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COLUMBUS CONSOLIDATED GOVERNMENT

HOME-ARP ALLOCATION PLAN

AUGUST 2022

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Introduction

The American Rescue Plan (ARP) was signed into law on March 11, 2021 and provides federal funding to relieve the continued impact of the COVID-19 pandemic on the economy, public health, state and local governments, individuals, and businesses. Within the ARP, Congress appropriated \$5 billion specifically to address the need for homelessness assistance and supportive services. Intended to be administered through HUD's existing HOME Investment Partnerships Act (HOME) Program, this allocation of ARP funds, known as HOME-ARP, must be used to perform four eligible activities that primarily benefit individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. The four eligible HOME-ARP activities include: (1) development and support of affordable housing; (2) tenant-based rental assistance (TBRA); (3) provision of supportive services; and (4) acquisition and development of non-congregate shelter units.

The City of Columbus has been allocated \$3,574,055 in HOME-ARP funds and has engaged in a consultation and public participation process to develop this HOME-ARP Allocation Plan. In this plan, the City describes how it intends to distribute HOME-ARP funds locally. In accordance with federal regulations and the guidance contained in Community Planning and Development Notice CPD-21-10, the plan will be submitted to HUD as a substantial amendment to the City's Fiscal Year 2021 Annual Action Plan.

Consultation

Before developing this HOME-ARP Allocation Plan, the City consulted with a variety of agencies and service providers whose clientele include the HOME-ARP qualifying populations to identify unmet needs and gaps in housing or service delivery systems. Input from these providers was also used to determine the HOME-ARP eligible activities currently taking place within the City's jurisdiction and potential collaborations for administering HOME-ARP.

At a minimum, the City is required by HUD guidance to consult with the Columbus-Muscogee/Russell County Continuum of Care, homeless and domestic violence service providers, veterans' groups, the Housing Authority of Columbus, GA, public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities. Columbus's HOME-ARP consultations included representatives for each of these organization types and others that serve people experiencing homelessness in Columbus. These consultations are summarized in the table that follows.

Summarize the consultation process

Columbus began its consultation process by identifying organizations and points of contact representing each of the required areas of consultation. Several housing and homeless service providers were invited to participate in one of two virtual meetings on Tuesday, July 19th. Consultation meetings were held at 1:30pm and 6:30pm on July 19th. Agencies unable to send a representative to a consultation meeting were contacted by phone between July 20-21. These responses formed the basis for determining the City's proposed HOME-ARP activities, uses of funds, and the composition of a first draft of the HOME-ARP plan.

During the HOME-ARP stakeholder meetings and phone interviews, participants were asked detailed questions specifically targeted to the types of input required for the HOME-ARP plan.

List the organizations consulted, and summarize the feedback received from these entities.

Agency /Organization Consulted	Type of Agency/Organization	Method of Consultation	Feedback
Access to Independence	Disability rights and/or services	Interview	<p>The mission of Access to Independence is to prevent homelessness, including preventing clients from returning to nursing homes or becoming street homeless. Similar services are offered in Columbus by Goodwill and Valley Rescue Mission.</p> <p>The greatest need is affordable, accessible housing. Another need is to circumvent the requirement to earn three times the rent. This ratio does not work for people living on SSDI.</p> <p>Access to Independence is open to collaborating around homeless persons with disabilities and homeless seniors. The organization cannot own or rent property.</p>
American Legion	Veterans' Services	Stakeholder Meeting	Columbus needs emergency shelter and affordable rental housing for veterans. Can the city create a rent stabilization policy with these funds?
Columbus Community Reinvestment Department	Fair Housing City, county, or state agency	Interview	All the HOME-ARP eligible activities are currently being implemented in Columbus. The City has not received any fair housing complaints or referrals.

			<p>The greatest needs include non-congregate shelter and affordable rental housing. The city does not have an official non-congregate shelter. The City's strategy has been to house homeless persons in hotels and motels, which exacerbates the case management of the individual. Having individuals in a centralized location daily for a period allows for the necessary intensive case management to help families overcome homelessness.</p> <p>Looking at affordable rental housing, low- to moderate-income households are being priced out due to the current market. Affordable housing grows out of reach daily. HOME-ARP funding could allow for the development to housing accommodate the current demand. We would like to see consideration in that area to ensure civil rights are preserved and protected classes are respected, and everyone is fairly housed.</p> <p>Columbus has a unique opportunity to partner with connectors, producers, and service providers to develop emergency shelter and affordable rental housing. These partnerships are continuing to form amongst the city's numerous agencies. Junior Achievement could be a good partner for bringing financial literacy programs to Columbus.</p>
Columbus NAACP	Civil Rights Organization	Interview	<p>The NAACP is aware of several resources serving homeless populations, including St. Ann's Catholic Church and the Georgia Rental Assistance Program. Income-based affordable</p>

			<p>housing is offered by the Housing Authority of Columbus, GA. Homeownership programs are offered by NeighborWorks.</p> <p>Columbus does not have enough shelter or affordable housing. A lot of the City's homeless are not being counted. There is a large invisible homeless population.</p> <p>Potential collaborations include public-private partnerships, pursuing funding from the Community Foundation with a match, and empowering non-profits.</p>
Home for Good	Columbus-Muscogee Continuum of Care	Stakeholder Meeting	<p>Columbus needs attainable, affordable, safe units. It is taking us 2-3x longer to find an affordable unit versus just 6 months ago. The needs for non-congregate shelter are being met now. The goal is not to have people housed in congregate settings; it is to get folks housed as quickly as possible (Housing First model). Homelessness prevention is less disruptive for the family. Home for Good is a big proponent of wrap around services and community case management models.</p> <p>Home for Good has a homelessness prevention program through ESG funding but they must inspect homes to make sure that they meet quality standards. The units cannot pass inspection, forcing us to move the family. We have 30-60-90-day extensions because we do not have quality units available.</p>

			<p>Some of the greatest needs include case management for a minimum of one year once a family is housed. Families need continued assistance, for example, during Christmas when most people tend to overspend. Home for Good will be expanding into the schools. Junior Achievement is a good model as well for financial literacy.</p>
Hope Harbour	Domestic Violence Service Provider	Stakeholder Meeting	<p>Hope Harbour offers rapid re-housing, but we do not have the housing to put people into. The organization also needs funding for furniture and household goods, which is a hard thing to get funded.</p> <p>One of the greatest needs is that there can be a small gap between re-housing eligibility and what a recipient earns, (e.g., \$2,000 difference) making them ineligible. Hope Harbour currently receives CoC rapid re-housing funding but has not applied for DCA rapid re-housing because of its onerous requirements. Hope Harbour victims are homeless due to domestic violence and may not be low income. More services seem to be available to persons who street homeless.</p> <p>Homeless providers in Columbus are good about collaborating with one another. If a client does not qualify at Hope Harbour, staff will refer the client to another local organization.</p>
Housing Authority of Columbus, GA	Public Housing Authority	Stakeholder Meeting	<p>The HACG has several current projects that are HOME-ARP eligible, including the Banks at Mill Village (102 units), The</p>

			<p>Warm Springs project with the Macon Housing Authority, a LIHTC project for Booker T. Washington South and a potential project at the Warren Williams site. We have an inadequate amount of affordable housing. There is not enough housing for people to use vouchers. There are 217 voucher holders that cannot find a unit to rent. We have 3,000 families on our waitlist, with another 3,800 on the waitlist for our RAD properties. We have had 1,200 applicants for the Banks at Mill Village despite having only 102 units.</p>
NeighborWorks	General service provider for qualifying populations	Stakeholder Meeting	<p>The gap between Columbus's affordable and available housing units is 16,000 units. Approximately 740 vouchers have not been allocated because there is no inventory. We have 60 family units targeting households earning up to 60% AMI. We need gap funding to build 160 multifamily units for seniors, aged 55 and over.</p> <p>A critical need is gap funding to create new units affordable to those earning up to 60% AMI. People are looking for housing units and cannot find them. We are stabilizing families that are paying student loans. Every program is short of funding.</p> <p>Rents keep increasing. Families are paying more than they can afford or live in slum housing. Some families live in trailers with no air conditioning or plumbing, or their house is in a dangerous area, or they must move every 2-3 months and their children are falling behind in school. We are seeing community impacts from crime to educational attainment.</p>

			<p>Families suffer because they do not have safe housing. Our community health is tied to affordable housing; housing that is affordable to that family. When we stabilize families, they will thrive.</p> <p>The biggest issue is that housing is really expensive to acquire or build. Housing production is an issue. LIHTC is a huge equity injection. Builders cannot afford to rent to families earning 30% AMI without subsidies. NeighborWorks is already looking at subsidy layering. Landlords can increase rents beyond HUD standards, which is why we need housing built to be affordable. 60% AMI can be a high rent standard for some families.</p> <p>One area for collaboration is to produce new developments and set aside units for families with vouchers, persons coming from homelessness, persons with disabilities, etc. Another area for collaboration is working with the Muscogee superintendent to host financial literacy programs for youth. Everyone on the call is open to collaborations. We mostly partner together. The partners come together to ensure success.</p>
Salvation Army	General homeless service provider	Stakeholder Meeting	<p>The Salvation Army is redeveloping its 2nd Avenue property. We will build a new 22,000 sq. ft. service center and non-congregate shelter. Our other services include rapid re-housing, rental assistance, and homeless prevention services. We have had a hotel/motel voucher program since 2018. We</p>

are switching to non-congregate shelter as a response to the COVID-19 pandemic.

Having worked with the homeless community for a long time, the biggest win for the Salvation Army is if we can keep someone in the house they have. When the home is gone, education and other things get disrupted. If a family has lost their home, they can enter Salvation Army's Pathways facility. Sometimes homes are lost due to medical debt or a lost job. We want to help people find out why they are where they are and reintegrate into society.

There are over 1,000 homeless children in our community. Rental assistance is greatly needed. The Georgia Rental Assistance (GRA) program had significant issues; local CDBG-CV funding helped us in the way we were expecting from GRA.

Another need is financial education. There is a middle school program (outside of Columbus) that teaches financial concepts, e.g., how to budget and save, what is a check, etc. The program was very popular. This would be a wish for Columbus. Columbus Tech is excited to partner with our Pathways programs. Salvation Army will have a remote learning classroom. When you tell people what you want to accomplish, they usually want to help you.

HOME-ARP funds connect across those who are chronically homeless to those in temporary housing or shelter to those who are in housing. These funds can continue to build a

			collaborative network. Columbus does not have a silo mentality. We make sure people are housed because housing is health. Once housing is taken away, lives are impacted for generations.
St. Ann Community Outreach	General service provider for qualifying populations	Stakeholder Meeting	<p>St. Ann's Outreach provides eviction prevention, including rental assistance in partnership with the Salvation Army. St. Ann's also assists with utility assistance and financial literacy. The organization does not assist with security deposits or motel stays.</p> <p>St. Ann's receives 3-10 calls per week from people who have been displaced from hotels. These families must wait until they are street homeless before receiving services, since persons living in hotels do not qualify as homeless. Waitlists for services tend to be long; additionally, there are some issues with the 211 service. There is an increasing number of calls from disabled persons who have been evicted. Landlords are less patient and raising rents at each lease renewal.</p>

Public Participation

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

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

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

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

Prior to adoption by the Columbus City Council and submission to HUD, the City invited members of the general public to participate in the HOME-ARP planning process by reviewing and commenting on a draft of the Allocation Plan. The draft HOME-ARP Allocation Plan was made available for public review and comment for a 14-day period beginning July 26 until August 9, 2022 via the City of Columbus Department of Community Reinvestment and Real Estate. A Public Notice was published on July 26, 2022 in the Columbus Ledger-Inquirer and on Columbus’s Community Reinvestment website and social media to notify residents of the opportunity. The public was invited to submit written comments by mail or hand delivery to the Columbus Community Reinvestment Department at 420 E. 10th Street or by email to the department’s Director.

- **Public comment period:**
 - start date – July 25, 2022
 - end date – August 9, 2022
- **Public hearing:**
 - August 9, 2022

Describe any efforts to broaden public participation:

In preparing this HOME-ARP Allocation Plan, the City of Columbus conducted public outreach to gather input from citizens, City staff, the Columbus-Muscogee Continuum of Care, the Housing Authority of Columbus, GA,

non-profit agencies, local service providers, and others. To involve members of the public in the Plan, the City advertised its draft HOME-ARP Allocation Plan, including the amount of the City's allocation, the range of activities eligible for funding, and the City's proposed use of HOME-ARP funds in the *Columbus Ledger-Enquirer* newspaper on July 25, 2022. In the public notice, the City specified procedures for requesting special accommodation for anyone needing support in order to fully participate in the public hearing. The public hearing was held virtually on August 9 at 9:00 a.m. In compliance with the Columbus's Citizen Participation Plan, the City provided a bilingual public hearing presentation in Spanish and English.

The City offered a variety of avenues for members of the public to participate by commenting on the draft plan. These included both mail and email options for written comments, telephoned comments for persons with hearing impairments through Georgia Relay and the opportunity to comment orally at the scheduled public hearing.

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

Before developing this HOME-ARP Allocation Plan, the City consulted widely with a variety of agencies and service providers whose clientele include the HOME-ARP qualifying populations. Consultations were achieved primarily through two stakeholder meetings and one-on-one interviews. The comments and recommendations received through these processes are summarized in the preceding "Consultation" section of this plan.

Upon completion of a draft of the City's HOME-ARP Allocation Plan, the draft plan was made available for public comment for a 15-day period from July 25 to August 9, 2022. TBD - The City did/did not receive any comments or recommendations through this portion of the public participation process.

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

TBD

Needs Assessment and Gaps Analysis

This needs assessment and gaps analysis evaluates the size and demographic composition of HOME-ARP qualifying populations within Columbus and assesses the unmet needs of those populations. This analysis includes both gaps in the current supply of housing and shelter units as well as gaps within the services offered by the local network of homeless assistance organizations. A variety of data sources inform this analysis, including the City’s recent 2021-2025 Consolidated Plan, the CoC’s point in time and housing inventory counts, and consultations with service providers.

Homeless Needs Inventory and Gap Analysis Table

					Homeless								
	Current Inventory				Vets # of Beds	Homeless Population				Gap Analysis			
	Family		Adults Only			Individuals in Households w/ Children	Individuals in Adults-Only Households	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units						# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	135	39	65		0								
Transitional Housing	16	8	38		0								
Permanent Supportive Housing	30	19	182		54								
Other Permanent Housing						--	--	--	--				

Sheltered Homeless						192	--	--				
Unsheltered Homeless						51	--	--				
Current Gap										51 beds – emergency, transitional, and permanent supportive housing		

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

Note: Data from the 2022 Point-in-Time Count for the Columbus-Muscogee CoC was not broken down by individuals in households with and without children, other permanent housing, or victims of domestic violence.

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	37,723		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,755		
Rental Units Affordable to HH at 50% AMI (Other Populations)	6,928		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		6,080	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,680	
Current Gaps			8,760

Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

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

Residents Experiencing Homelessness

Columbus is part of the Columbus-Muscogee Continuum of Care (CoC), which conducted an annual Point-in-Time count during the last 10 days of February 2022. The 2022 Point-in-Time sheltered count for the Columbus Muscogee CoC took place on Tuesday, February 22nd; the unsheltered count occurred on Wednesday, February 23rd. The PiT count identified 243 homeless persons in Muscogee County. Point-in-Time figures do not represent the entire population experiencing homelessness in Muscogee County, but rather

the number of people experiencing homelessness who were sheltered and unsheltered (as observed) at the time of the count.

Of the 243 people experiencing homelessness, 51 were categorized as unsheltered and 192 as sheltered. Eleven people were identified as veterans. 2022 data was not available for families with children and unaccompanied youth in Columbus. The most recent Point in Time count shows an increase in the number of homeless individuals in Columbus, particularly unsheltered persons. In 2021, the CoC observed a total of 236 sheltered and unsheltered persons. Of these persons, 209 were sheltered and 27 were unsheltered. While the overall number of homeless persons only increased by seven between 2021 and 2022, the number of unsheltered homeless persons increased by 24 (from 27 in 2021 to 51 in 2022). The number of homeless veterans nearly doubled between 2021 and 2022, from 6 persons to 11 persons.¹

Residents At Risk of Homelessness

The most recent CHAS dataset (2014-2018) indicates that approximately 70% of all low-to-moderate income households (20,805 households) experience cost burdens. Severe cost burdens affect 40% of all low-to-moderate income households (11,945 households). Looking at households by tenure, cost burdens affect a significantly larger number of renters (8,985 households) than homeowners (4,850 households). Severe cost burdens affect nearly three times as many renters (9,055 households) as homeowners (3,305 households).

Additional housing issues that may increase residents' risk of becoming homeless include overcrowding and substandard housing. Approximately 938 households earning up to 100% AMI are overcrowded; another 260 households are severely overcrowded. Around 945 households reside in substandard housing or lack complete plumbing and kitchen facilities. Although these percentages pale in comparison to households with cost burdens, the total number of households experiencing problems other than cost burdens amounts to 1,883 or nearly 3% of the 72,924 households reported in Columbus in 2018.

Survivors of Domestic Violence

The Centers for Disease Control estimates that 37.4% of women and 30.4% of men in Georgia have experienced any contact sexual violence, physical violence, or stalking by an intimate partner in their lifetimes.² This equates to an estimated 39,700 women and 30,634 men living in Columbus, based on the city's 2020 population of 206,922.³ An estimated 45.5% of women and 49.9% of men in Georgia have experienced any psychological aggression by an intimate partner,⁴ which equates to an estimated 48,299 women and

¹ HUD. (2021) "HUD 2021 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations." https://files.hudexchange.info/reports/published/CoC_PopSub_CoC_GA-505-2021_GA_2021.pdf

² The National Intimate Partner and Sexual Violence Survey (NISVS) | 2010-2012 State Report. <https://www.cdc.gov/violenceprevention/pdf/NISVS-StateReportBook.pdf>

³ 2020 Decennial Redistricting Data, Table P1 and 2020 ACS 5-Year Estimates, Table DP05

⁴ The National Intimate Partner and Sexual Violence Survey (NISVS) | 2010-2012 State Report. <https://www.cdc.gov/violenceprevention/pdf/NISVS-StateReportBook.pdf>

50,284 men living in Columbus. During its 2021 PiT count, the CoC identified 11 homeless persons who were victims of domestic violence and living in emergency shelter. Another two victims of domestic violence were living in a transitional housing program.⁵

Other Populations At Risk of Housing Instability

Persons with Alcohol or Drug Addiction

The region that includes Muscogee County and 30 other Georgia counties has an estimated 4.5% rate of alcohol use disorder in the past year for individuals aged 12 and older, according to 2016–2018 data from the US Substance Abuse & Mental Health Data Archive (SAMHDA). About 6% of the region’s population is estimated to have “substance use disorder in the past year” according to the 2016–2018 dataset.⁶ The 2021 PiT count indicated 31 homeless persons with chronic substance abuse, who were either living in emergency shelter or transitional housing.

Re-entry Populations

The Georgia Department of Community Supervision reports that in 2022, the population of persons convicted in Columbus/Muscogee County and on probation is 4,729 people or 2.3% of the city’s population. The current population of persons convicted in Columbus/Muscogee County and on parole is 301 people or 0.1% of the city’s population.⁷

Elderly and Frail Elderly

According to 2020 ACS 5-Year Estimates, around 13.2% of Columbus’s population is elderly, aged 65 and over. Frail elderly, or persons aged 75 and over, make up 5.5% of the city’s population. The city’s elderly population is 60% female and 40% male. White, non-Hispanic residents make up 55% of all persons 65 years and older. Another 40% of city’s elderly residents are Black, while 2% are Asian and 2% are Hispanic.⁸

People with Disabilities

As estimated 17.8% of Columbus residents have one or more disabilities. An estimated 43.5% of elderly individuals aged 65 and over in the city have a disability. The most common disability type is ambulatory difficulty, which affects 11% of all persons with disabilities. Cognitive disabilities are the second most common disability type, affecting 10% of all persons with disabilities.⁹

⁵ HUD. (2021) “HUD 2021 Continuum of Care Homeless Assistance Programs Homeless Populations and Subpopulations.” https://files.hudexchange.info/reports/published/CoC_PopSub_CoC_GA-505-2021_GA_2021.pdf, p. 2

⁶ Substance Abuse & Mental Health Data Archive. “Interactive National Survey on Drug Use and Health Substate Estimates.” <https://pdas.samhsa.gov/saes/substate>

⁷ Georgia Department of Community Supervision. “Annual Population.” <https://dcs.georgia.gov/dcspopulation>

⁸ 2020 ACS 5-Year Estimates, Tables S0101 and S0103

⁹ 2020 ACS 5-Year Estimates, Tables B18101 and S1810

People with HIV/AIDS and their Families

According to AIDSvu, an interactive mapping tool from Emory University's Rollins School of Public Health, there were an estimated 56,446 people living with HIV in Georgia in 2019, including 2,439 people newly diagnosed that year. In Muscogee County, about 695 out of every 100,000 residents were living with HIV, and 28.8 of every 100,000 people were newly diagnosed with HIV in 2019.¹⁰ The 2021 PiT count reported that there were 3 persons living with HIV or AIDS who were housed in emergency shelter.

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:**

Data from the 2021 Housing Inventory Count Report indicates that the City of Columbus has 135 emergency shelter beds for families and 65 emergency shelter beds for adults. It should be noted that 43 emergency family beds serve victims of domestic violence and are not available to the general population. Transitional housing providers offer 16 transitional beds for families and 38 transitional beds for adults. Combined, these two housing types provide 254 beds in Columbus, with 211 beds available to persons who are not victims of domestic violence.

The 2022 Point-in-Time Count indicated that there were 192 sheltered homeless individuals and 51 unsheltered homeless individuals, totaling 243 persons. While current 2022 PiT data does not break down its sheltered persons by family type (with or without children) or by the number of households fleeing from domestic violence, the 2021 inventory count indicates that the city's 254 emergency shelter and transitional housing inventory could accommodate most of the city's sheltered and (known) unsheltered persons.

It should be noted, however, that the number of sheltered persons has decreased from 209 in 2021 to 192 in 2022. The unsheltered population has risen in greater proportion, from 27 in 2021 to 51 in 2022. Public engagement conducted during the Consolidated Plan planning process in 2021 indicated that Columbus has some homeless individuals that opt out of shelter, preferring to live on the street, or who are barred from entering shelters due to their sex offender status. However, the drastic increase in the numbers of unsheltered homeless persons may also indicate a shift toward higher rates of chronic homelessness in Columbus.

¹⁰ Emory University Rollins School of Public Health, AIDSvu. (2019). Retrieved from: <https://map.aidsvu.org/map>

A second housing inventory, shown above, indicates the number of affordable rental units in Columbus. Of the city's 37,723 rental units, 1,755 (5%) are affordable to households earning at or below 30% AMI. A total of 6,928 rental units (18% of the city's total) are affordable to households earning 0-50% AMI. Despite the provision of nearly 7,000 affordable units, renter households continue to struggle with severe housing problems including severe cost burden, overcrowding and substandard facilities. The table notes that Columbus has 6,080 renter households that are both very low income (earning 0-30% AMI) and who have a severe housing problem. Another 2,680 renter households earn between 30-50% AMI and have a severe housing problem. Together, these households account for a gap of 8,760 renter households in Columbus who still need housing that is affordable and in good condition. These very low- to moderate-income households represented in the gap analysis are most likely to be currently housed but at risk of homelessness, to require housing assistance, or to be at risk of housing instability.

Participants in the stakeholder meetings and interviews reiterated the need for safe and affordable housing for persons at high risk of homelessness, including severely cost burdened households, voucher holders unable to find a unit, persons with disabilities living on SSDI, and families currently living in substandard housing.

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:

According to its 2021 Housing Inventory Count Report, Columbus has 235 emergency shelter beds, including 135 family beds (39 units), 65 adult-only beds and 35 seasonal beds. Emergency shelter is provided by Chattahoochee Valley Jail Ministries, Home for Good, Hope Harbour, House of Mercy, Salvation Army, Valley Rescue Mission and Verge Church.¹¹ The city has 54 transitional housing beds, including 16 family beds (8 units) and 38 adult-only beds. Transitional housing is offered by House of TIME and the Open Door Community House. There are 240 permanent supportive beds, including 30 family beds (19 units) and 210 adult-only beds. Permanent supportive housing is offered by House of TIME, the Housing Authority of Columbus, GA, the New Horizons Community Service Board, and the Stewart Community Home.¹²

The city also offers 212 beds (52 family, 160 adult) through several rapid rehousing programs. Rapid rehousing is offered by Chattahoochee Valley Jail Ministries, Home for Good, the Homeless Resource Network (now Southwest Georgia Housing Opportunities), Hope Harbour, House of TIME, the New Horizons Community

¹¹ HUD. (2021) "Housing Inventory Count Report: CoC GA-505." p. 2

¹² Permanent supportive housing figures include 28 beds for adults with special needs at Willow Glen, operated by the HACG. These beds were originally listed as "other permanent housing" in the 2021 Housing Inventory Count Report.

Service Board and the Open Door Community House.¹³ Columbus has also offered a Tenant Based Rental Assistance (TBRA) program in previous years, managed by the Open Door Community House.¹⁴

Columbus provides a range of supportive services for homeless individuals and families. These services include 1 on 1 counseling, 12-Step Meetings, assistance with obtaining ID, addiction help, afterschool and summer programs for youth, career preparation and job training, civil legal services (covering housing discrimination, eviction, and foreclosure, among other issues), clothing, computer training, emergency financial assistance, financial counseling, groceries and community meals, medical assistance, mortgage assistance, personal hygiene items, public transit assistance, street outreach, utility and rental assistance, and a winter warming station. More than a dozen providers serve homeless individuals and families in Columbus. These providers include - but are not limited to - Feeding the Valley, Georgia Legal Services Program, Goodwill Industries Southern Rivers, New Horizons Behavioral Health, Open Door Community House, SafeHouse Ministries, Salvation Army, Sexual Assault Support Center, St. Ann's Community Outreach, Southwest GA Housing Opportunities, and the Veterans and Family Assistance Center.

Finally, the Housing Authority of Columbus, GA (HACG) provides income-based affordable housing to low-income households. In 2021, the HACG offered 1,010 HUD assisted units, 88 assisted housing units, 28 permanent supportive housing units, 989 RAD-converted units, and 62 affordable market units, totaling 2,177 income-based affordable units restricted to low- to moderate-income households.¹⁵

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

The gaps analysis in this plan identifies a gap of 51 emergency shelter and transitional housing beds needed to meet the needs of the city's homeless population. Additionally, 8,760 low-income renter households with one or more severe housing problems are at risk of homelessness. Stakeholders in the consultation process emphasized a need for affordable, accessible housing in good condition. Additional gaps identified by stakeholders include a need for non-congregate shelter, financial literacy courses, case management lasting for at least one year after a family is permanently housed, and furniture and household goods for newly housed families.

Looking at gaps in the service delivery system, providers describe a range of issues that limit service provision to homeless individuals and families. Providers observe that although services are available, waitlists can be very long. At least 2 providers report that Georgia rental assistance funds can take up to four months to become available, stating that they prefer to access local funding which takes no more than 30 days to receive. One provider reports declining DCA rapid re-housing funding due to onerous reporting requirements

¹³ HUD. (2021) "Housing Inventory Count Report: CoC GA-505." p. 3

¹⁴ CCG Community Reinvestment. (2021) "FY 21 CAPER," p. 40

¹⁵ Housing Authority of Columbus, GA. (2021) "Building a Foundation for the Future: 2021 Report to the Community." <https://www.columbushousing.org/assets/2021-Annual-Report.pdf>, p. 10

that take too much time away from serving clients. Housing developers remark that they need additional subsidies, such as LIHTC, to make the costs of affordable housing development viable. Furthermore, stakeholders point out that due to the tightening housing market, landlords are raising rents above HUD standards, limiting housing access for persons with vouchers.

Other gaps in the service delivery system are population specific. For example, domestic violence victims who are not low-income may be ineligible for income-restricted services. Disabled clients may face housing barriers, such as being required to earn 3x the rent to be eligible for housing, even if only receiving SSDI benefits. Several providers note that clients find it easier to access services if they are street homeless than if they are temporarily housed.

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:

To assess affordability and other types of housing needs, HUD defines four housing problems:

1. **Cost burden:** A household has a cost burden if its monthly housing costs (including mortgage payments, property taxes, insurance, and utilities for owners and rent and utilities for renters) exceed 30% of monthly income.
2. **Overcrowding:** A household is overcrowded if there is more than 1 person per room, not including kitchens and bathrooms.
3. **Lack of complete kitchen facilities:** A household lacks complete kitchen facilities if it lacks one or more of the following: cooking facilities, refrigerator, or a sink with piped water.
4. **Lack of complete plumbing facilities:** A household lacks complete plumbing facilities if it lacks one or more of the following: hot and cold piped water, a flush toilet, or a bathtub or shower.

HUD also defines four severe housing problems, including a severe cost burden (more than 50% of monthly household income is spent on housing costs), severe overcrowding (more than 1.5 people per room, not including kitchens or bathrooms), lack of complete kitchen facilities (as described above), and lack of complete plumbing facilities (as described above).

A total of 27,880 households, or approximately 38% of all households in the City of Columbus, experience one of the listed housing problems. Data for households experiencing severe housing problems show that nearly 14,420 households (20% of all households) experience one or more severe housing problems.

Identify priority needs for qualifying populations:

Priority needs for qualifying populations include:

- Emergency and transitional housing (non-congregate shelter) with wraparound services for people experiencing homelessness;
- Affordable housing;
- Supportive services, including mental health services, employment services, housing navigation, case management, and other wrap-around services; and
- Homelessness prevention services, including rent and utility assistance.

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

The level of need and gaps in shelter and housing inventory were determined using the Homeless Needs Inventory and Housing Need Inventory tables, information in the city’s 2021–2025 Consolidated Plan, and consultation with housing and service providers.

Data from the 2022 Point-in-Time Count and 2021 Housing Inventory Count indicates that there were 243 people experiencing homelessness in Muscogee County, including 51 unsheltered residents. While 254 emergency and transitional housing beds and 212 permanent supportive housing beds are located within the county, the number of unsheltered residents indicates a gap in housing and services that meet the needs of all people experiencing homelessness. The Housing Needs Inventory indicates that 8,760 renter households with incomes of 50% AMI and below have severe housing problems, which may include lacking kitchen or complete plumbing, severe overcrowding, or severe cost burden.

The gaps in the service delivery system were determined through stakeholder interviews, public meetings, and a survey of residents experiencing homelessness conducted during the community engagement processes for the HOME-ARP plan and the city’s 2021–2025 Consolidated Plan.

HOME-ARP Activities

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

On August 10, the City of Columbus will begin accepting HOME-ARP proposals from local applicants. The city's request for proposals will remain open from Wednesday, August 10 through Tuesday, September 6. Applicants are required to mail or hand-deliver proposals to the city's Community Reinvestment Department, located at 420 10th Street, Columbus, GA 31901.

The City's HOME-ARP NOFA indicates that proposals must, at minimum, include the following items:

- Project Type
- Project Description: Please provide a thorough description of the project to include populations served, project design, needs of the population and projected quantifiable outcomes.
- Project Address
- Is this a New Construction Project?
- Proof of Ownership or Long-Term Lease (if applicable)
- Does Recommended property require rehabilitation. If so, include cost estimate and scope of work (if applicable)?
- What firm financial commitments are being provided for this project? Please provide proof of funding via commitment letters and balance sheets.
- Does your agency have experience with the project in which you are applying?
- Has your agency administered any of the activities outlined in your proposal? Discuss experience with the project to include number of people served and outcomes to include the following:
 - Earned income increases
 - Reduction in household cost burden
 - Provision of supportive or wrap around services
 - Housing characteristics (if applicable)
 - Neighborhood characteristics (if applicable)
- Please provide information regarding nearby local resources and services within a reasonable proximity of the project that will be a benefit to the individual or household. At minimum, these benefits should include the following:
 - Education
 - Community resources
 - Local services

Guided by the priorities established in the HOME-ARP Allocation Plan, the city will award funding to projects based on the merit of the proposals. Funded projects will be announced on the Community Reinvestment Department website on Tuesday, October 11, 2022.

The City of Columbus will administer its HOME-ARP funds directly. Where subrecipients, contractors, developers, professional services, products, and materials may be required for the implementation of the City's HOME-ARP activities, these will be obtained in accordance with the City's established procurement policies and procedures.

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. The City will not allocate funds to a subrecipient or contractor to administer the entire HOME-ARP grant.

Use of HOME-ARP Funding

Funding Category	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$537,947		
Acquisition and Development of Non-Congregate Shelters	\$1,250,000		
Tenant Based Rental Assistance (TBRA)	\$0		
Development of Affordable Rental Housing	\$1,250,000		
Non-Profit Operating	\$0	0%	5%
Non-Profit Capacity Building	\$0	0%	5%
Administration and Planning	\$ 536,108	15%	15%
Total HOME ARP Allocation	\$ 3,574,055		

Additional narrative, if applicable:

The City of Columbus's HOME-ARP allocation of \$3,574,055 will be split between the costs of the selected projects (\$3,037,947) and the administration and planning costs to carry out the projects (\$536,108). These implementation costs will provide full financial assistance for the first five years. Supplemental funding from the City's CDBG and/or HOME allocation may be used to sustain the program after that initial period.

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

The housing inventory gap analysis indicates that 8,760 renter households with incomes of 0%-50% AMI have severe housing problems, which may include lacking complete kitchen or plumbing facilities, severe overcrowding, or severe cost burden. These low- to moderate-income households are at increased risk of housing instability and/or homelessness and are most likely to need housing assistance to remain stably housed. Stakeholders in the consultation process noted that rising housing costs make it increasingly difficult to help low- to moderate-income families remain housed.

Data from the 2021 and 2022 Point-in-Time counts as well as the 2021 Housing Inventory Report indicates a need for additional shelter facilities. The City reports having 254 emergency and transitional beds, with another 212 permanent supportive housing beds. However, the city also saw an increase in unsheltered persons at the time of the 2022 PiT count, from 27 persons in 2021 to 51 persons in 2022. This shift indicates a growing need for shelter units with wrap around case management to help end the cycle of homelessness before it becomes a chronic condition. Changes in the number of unsheltered homeless persons also support the need for additional affordable housing to prevent homelessness for those who are at high risk of becoming homeless.

HOME-ARP Production Housing Goals

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

The City estimates that a total of 16 new non-congregate shelter units and 4 new affordable rental housing units will be created using HOME-ARP funds. The City will strive to produce as many new shelter and affordable housing units as efficiently as possible, however, costs per unit vary depending upon many factors, including the cost of property acquisition (versus use of City-owned property) as well as material and construction differences between the various building types under consideration.

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:

Columbus's priority needs for HOME-ARP qualifying populations include:

- Affordable housing;
- Emergency and transitional housing (non-congregate shelter) with wraparound services for people experiencing homelessness;
- Supportive services, including mental health services, employment services, housing navigation, case management, and other wrap-around services; and
- Homelessness prevention services, including rent and utility assistance.

By adding approximately 16 new non-congregate shelter units and 4 new affordable rental housing units to the city's inventory, the HOME-ARP funds will help reduce the current gap of 51 needed shelter units and 8,760 affordable rental units. Additionally, wraparound services funded by the HOME-ARP grant will further reduce gaps related to the provision of supportive services in Columbus.

Preferences

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

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

Based on findings from the Needs Assessment, the City of Columbus plans to fund the development of non-congregate shelter and affordable rental housing, as well as associated supportive services. These activities establish a preference for two HOME-ARP Qualifying Populations: persons and families at risk of homelessness and other populations who are at greatest risk of housing instability.

In applying these preferences, the City will act in compliance with all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). Eligibility and selection of applicants will be determined without regard to an applicant's race, color, religion, sex (including gender identity and sexual orientation), disability, familial status, or national origin.

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:

The housing inventory gap analysis indicates that the City of Columbus has 6,080 households that are at risk of homeless, i.e., earning 0%-30% AMI and experiencing at least one severe housing problem. Another 2,680 households earn between 30% and 50% AMI and experience at least one severe housing problem. These households are at the greatest risk of housing instability. The City plans to address the needs of these qualifying populations by supporting the development of 4 affordable rental housing units and associated supportive services.

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

At the time of the 2022 Point-in-Time count, the CoC identified 51 unsheltered homeless individuals. The City

plans to address the needs of homeless qualifying populations through the development of 16 non-congregate shelter units. Non-congregate shelter, affordable rental housing and supportive services will be available to all qualifying populations as defined in HUD's CPD Notice 21-10 (§ IV.A *Qualifying Populations*). This includes people who are homeless (both sheltered and unsheltered); those at-risk of homelessness; those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; individuals for whom provision of supportive services would prevent homelessness or who are at the greatest risk of housing instability; and veterans and their families that meet any of the listed criteria. Service needs for the other qualifying populations that are not included in the preference will continue to be met through alternate funding sources, including the City's CDBG and HOME allocations, the Columbus-Muscogee CoC's funding and resources, and ongoing nonprofit fundraising initiatives.

HOME-ARP Refinancing Guidelines

HUD guidance in CPD Notice 21-10 allows for the conditional use of HOME-ARP funding to refinance existing debt secured by multifamily rental housing when that housing will be rehabilitated with HOME-ARP funds. Jurisdictions intending to use funds in this way are required to include in their HOME-ARP Allocation Plans guidelines describing the conditions under which a refinance of existing debt will be considered. In addition to adhering to 24 CFR 92.206(b), a jurisdiction's refinancing guidelines must:

- 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.
- 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.
- State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
- Specify the required compliance period, whether it is the minimum 15 years or longer.
- State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

The City of Columbus will not use HOME-ARP funds to refinance existing debt and therefore does not establish any HOME-ARP refinancing guidelines in this plan. The above conditions and requirements are not applicable.