-10 and from public comment. This preference is consistent with the Needs Assessment and Gap Analysis section of the plan. The gaps identified for the Category 1 population are sufficiently large to utilize all funding in the proposed use of HOME-ARP funding section.

All other qualifying populations will be eligible for projects funded by HOME-ARP and will have access on a first come, first serve basis.

Referral Methods

Specific Continuum of Care (CoC) coordinated entry policies and procedures will be involved in the referral process for projects, but will not be the sole source or required source of referrals in order to ensure all qualifying populations have access to funded projects. The State of Utah will work with each CoC to coordinate and integrate projects into the existing coordinated entry system as needed. Referrals for applicants will be outlined in each project's application for funding and award contract, in coordination with the Local Homeless Councils existing methods.

Limitations in a HOME-ARP rental housing or NCS project

The State of Utah does not intend to create limitations for HOME-ARP funding in rental housing or NCS projects.

HOME-ARP Refinancing Guidelines

The State of Utah does not intend to use HOME-ARP funding to refinance existing debt of the project.