

Date May 9, 2022

**APPROVAL AND SUBMISSION OF THE
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD)
HOME INVESTMENT PARTNERSHIPS PROGRAM – AMERICAN RESCUE PLAN ALLOCATION PLAN
(HOME-ARP)**

WHEREAS, on March 11, 2021, President Biden signed the American Rescue Plan Act of 2021, Public Law number 117-2 (“ARP”) into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic on the economy, public health, State and local governments, individuals, and businesses; and

WHEREAS, the ARP appropriated \$5 billion to help communities provide housing, shelter, and services for people experiencing or at-risk of homelessness; and

WHEREAS, on April 28, 2021, HUD notified the City of Des Moines (“City”) that the City would receive a HOME-ARP allocation of \$3,556,317.00; and

WHEREAS, on October 18, 2021 by Roll Call No. 21-1563, Council approved the HUD-ARP grant agreement with HUD; and

WHEREAS, up to 15 percent, or \$553,447.55, of the allocation may be used for administrative and planning costs of the City, and up to 5 percent, or \$177,815.85, of the allocation may be used for operating costs of other non-profit organizations, including homeless providers; and

WHEREAS, the remaining 80 percent, or \$2,845,053.60, must be used for four eligible activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations; and

WHEREAS, HOME-ARP funds can be used for four eligible activities including the production or preservation of affordable housing; tenant-based rental assistance; supportive services, including homeless prevention services and housing counseling; and the purchase or development of non-congregate shelter for individuals and families experiencing homelessness; and

WHEREAS, HOME-ARP funds must be used for individuals and families who are experiencing homelessness; are at risk of homelessness; are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; are a part of other populations where aid would prevent homelessness; and veterans and families that include a veteran family member who meet one of the previous criteria; and

WHEREAS, provisions under HUD’s Community Planning and Development (CPD) Notice 21-10 regarding requirements for use of funds in the HOME-ARP Program require the City to submit a HOME-ARP allocation plan to HUD as a substantial amendment to its Fiscal Year 2021 Annual Action Plan; and

★ **Roll Call Number**

Agenda Item Number

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Date May 9, 2022

WHEREAS, following guidelines from CPD Notice 21-10, City of Des Moines staff developed a draft HOME-ARP allocation plan using consultations and data from the Polk County Continuum of Care, Des Moines Municipal Housing Agency, Des Moines Veterans Administration, and other local homelessness or at-risk populations service providers; and

WHEREAS, the City Council must conduct a public hearing to review the HOME-ARP allocation plan and receive citizen comments regarding the plan prior to submission, and provide notice of the hearing to be published with reasonable notice before it is held; and

WHEREAS, on March 21, 2022, by Roll Call No. 22-0416, in compliance with the HUD regulations, the City Council set a public hearing for April 18, 2022 at 5:00 p.m. to obtain citizen comments regarding the HOME-ARP Allocation Plan; and

WHEREAS, on April 18, 2022, by Roll Call No. 22-0634, the public hearing was held and Council conducted discussion of the Allocation Plan; and

WHEREAS, on April 18, 2022, the City Council determined that the public hearing, discussion and vote regarding approval of the HOME-ARP Allocation Plan would continue on the council meeting scheduled for 5:00pm on May 9, 2022.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Des Moines, Iowa, that:

1. All public comments regarding the HOME-ARP Allocation Plan have been received and the hearing is hereby closed.
2. The HOME-ARP Allocation Plan, on file with the City Clerk and by this reference made a part hereof, is hereby approved.
3. The City Manager or their designee is hereby authorized and directed to submit the HOME-ARP Allocation Plan to the U.S. Department of Housing and Urban Development.

(Council Communication 22-211)

★ Roll Call Number

Agenda Item Number

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Date May 9, 2022

Moved by _____ to adopt,

Seconded by _____

FORM APPROVED:

/s/ Gary D. Goudelock
Gary Goudelock, Assistant City Attorney

COUNCIL ACTION	YEAS	NAYS	PASS	ABSENT
COWNIE				
BOESEN				
GATTO				
MANDELBAUM				
SHEUMAKER				
VOSS				
WESTERGAARD				
TOTAL				
MOTION CARRIED			APPROVED	
_____ Mayor				

CERTIFICATE

I, P. KAY CMELIK, City Clerk of said City hereby certify that at a meeting of the City Council of said City of Des Moines, held on the above date, among other proceedings the above was adopted.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal the day and year first above written.

_____ City Clerk

HOME-ARP
Home Investment Partnerships American Rescue Plan Program
Funding Allocation Plan
May 2022

City of Des Moines HOME-ARP Allocation Plan

Participating Jurisdiction: City of Des Moines

Date: 5/9/22

Consultation

Summarize the Consultation Process:

The City of Des Moines Neighborhood Services Department continually meets with partners with non-profits, intergovernmental agencies, and homelessness service providers to determine the allocation of its various federal funds, including CDBG and HOME. City staff sought to do the same based on the expected HOME-ARP procedures, including the types of organizations consulted, types of questions asked during consultations, and public comment period.

The consultation began in early November 2021 with staff attending a monthly meeting of the Polk County Continuum of Care, also known as Homeward, Executive Directors Council to discuss the funding and prioritization of activities with leadership of various homeless service providers and non-profits who serve homeless individuals and households. The needs of the qualifying populations and gaps in services were discussed, as well as the best use of the HOME-ARP funds to address homelessness in the City. A brief allocation exercise was also done to help inform the level of HOME-ARP funding allocation for each eligible activity.

During the winter of 2021 and 2022, consultations with specific homelessness service agencies continued primarily through email correspondence and virtual meetings. Some agencies were present at the Homeward Executive Directors Council meeting in November and then followed up with through one-on-one discussions. Needs of the qualifying populations, in the context of those who the agency specifically serves or has programs for, were discussed. Agencies often provided additional data or internal research/publications to inform this plan.

There were also extra consultations which occurred, beyond the required organization types required by the HOME-ARP notice. This included a staff presentation to the United Way OpportUNITY Housing group, which included agencies present already at the Homeward Executive Directors Council or as individual consultations, but also other homelessness-adjacent agencies and developers. Input on the needs of qualifying populations and best use of HOME-ARP funds were largely reiterated at this event. HOME-ARP funding was also discussed during a monthly meeting with HOME, Inc., a local non-profit developer of affordable housing and Community Housing Development Organization (CHDO), to gather input on the changing housing market and the needs of those at the greatest risk of housing instability.

Consultation agencies, methods, and feedback summaries are described in Table I below. These consultations formed the basis of the narrative responses to sections within this allocation plan.

The City will continue to discuss with organizations, both previously consulted and new, during the implementation of the HOME-ARP activities to continually improve and respond to changing needs of the community.

List the Organizations Consulted, and Summarize the feedback received from these entities

Table I: List of Organizations Consulted

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<p>Homeward Executive Directors Council</p> <p>Represented Agencies: Homeward, Anawim Housing, Beacon of Life, Catholic Charities, HOME Inc., Institute for Community Alliances, Primary Health Care, Des Moines Veterans Administration</p>	<p>CoC; Homeless Service Providers; Public Agencies that address the needs of the qualifying populations</p>	<p>Small group discussion with Directors and Staff of local and regional service provider agencies. Included activity allocation exercise</p>	<p>Discussed HOME-ARP funding background, eligible activities, and the target populations. Particularly with an emphasis on populations who have been hard to reach with traditional ESG funding. Discussions also included using funding to prioritize housing families currently in the homelessness pipeline or at risk of housing instability. Difficulty of placing homeless individuals in traditional rental housing due to tenant selection processes was also discussed. A brief activity helped to inform the expected allocation of HOME-ARP funds. Feedback from this group as well as follow-up discussions with individual organizations informed the bulk of the allocation plan narrative.</p>
<p>Des Moines Municipal Housing Agency (DMMHA)</p>	<p>Public Housing Agency serving the geographic area</p>	<p>Inter-departmental Remote Meeting</p>	<p>Discussed current issues that the agency is seeing with getting individuals into housing. Included difficulties based on the lack of affordable housing, high rents, supportive needs of very-low-income households, and difficulty with tenant selection/application processes.</p>
<p>Children and Families of Iowa (CFI)</p>	<p>Housing Service Provider – Victim Services</p>	<p>Email Correspondence</p>	<p>Discussed the lack of services related to the different layers of assistance that victims of domestic violence need. Primarily this was mental health related services, especially the care that victims of domestic violence need until they are stabilized. Identified gaps in services included lower staff numbers among agencies and associated programmatic shortfalls as a result.</p>
<p>Des Moines Veterans Administration (VA)</p>	<p>Housing Services Provider – Veteran Services</p>	<p>Inter-agency Remote Meeting</p>	<p>Discussed services provided by the VA. Identified unmet housing services included an emphasis on making affordable housing low-barrier for entrants. Mental health and aging veterans were identified as key issues, as</p>

			well as those with mobility/ADL issues and those needing some in-home care services.
IMPACT Community Action Partnership	Housing Service Provider	Email Correspondence	Emphasis on the lack of income to make housing truly affordable and the need for subsidies due to increasing costs of housing. Barriers due to age, disabilities, and mental health were also reiterated. IMPACT administers the rental assistance programs and cites a lack of housing stock and amount of assistance as a prevailing issue.
United Way OpportUNITY Housing Group	Housing Service Providers and private organizations that address the needs of the qualifying populations	Steering Committee presentation and discussion	Meeting with housing planning focused working group. Topics of note included a need for current and future refugee housing, ensuring affordable housing occurs close to bus stops and basic services, and the use of funds for rehabilitation.
HOME. Inc.	Local Non-Profit Developer	Monthly Meeting	Discussion of the rental housing market in Des Moines and setting expectations of rental housing developments which can target qualifying populations.

Public Participation

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:

The public comment period for the HOME-ARP Allocation Plan took place between April 1 and April 18, 2022. A public notice was published in the *Des Moines Register* on April 1. This notice detailed the purpose of the HOME-ARP program, allocation plan, and the date of the public hearing. The Allocation Plan draft was hosted on the city website and made readily available at City Hall, all branches of the Des Moines Public Library, and Amory building where Neighborhood Services Department is housed.

Translated versions of the allocation plan were made available upon request at the Neighborhood Services office. Languages included: Spanish, Lao, Hmong, Bosnian, Arabic, Simplified Chinese, Amharic, Pashto, and Swahili.

The public hearing for the HOME-ARP allocation plan took place on April 18, at 5:00 p.m. during the regular City Council meeting at the Council Chambers, City Hall, 400 Robert D. Ray Drive, Des Moines, Iowa 50309. Public comments were submitted via mail, email, or fax to the Office of the City Clerk. [Hold for number of comments received and summary of public hearing]

At the public hearing, the City of Des Moines followed applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodations for persons with disabilities or to provide meaningful access to participation by limited English proficient (LEP) residents as outlined in the City's current citizen participation plan. Assistance for those with disabilities was provided at City Hall, including handicap accessibility, and Assistive Listening Devices in Council Chambers.

Describe any efforts to broaden public participation:

Most of the outreach to qualifying populations overlapped with City staff's consultation with local service providers. More details on how each qualifying population were addressed are below.

Homeless populations

Various homeless service providers were consulted as a part of this consultation. These were done both in in-person settings such as the CoC, individual email correspondence, and virtual meetings.

Additionally, discussion topics were sent in advance to provider leadership, who then were able to ask program staff who work directly with the populations for their input, providing direct insight on some of the needs and priorities of the serviced populations.

At-risk of homelessness

Service providers were also familiar with those who are at-risk of homelessness and the conditions associated with housing instability, and consultation topics also included these households in addition to those within the homeless system.

Notably for this group, the United Way OpportUNITY group included public and private advocacy organizations who could discuss households who may not be homeless but are very low income or have other characteristics that put them at-risk of homelessness. Discussions with HOME, Inc. revolved around how to best fund housing for those with very-low incomes.

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

The primary group consulted for this qualifying population was Children and Families of Iowa. Other service providers discussed their family services and noted on the needs of single mothers or those who are transitioning from safe shelter to independent living.

Other populations

A question specifically asking about other populations which have been difficult to serve with current programming or resources was asked during the CoC discussions and individual discussions with other providers. The Des Moines Veterans Administration office, Central Iowa Center for Independent Living were also individually consulted.

Summarize the comments and recommendations received through the public participation process

A citizen comment received during the public hearing on 4/18/22 stated that it was disappointing to see that the maximum amounts were allocated for administration expenses, and that there was no allocation for rental-based tenant assistance.

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

N/A

Needs Assessment and Gaps Analysis

The two tables below were included by recommendation of HUD in the publication of their HOME-ARP allocation plan template. Table II includes data from the 2020 HUD Continuum of Care Homeless Assistance Programs Housing Inventory Count (HIC) and Point in Time Count (PIC) for Homeward. Both reports are attached with this submission and detail the estimated number of homeless persons sheltered or unsheltered and the number and availability of beds within the homeless services system. See attachments HIC 2020 and PIC 2020.

Table III data uses the 2014-2018 Comprehensive Housing Affordability Strategy (CHAS) dataset for the City of Des Moines, which reflects housing units, income characteristics of the households who occupy them, and the physical characteristics of those units.

Both tables represent *best estimates* based on the conditions at the time of collection. For the purposes of this allocation plan, they are used to provide context to the consultations, narrative, and HOME-ARP allocation determination within this plan.

Table II: 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 Beds	# of beds					# of Units	# of Beds	# of Units	
Emergency shelter	49	122	310	17								
Transitional Housing	37	16	144	14								
Permanent Supportive Housing	164	48	333	165								
Other Permanent Housing	134	31	53	12								
Sheltered Homeless					111	405	46	41				
Unsheltered Homeless					0	123	13	18				

Sources: 2020 PITC and 2020 HIC for Polk County/Des Moines CoC

Table III: Housing needs inventory and gap analysis

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	33,905		
Rental Units Affordable to HH at 30% AMI (At Risk of Homelessness)	9,730		
Rental Units Affordable to HH at 50% AMI (Other Populations)	7,100		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		11,420	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		8,860	
Current Gaps			3,450

Sources: 2014-2018 Comprehensive Housing Affordability Strategy (CHAS)

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

Homeless Populations

Homeward, the CoC for Polk County and the City of Des Moines, provides a dashboard which tracks demographic data for the homeless population within the Polk County and the City of Des Moines. Between January 2021 and January 2022, across all providers, there was an estimated 6,382 clients served. Of them, 27% of them exited services with a permanent destination and 6% returned to homelessness. Around 11% were considered chronically homeless, and 10% were veterans. 12% were Latino.

HMIS reports from the Institute of Community Alliances also found similar trends on the homeless population. Among their recent estimate of homeless persons between October 2020 and October 2021 of 2,348, nearly half, or 1,031 of those were Black, African American, or African. This overrepresentation was affirmed in later consultations as a systemic issue not unique to our area but is a pervasive issue, nonetheless. About 439 homeless youth under 18 were counted. There were also around 91 homeless persons above the age of 65.

Between January 2021 and January 2022, an estimated 569 previously homeless households exited the system into some form of permanent housing. There were 78 returns to homelessness from permanent housing during this same time, highlighting the housing instability associated with recent exits from homelessness into permanent housing.

At-risk of homelessness

One way to estimate the size of those who are at risk of housing instability is through the ratios of income to housing costs. According to 2020 5-year American Community Survey estimates, there were 34,632 renter-occupied housing units in the City of Des Moines. Of those, 90.8% of renting households who earn less than \$20,000 a year and 76.6% of renting households who earn between \$20,000 and \$34,999 pay more than 30% of their monthly income on housing costs. When examining all income groups together, 47.3% of renting households exceed the 30% threshold.

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

According to the Iowa Uniform Crime Reporting System, in 2020 there were 593 victims of domestic abuse reported by the Des Moines Police Department. Of these, 78% were female and 22% were male. There were 146 victims reported by the Polk County Sheriff's department. There were also no recorded offenses or charges related to human trafficking in either department. However, in both cases, sexual and domestic violence, including trafficking, may often be underreported.

While it may be difficult to determine the exact number of those who may be fleeing domestic violence etc., the 2020 Point in Time Count for Polk County listed 59 victims of domestic violence within the homeless system during the time of count. Of those 35 were in emergency shelter, 6 were in transitional housing (including Safe Haven programs), and 18 were unsheltered.

Other Populations

During consultations, questions were asked about the characteristics of those who are hardest to serve and any special populations currently being underserved. From those discussions, other populations included families, individuals exiting prison, refugees, and sex-offenders. Families often fit into other qualifying populations, however they were identified as a population that have unique needs that aren't met. The 2020 Point in Time Count estimates 111 persons with at least one adult and one child. While none of these families were unsheltered at the time of the count, it is a goal of service providers to get these families into permanent housing.

Other special populations at-risk of homeless can difficult to estimate. United Way of Central Iowa estimates that around 5,000 citizens return to neighborhoods in Iowa after serving time in state prisons. Homeward members estimated they serve around 600 individuals who are re-entering from the prison system but are need homeless related services or shelter each year. According to the 2020 American Community Survey 13% of the population of the City of Des Moines are foreign born. This has increased from 10% since 2010. Of the foreign-born population, 6% are from Europe, 36% from Asia, 21% from Africa, and 37% are from Latin America. Additionally, the U.S. Committee for Refugees and Immigrants has helped at least 4,000 refugees settle in Central Iowa since 2010, primarily from Afghanistan, Myanmar, the Democratic Republic of the Congo, Eritrea, Iraq, Somalia, Sudan, and Syria.

Veterans comprise of 6% of the civilian population over the age of 18 in the City of Des Moines Des Moines. Of them, 46% are over the age of 65, 10% had incomes below the poverty level, and 31% had disabilities.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- Sheltered and unsheltered homeless populations;
- Those currently housed populations at risk of homelessness;
- Other families requiring services or housing assistance or to prevent homelessness; and,
- Those at greatest risk of housing instability or in unstable housing situations:

Homeless populations

Housing Needs

The primary unmet housing needs for homeless populations include:

- Increased number of affordable units and
- Increased availability of rental assistance.

Using the 2020 Point in Time Count for the Des Moines/Polk County CoC, at the time of the count, there were 646 estimated homeless households. Of those, 130 were unsheltered, 96 were in transitional housing, 295 were in the emergency shelter, and 14 were in Safe Haven. Ideally, there would be a reliable pipeline to get those experiencing homelessness – whether they are sheltered, unsheltered, or uncounted – into permanent housing. During consultations, it was expressed that while a lot of supply-side issues exist with the availability of affordable housing, it is also the case that many individuals experiencing homelessness have other needs in addition to income or available housing stock.

Multiple consultation partners who provide rental assistance report that even with Social Security income or disability benefits, extremely low-income individuals cannot afford market rate apartments and must turn to voucher-based assistance, or the very limited supply of naturally occurring affordable housing.

Service Needs

The primary unmet service needs for homeless populations include:

- Mental health
- Transportation and access to services

The primary unmet service needs for homeless populations include:

- Mental health
- Transportation
- Culturally specific services

Mental health was continually brought up during discussions with service providers as one of the biggest unmet service needs. While the quality of this service is not lacking, there are concerns about turnover and availability of services, especially amidst the pandemic.

Partners also listed transportation and access to services as a need for homeless populations. Shelter facilities in Des Moines are in areas with access, however there are still challenges in ensuring that homeless populations can safely get to the services they need. Both mental health services and transportation were consistently identified as needs, across all qualifying populations.

The need for language and cultural services tailored to immigrant populations was expressed by refugee advocacy groups. Culturally specific services are lacking in both the shelter system and when agencies work to house at-risk households or refugee families.

At-risk of homelessness

Housing Needs

The primary unmet housing needs for at-risk of homeless populations include:

- Quality housing with sufficient components or systems.

Further analysis of other qualifying populations is estimated in the CHAS study, detailed in Table III. There are an estimated 11,420 households who are currently housed but may be at risk of homelessness because they earn less than 30% of the Area Median Income (AMI) and have one or more housing problems (incomplete kitchen facilities, incomplete plumbing facilities, more than 1 person per room, or cost burden greater than 30%). In addition to those, there may be an additional 8,860 households who are still below 50% AMI, but also have a risk of housing instability due to housing problems. Something to note is that these numbers do not account for those who are in unstable housing situations due to social conditions, who may be hard to accurately count but are at risk of housing instability nonetheless. Lastly, neither of these are exact estimates, and may further be undercounted due newer problems related to the COVID pandemic.

Service Needs

The primary unmet service needs for at-risk of homeless populations include:

- Issues related to the COVID-19 pandemic

Many of the service needs for the homeless populations were the same for those at-risk of homelessness. Specifically, mental health was again identified as an unmet service need for those at-risk of homelessness. For those at-risk this has been exacerbated by the COVID-19 pandemic, as incomes are often too low to receive services. Landlord-tenant issues were also identified as a common issue, including evictions, and tenant-selection practices.

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

Housing Needs

The primary unmet housing needs for those fleeing domestic violence include:

- Housing stock, safety, and affordability.

Like many of the other qualifying populations, the need for affordable housing for those fleeing or attempting to flee domestic violence was described as a top need. This includes a need of availability of apartments that could be deemed safe and provide an environment for which victims can both be cared for and care for themselves until they are stabilized.

Service Needs

The primary unmet service needs for those fleeing domestic violence include:

- Mental health care and staffing as it relates to trauma.

Service providers reported that there are often intersections of needs for those who are fleeing domestic violence. Most often this is an ongoing need for mental health services. Again, mental health services can assist victims while they are getting into more stable environments. A lack of staff was also identified as a major gap in the service delivery system. Less bodies make it difficult to accommodate training needs, data collection, collaboration, and facilitate client centered groups and activities.

Other populations

Other families requiring services or housing assistance to prevent homelessness

The primary unmet housing needs for families include:

- Production and availability of housing units with an adequate number of bedrooms and
- Cost of larger units when enough bedrooms are present.

While the 2020 Point-in-Time results listed zero families as being unsheltered at the time of the count, consulted service providers who serve families reported that they do indeed regularly service families. During a meeting with Homeward, it was expressed that with the right funding to develop housing large and safe enough, homelessness among families could effectively be ended for the City.

During the consultation process, several agency representatives indicated many families, especially female-head-of-households or immigrant and refugee populations, need units with three or more bedrooms. Larger apartment units were harder to come by, and when these larger units are available, they are also naturally more expensive. This creates a higher likelihood of families being cost-burdened in order to not be overcrowded.

Veterans and families that include a veteran family member

In 2016, the CoC announced an end to veteran homelessness. While there may be veterans counted in any given Point in Time Count, veteran homelessness remains at an effective zero, as every identified homeless veteran has had services and housing made available to them and the inflow of homeless veterans equals the outflow. The VA still administers and case manages veteran services through HUD-VASH, and there are 19 designated veteran beds at CISS.

Consultation partners identified mental health services as a major gap for both veterans and victims of domestic violence. Both populations often need ongoing mental health services and mental health and trauma often compound other issues typical on housing instability such as lack of income, social networks, poor rental history, etc. A high turnover rate and lack of staff in the service delivery system in general was also cited as a major gap that affects all populations, but especially those who need populations who require well trained staff and case managers.

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:

The following programs and resources are currently available to assist qualifying populations:

- Emergency Solutions Grant (ESG), available from the City of Des Moines;
- ESG funds from the Iowa Finance Authority (IFA);
- Continuum of Care (CoC) grant funds, for Rapid Rehousing, Permanent Supportive Housing, and Transitional Housing in Des Moines and Polk County;

- Primary Health Care is the Centralized Intake provider for the area, and assist with housing placement, case management, and financial consultation;
- Des Moines Municipal Housing Authority oversees public housing, as well as the following programs which assist the qualifying populations:
 - o Section 8 Housing Choice Voucher and Project Based Vouchers program
 - o Family Self-Sufficiency Program
 - o Family Unification Program
- Emergency Rental Assistance Program (ERAP), received by both the City of Des Moines and Polk County from the US Treasury, is administered by IMPACT Community Action Partnership;
- Tenant-Based Rental Assistance (TBRA) funded by IFA is available through IMPACT and Anawim Housing.

Transitional Housing family units and adult-only beds are at Beacon of Life, Hope Ministries, and Iowa Homeless Youth Centers. Permanent Supportive Housing family units and adult-only beds are available at Anawim Housing and the VA of Central Iowa. Central Iowa Shelter and Services, Primary Health Care, Hawthorn Hill, the YMCA, Catholic Charities, Hope Ministries, Children and Families of Iowa operate emergency shelter and rapid rehousing programs. Numbers of beds and units are estimated in the annual Point in Time County and summarized in Table II.

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

The HMIS utilization report lists that the average utilization for those in the homelessness system for Rapid Rehousing and Other Permanent Housing were 100% and 97%, respectively. While this high rate implies that getting individuals into housing is prioritized, it also implies that available permanent housing options are limited and exhausted. Consultation partners also have noted that it is difficult to place homeless individuals and families into permanent housing due to compounding applicant needs described previously, but also there are issues related to tenant applications such as a lack of financial history, rental history, bank statements, and credit. Not only are there few affordable rental options for those exiting homelessness, but there are few landlords willing to rent to homeless or very low-income individuals.

Adding to this, waitlist applications have been high in numbers and long in wait times. Moving estimates from the Des Moines Municipal Housing Authority (DMMHA) were around 2,000 for the regular non-elderly Section 8 vouchers with a wait time of at least six to nine months. The elderly waiting list was about 40 with a wait time of four to six months. Additionally, there is no waiting list for the Project-Based Vouchers (PBV). Staff reported that this was due to a lack of available units for which PBV could be used for, suggesting that there are so few eligible units and such low turnover that it may be better to administer the vouchers on a case-by-case basis.

A major gap in housing inventory expressed by consultation partners was the lack of larger rental units for families. In addition, the unavailability to units suitable to families, larger families have a risk of housing instability due potential overcrowding situations (>1.5 persons per room). Overcrowding may also have negative effects on family dynamics, where children, adolescents, and adults cannot have their own privacy due to a lack of space. Lastly, among existing units large enough for families, many are unaffordable to households with even two income-earners.

During the Continuum of Care meeting, certain populations were brought up as hard to house and with needs that are often unmet by existing services and the housing market. There are currently no voucher-eligible affordable housing options for which sex offender registrants can live in due to 2,000-foot proximity requirements. Because of this, homeless sex offenders are often told that they must live shelterless. Another population overlooked have been those exiting the prison system and reentering society. Reentrants often have no income, no recent employment history, or get denied by landlords, requiring extensive case management in addition to an actual place to live.

Refugees were also cited on more than one occasion as being a population at risk of housing instability. In particular, the City is currently home to a large number of East African and Southeast Asian refugees and expects an uptick in Afghan and Eastern European refugees due to recent world events. While there are many non-profit advocacy groups and NGOs that help in the service delivery to integrate refugees, the availability of not only affordable, but suitable housing stock is a concern. The need for livable and larger units to accommodate families discussed previously often applies to these families, as does the question of the amount of available stock.

Identify the Characteristics of Housing Associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

While the City of Des Moines does not intend to direct any type of project application for the use of HOME-ARP funds over another, it is the intent to be flexible with our distribution of HOME-ARP funds. The City of Des Moines will allow other populations to be served with its HOME-ARP funds, consistent with the HOME-ARP notice. More specifically they include:

- 1) *has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs);*
- 2) *has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:*
 - i. *Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;*
 - ii. *Is living in the home of another because of economic hardship;*
 - iii. *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;*
 - iv. *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;*
 - v. *Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;*

- vi. *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*
- vii. *Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan*

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

If the populations meet these definitions, characteristics of housing associated with instability and increased risk of homeless could include households discussed previously in this plan, such as refugees, sexual offenders with no other housing options, those exiting the prison population, veterans or disabled.

Identify priority needs for qualifying populations

Homeless populations

The priority need identified for homeless populations is development of affordable housing. The Polk County CoC and homeless service providers have committed to a Housing First paradigm. This is the idea that permanent housing should be prioritized for those experiencing homelessness. Consistent with Housing First, permanent affordable housing was by far reported to be the greatest need and best use of the HOME-ARP funds. This includes transitional housing, permanent supportive housing, and rapid re-housing, all accompanied by supportive services.

At-risk of homelessness

The priority need identified for individuals and households at-risk of homelessness is development of affordable housing. Particularly, units which may be eligible for existing tenant-based rental assistance, for which there are currently few eligible units for which low income-individuals can utilize them for. Rehabilitation of existing rental developments was also identified to bring up the quality of habitation for those who may be at-risk due to living conditions. The need for mission-based developers, landlords or property management companies that are understanding in terms of tenant selection who can rent to very low-income households or those who have had economic issues due to COVID-19 is also identified.

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

The priority need identified for individuals and households fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking is the development of affordable housing. Supportive service and capacity building for organizations who help these individuals is also identified.

Other populations

Other families requiring services or housing assistance to prevent homelessness

The priority need identified for families was the development affordable housing. Specifically, housing with units that are large and affordable enough for families. Rehabilitation of vacant housing stock was also brought up as a potential solution due to the needs of larger families.

At greatest risk of housing instability

The priority need identified for refugee groups, individuals exiting the prison system, and sex-offenders who are at risk of housing stability is the development of affordable housing which can be feasible options for these populations and would not turn them away.

Veterans and families that include a veteran family member

The priority need identified for veterans and families that include a veteran family member include the development of affordable housing. Low-barrier affordable housing with streamlined application processes was specifically identified as a need. Developments near bus stops or basic resources, as well as more units for aging populations were identified as housing which would be impactful for veterans populations.

For all groups requiring it, service needs would need to be tailored if any specific populations were targeted, such as refugees, criminal reentrants, those fleeing domestic violence, veterans, etc. For this reason, partners did not often prioritize this as a sole activity, but an activity that would be included in the budgets and programming of any use of HOME-ARP funds. This will be reflected within future HOME-ARP RFP releases, where priority will be given to any developers who may partner with supportive service providers or provide them as a part of the whole development.

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:

Homeward, the Continuum of Care for Polk County and Des Moines, as well as the Institute for Community Alliances host dashboards detailing the shelter inventory, trends, and efficacy of service delivery systems. This was used to inform the plan. The Point in Time Counts, Housing Inventory Counts, and Comprehensive Housing Affordability Strategy (CHAS) data published by HUD were also used to present the level of need. Data was also heavily supplemented with direct consultations from the Continuum of Care and various housing service providers.

HOME-ARP Activities

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

The City of Des Moines solicits applications to fund affordable new construction or acquisition and rehabilitation of rental developments through Request for Proposals (RFPs). This process currently exists through the HOME program, where proposals are accepted on a rolling basis.

For the HOME-ARP funds, the City will mirror this process. After HUD has approved the City's HOME-ARP Allocation Plan, staff will send a notice of funding availability to developers and service providers. Proposals will be reviewed on a first-come, first-completed process. This means that developers will submit their proposal, but it will not be entered into the queue for approval until all their support documentation has been provided. Developers requesting HOME-ARP funds will not only have to submit construction project documentation, but they will also have to provide a supportive services work plan with a service provider identified.

City staff will have 30 days to let developers and partnering service providers of any proposal documentation deficiencies. City staff will work as much as possible with a developer to obtain all relevant information. Staff reserve the right to decline a proposal after three attempts to notify a developer and service provider of missing information. Proposal deficiencies, awards, and declines will all be in writing either by email or by letter.

As mentioned above, proposals will need to have both project documentation and a work program for supportive services. Project documentation will follow the HOME Program regulations and best practices, including a construction timeline, site plans, developer capacity, sources and uses, project budget, unit mixes, rent levels, utility allowances, and income levels. In addition, service providers should provide support documentation including homeless policies, commitment to Housing First, lease agreements, and service objectives. A full list of requirements is on attachments HOME-ARP Application Checklist.

Proposals will be processed by Neighborhood Services staff to ensure compliance with threshold criteria, as established by the City’s HOME underwriting criteria. A review committee will be established with members from the Neighborhood Services staff, Development Services staff, and Homeward to review proposals from a qualitative perspective.

Once both staff and the review committee have agreed to fund a proposal, the project and all requirements will be outlined in a HOME-ARP written agreement. City Council will have final approval of the HOME-ARP written agreements for the projects.

The City of Des Moines will not directly administer HOME-ARP eligible activities to individuals or households. The City will award all funding, except for administration and planning funds, to developers and subrecipients.

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:

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

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services			
Acquisition and Development of Non-Congregate Shelters	\$177,815.85	5%	

Tenant Based Rental Assistance (TBRA)			
Development of Affordable Rental Housing	\$2,667,237.75	75%	
Non-Profit Operating	\$177,815.85	5%	5%
Non-Profit Capacity Building			5%
Administration and Planning	\$553,447.55	15%	15%
Total HOME-ARP Allocation	\$3,556,317.00		

Additional narrative, if applicable:

Describe how the characteristics of shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The need for affordable housing was continually expressed during multiple consultations and was the primary rationale for weighting it heavily in the proposed allocation. This weighting is also consistent with the Housing First goals of the CoC and homeless service providers, which prioritizes moving homeless individuals into stable housing.

While not unimportant, neither the gap analyses nor consultations led to the conclusion that funding additional non-congregate shelter represented a best use of HOME-ARP funding. Similarly, TBRA is an effective strategy and important piece for helping those with housing instability but is not a resource the City is lacking. For example, direct rental assistance is available under the CoC program and the Emergency Rental Assistance Program.

Strategies to increase the stock of affordable housing were prioritized, however all partners recognized the importance of supportive services in tandem with affordable rental housing development. While the plan does not allocate funds specifically to supportive services, RFPs for use of City of Des Moines HOME-ARP funds will likely not be considered unless the explicit provision of supportive services, or partnership with a provider of supportive services is included as part of the project proposal.

An additional allocation was included for the acquisition and development of non-congregate shelter after discussions with community partners regarding the need for culturally specific shelters which can serve limited-English speaking or immigrant communities. While shelters cannot have a specific cultural preference due to Fair Housing laws, this need is recognized and the City will welcome applications for the acquisition and development of non-congregate shelters which include services in their work program to support these communities. If the allocation for the acquisition and development of non-congregate shelters is not spent in five years, the City will reallocate this amount to the development of affordable rental housing.

HOME-ARP Production Goals

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

At this time, the City of Des Moines estimates the creation of at least 40 units of permanent supportive housing for qualifying populations. This estimate may change depending on project applications and the layering of other funding sources.

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 specific affordable rental housing production goal will be to help to alleviate homelessness within the City of Des Moines. Another goal will be to increase the supply of permanent supportive and affordable housing options for qualifying populations. These goals were identified during consultations and determined to be achievable based on funding amounts and current gaps.

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:

The City Des Moines does not expect to give preference to one or more qualifying populations or subpopulations for the use of HOME-ARP funds. However, based on discussions with local developers and non-profits and the intention to primarily fund affordable housing development projects, the City also welcomes flexible and creative projects with regards to populations served, if that population is one of the qualifying populations discussed in this plan. Despite this, there is not a preference to any of these populations, as long as they meet the definitions of the four qualifying populations. Lastly, projects must comply with all Fair Housing regulations to be considered for funding.

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:

Not Applicable. The City of Des Moines does not plan to give preference to one or more qualifying populations or a subpopulation for any eligible activity or project.

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 o the other qualifying populations that are not included in the preference:

Not Applicable. The City of Des Moines does not plan to give preference to one or more qualifying populations or a subpopulation for any eligible activity or project.

HOME-ARP Refinancing Guidelines

Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity

Not Applicable. The City of Des Moines does not plan to use HOME-ARP to refinance existing debt secured by multi-family housing.

Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.

Not Applicable. The City of Des Moines does not plan to use HOME-ARP to refinance existing debt secured by multi-family housing

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

Not Applicable. The City of Des Moines does not plan to use HOME-ARP to refinance existing debt secured by multi-family housing

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

Not Applicable. The City of Des Moines does not plan to use HOME-ARP to refinance existing debt secured by multi-family housing

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

Not Applicable. The City of Des Moines does not plan to use HOME-ARP to refinance existing debt secured by multi-family housing

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

Not Applicable. The City of Des Moines does not plan to use HOME-ARP to refinance existing debt secured by multi-family housing.