

# **HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME)-AMERICAN RESCUE PLAN (ARP) ALLOCATION PLAN**

**March 2023**



A Publication of Fairfax County, VA

**Fairfax County, Virginia**

## Consultation

In accordance with Section V.A of U.S. Department of Housing and Urban Development (HUD) Notice CPD-21-10 (page 13), before developing its HOME-ARP allocation plan, at a minimum, a Participating Jurisdiction (PJ) must consult with:

- Continuum of Care(s) (CoC(s)) serving the jurisdiction's geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans' groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state's boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

### ***Describe the consultation process including methods used and dates of consultation:***

Fairfax County Department of Housing and Community Development (HCD) began the consultation process with external partners and current and future stakeholders for feedback according to HUD's program guidance.

- In Person Consultation Meeting – Affordable Housing Advisory Council (AHAC), Consolidated Community Funding Advisory Committee (CCFAC), Continuum of Care (CoC) Committee, Disability Services Board (DSB), Fair Housing Task Force, Fairfax County Redevelopment and Housing (FCRHA), Fairfax-Falls Church Community Services Board (CSB), Office of Human Rights and Equity Programs (OHREP), December 6, 2022
- Virtual Consultation Meeting – AHAC, CCFAC, CoC Committee, CSB, DSB, FCRHA, Fair Housing Task Force, December 8, 2022
- Survey sent to those unable to make Consultation Meetings
- Meeting with CCFAC - December 13, 2022
- Interviews - January 9, 2023
- Public hearing - January 10, 2023
- Public comment period - January 13, 2023 – February 3, 2023

*List the organizations consulted:*

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>Affordable Housing Advisory Council</b>	Public agency that addresses the needs of qualifying populations	Consultation Session	Refer to consultation summary below
<b>Bethany House of Northern Virginia</b>	Homeless service provider; Domestic violence service provider	Survey	Refer to consultation summary below
<b>The Brain Foundation</b>	Private organization that addresses the needs of persons with disabilities	Survey	Refer to consultation summary below
<b>CFH</b>	Homeless service provider	Consultation Session	Refer to consultation summary below
<b>Community Action Advisory Board</b>	Public agency that addresses the needs of qualifying populations	Survey	Refer to consultation summary below
<b>Consolidated Community Funding Advisory Committee</b>	Public agency that addresses the needs of qualifying populations	Consultation Session	Refer to consultation summary below
<b>Cornerstones</b>	Homeless service provider	Consultation Session	Refer to consultation summary below
<b>Edu Futuro</b>	Private organization that addresses civil rights and fair housing	Consultation Session	Refer to consultation summary below
<b>FACETS</b>	Continuum of Care; Homeless service provider	Consultation Session	Refer to consultation summary below
<b>Fairfax County Dept. of Family Services – Office of Domestic and Sexual Violence</b>	Continuum of Care; Homeless service provider; Domestic violence service provider; Public agency that addresses the needs of qualifying populations	Consultation Session	Refer to consultation summary below

<b>Fairfax County Dept. of Housing &amp; Community Development – Office to Prevent &amp; End Homelessness</b>	Homeless service provider; Public agency that addresses the needs of qualifying populations	Consultation Session	Refer to consultation summary below
<b>Fairfax County Redevelopment and Housing Authority</b>	Public housing agency (PHA)	Consultation Session	Refer to consultation summary below
<b>Fairfax County Office of the County Executive – Chief Equity Officer</b>	Public organization that addresses civil rights and fair housing	Consultation Session	Refer to consultation summary below
<b>Fairfax NAACP</b>	Private organization that addresses civil rights and fair housing	Consultation Session	Refer to consultation summary below
<b>Fairfax-Falls Church Community Services Board</b>	Public organization that addresses the needs of persons with disabilities	Interview	Refer to consultation summary below
<b>Good Shepherd Housing and Family Services</b>	Homeless service provider; Private organization that addresses civil rights and fair housing	Consultation Session	Refer to consultation summary below
<b>Individuals (3)</b>	Continuum of Care; Recipient of services	Consultation Session	Refer to consultation summary below
<b>The Lamb Center</b>	Continuum of Care; Homeless service provider	Consultation Session	Refer to consultation summary below
<b>Legal Aid Justice Center</b>	Private organization that addresses civil rights and fair housing	Consultation Session	Refer to consultation summary below
<b>Legal Services of Northern Virginia</b>	Private organization that addresses civil rights and fair housing	Survey	Refer to consultation summary below
<b>National Coalition of 100 Black Women, Inc. Northern Virginia Chapter</b>	Private organization that addresses civil rights and fair housing	Survey	Refer to consultation summary below
<b>New Hope Housing</b>	Homeless service provider; Private organization that	Consultation Session	Refer to consultation summary below

	addresses civil rights and fair housing		
<b>Operation Renewed Hope Foundation</b>	Homeless service provider; Private organization that addresses the needs of veterans	Interview	Refer to consultation summary below
<b>Pathway Homes</b>	Homeless service provider; Private organization that addresses the needs of persons with disabilities	Consultation Session	Refer to consultation summary below
<b>Second Story</b>	Homeless service provider; Private organization that addresses civil rights and fair housing	Consultation Session	Refer to consultation summary below
<b>Shelter House</b>	Continuum of Care; Homeless service provider	Consultation Session	Refer to consultation summary below
<b>Society of St. Vincent DePaul</b>	Homeless service provider	Survey	Refer to consultation summary below
<b>Virginia Housing</b>	Public housing agency (PHA)	Interview	Refer to consultation summary below

***Summarize feedback received and results of upfront consultation with these entities:***

Agencies and organizations offered input by attending consultation meetings (held both in-person and virtually), responding to a survey or by individual interview. Input and feedback from all participants in the consultation process is summarized below. Input from the public hearing and public comment period is included in the “Public Participation” section.

***COVID-impacted Challenges***

Participants described changes during the COVID time-period (last three years) that impact their organizations and their clients. For clients, participants observed changes in employment and financial situations, living conditions, family dynamics, and physical or mental conditions. Participants explained that clients have not regained steady employment and many are taking gig-type employment like Uber driving. For people with disabilities, employment opportunities ceased during much of the past three years and many have not returned. Participants also described younger people who are disconnected from education and jobs and seniors who cannot work due to disability and ageism. Many participants mentioned increased isolation among clients and noted that isolation has exacerbated or created mental illness among clients.

Living situations changed substantially over the course of COVID. Participants observe fewer people living in overcrowded conditions (for fear of disease transmission), but greater housing

instability and more people who are unsheltered or otherwise homeless as a result. One participant explained “overcrowding turned into homelessness.” Participants discussed COVID relief efforts and clients’ more substantial debts and rental arrears as relief efforts have ended. Participants suggested that data for the COVID period will be impacted by relief measures that kept people “out of the system.”

Participants observed a number of shifts in family dynamics including increased caregiving needs, often requiring people to quit their jobs to become full-time caregivers. A number of participants discussed increased family instability resulting in housing instabilities. They explained that foster parents are unable to continue supports for children aging out of the foster system because of increased costs of living. Participants mentioned guardians of people with disabilities had died, creating a shortage of people serving as guardians and complicating care for people with disabilities. Participants also observed incidence of domestic violence and severity of injury increasing. One participant observed that unsheltered clients experience more illness.

Participants also discussed increased number of people with disabilities and increased severity of disability. They explained that many seniors are experiencing self-care disabilities and need both supportive services and home modification. Participants observed increasing substance use disorder and mental health issues.

Many participants emphasized the impracticality of certain types of assistance given the lack of housing supply. Increases in rental prices, which have been steep in order for landlords to recover from the COVID-period restrictions have significantly surpassed Fair Market Rent (FMR) and made units meeting assistance criteria much harder to find. Participants discussed inadequacy of FMR in both providing compensation for building operations and placing clients in units. Additionally, participants observed that fewer landlords are willing to rent to people in need and many are becoming stricter about identity documentation.

Participants explained that landlords who have been supportive of housing programs are selling their properties and new landlords are less supportive, or not at all. They also observed continued source-of-funds discrimination. They explained that landlords are deferring maintenance and tenants are afraid to request repairs. One participant suggested that deferred maintenance was a mechanism to force tenants to leave and described landlords scaring tenants to get them to leave. Though participants acknowledge the usefulness of the eviction moratorium, they described an ongoing eviction crisis, whether literal or effective. They noted that clients’ criminal backgrounds complicate matters and cited an increase in petty misdemeanors as a challenge for keeping people housed in the increasingly difficult market context.

Participants explained that housing is getting more expensive across the board, even rented rooms. Since values are increasing, the market will bear higher rents and real estate taxes are increasing, effecting both renters and owners (especially seniors on fixed incomes). Increased home values and prices also impact organizations’ ability to acquire units. Further, participants mentioned the effect of property tax increases on non-profits who do not have tax-exempt properties. They observed that new residential construction is primarily for households with higher incomes and recounted that existing housing is being converted to luxury units resulting

in a net loss of affordable units and a larger gap for extremely low-income households. They also discussed the deteriorating condition of housing and the aging housing stock. One participant emphasized the deplorable condition of units in land-lease mobile home parks and dangerous conditions in homes owned by vulnerable seniors. One participant mentioned people at risk of losing their homes because of safety issues (major systems failures or inaccessibility). Finally, participants mentioned inflation as increasing the cost of living.

### *Housing and Services Gaps*

Many participants addressed the overall supply of housing as a root-cause of housing instability and homelessness. However, participants discussed the need for some specific types of units including units affordable to people with the lowest incomes (less than 30 percent of AMI), single room occupancy units (SROs), assisted living for seniors and people with disabilities, accessible units, permanent supportive housing units for families, locally administered supportive housing (Arlington was provided as an example), subsidized housing for students, and homeownership opportunities. Many participants mentioned a need for more landlords accepting housing assistance as well as justice-involved, disabled or otherwise hard-to-house individuals. A number of participants mentioned the county should avoid and eventually phase out congregate shelters and transitional housing, however others discussed the importance of shelters, especially for those individuals and households (including children) who are the victims of domestic violence. Though participants recognized the needs for many types of housing, a number of participants identified permanent supportive housing as the most critical need.

Participants emphasized the need for non-profit or County administered housing that is less effected by the market context. To that end, participants wanted more funds for acquiring the units their clients need and more vouchers. One participant suggested HUD funding could not fully cover the costs of acquisition. Participants emphasized the inadequacy of hotels as temporary housing and the need for permanent units. Some participants identified needs in specific areas and mentioned Route 1 and the southern part of the County.

Participants discussed a variety of regulatory and process barriers to providing services. Participants mentioned intake and service availability delays that impair their organizations' ability to house clients. Participants suggested that central intake and application processes would be helpful for assisted living (to streamline and make access more equitable) and for victims of domestic violence. Participants suggested assistance that has more flexible use and eligibility requirements would allow for more nimble direction of funds and support in an increasingly difficult market. They also suggested locally administrated Tenant Based Rental Assistance (TBRA) and supportive housing would be helpful. They also discussed homelessness diversion and prevention efforts as being more effective in the current market.

Participants emphasized support services are critical to successful housing outcomes. Many mentioned the need for permanent supportive housing, but indicated supportive services are hard to fund and workers providing services are scarce. Participants suggested system-wide coordination and efficiencies gained from more sophisticated coordination could help alleviate

the shortage, but that more funding would be necessary to adequately compensate workers and attract enough workers to the field.

Participants also described service gaps: home modification for seniors and people with disabilities, legal services to address guardianship and power-of-attorney needs, domestic violence and trauma informed services in shelters, programs to help people (young and elderly) transition out of nursing home facilities, accessibility modifications for renters, support for maintenance needs that are outside of the usual scope of property management (moving furniture, changing light bulbs), and job training (Workforce, Innovation, Skills Hub (WISH) cited as an example). Participants also discussed a broader need for ongoing training, education and moral support for clients once they are housed and receiving services. They discussed support for career advancement, training regarding rights (tenant, accessibility, fair housing, etc.), mentoring, and general effort to allow people to keep advancing. One participant noted ongoing counseling is needed for homeowners, especially new homeowners, in crisis (major systems failure and no cash to fix it) and support for older, often disabled homeowners that need to transition out of their family home. Finally, one participant discussed the enormous need for home repairs that are far larger than service organizations can address (weatherization, County home repair services).

Participants also discussed the need for more case managers, especially clinical case managers. They explained some services fall outside of eligible expenses, but are provided despite lack of funding which strains organizations and providers. Participants specifically suggested crisis support teams for extremely low-income clients.

### *Organization Needs*

Many participants discussed service gaps and difficulties providing services in the context of staff shortages. Participants explained they have a hard time finding staff because they are unable to offer enough compensation and job stability to compete with other jobs, particularly those offering remote work opportunities. They explained that funding for client support services and program administration is insufficient and unstable, leading to staffing challenges. Some participants even described housing and food insecurity among staff and suggested staff should be paid a living wage. Participants suggested people in supportive service occupations are burnt-out and interest in vacant positions is very low. Participants also described negative outcomes of staff shortages including inability to mobilize resources and bottlenecks in the system. One participant gave an example: they explained hotels are full because there is not enough case management and support resources to maintain continuity of service and keep people moving onto permanent housing. Some participants cited difficulty supporting group homes for persons with intellectual disabilities, even though they have increased efficiency of staff by reducing staff travel between homes. Other participants mentioned location of housing affects travel distances of support staff and as a result, their productivity. Another participant mentioned locating new housing near supportive services is helpful for both clients and service providers.

Participants also discussed challenges in providing services in the context of worsening conditions and insufficient funding. They observed racial and socioeconomic disparities



worsening and mentioned pockets of poverty in Route 1, Culmore, Herndon and Centreville. They explained many clients have not financially recovered from COVID and described unemployment, long waiting lists for housing and services, ongoing transportation challenges impacting work, as well as worsening food insecurity. One participant described raising funds to meet additional demand and working long hours, uncompensated, to deploy those funds. This example is indicative of the staffing shortages experienced by participants more broadly.

Participants had fewer requests for emergency rental assistance because of funding created to respond to COVID, but qualified that funding was unevenly distributed, Hispanic populations received less funding, and access to funding took longer. A participant also noted COVID infections were also higher in the Hispanic population, due in part to their service-related employment and prominence in the mandatory workforce. Participants anticipated the increasing need for rental assistance and increasing numbers of households experiencing homelessness as COVID-related assistance wanes.

Participants suggested reduced administrative burden such as reporting and documentation requirements along with more user-friendly and streamlined reporting programs could alleviate the staffing shortage to some degree, by freeing up staff time. However, participants expressed overwhelming need for more funding for greater compensation that will attract people to the field. They further explained funding for administration, management and services does not keep up with the funding for new units.

Participants discussed policy, political, and market contexts impacting housing. Participants identified zoning as a barrier for affordable housing and housing equity. They also discussed incompleteness of efforts to combat discrimination in housing, citing exemptions in Virginia's source of funds law as complicating enforcement, discrimination in lending and need for more education and equity testing. They also cited tenant laws as favoring landlords in Virginia and fewer opportunities and mechanisms for tenant organizing in Virginia. Participants suggested policy makers at the local and state levels are not making decisions based on the needs of their constituents and emphasized policy changes are required to close the housing gap and address ongoing equity issues in the county. Some participants discussed more disruptive/brand new/progressive policy needs and one cited the European social housing approach. Someone suggested rent control or other mechanisms to slow escalation of housing prices may be needed.

#### *Additional data and analysis needs*

Participants reviewed high-level plan data and analysis. Many participants confirmed households and individuals identifying as Black or African American are overrepresented in the populations they serve. Participants also confirmed households identifying as Hispanic were overrepresented. Though many participants confirmed data matched their experiences and observations, they noted the data cannot portray the intricacy of individual experiences.

Participants identified a number of additional subpopulations that are overrepresented in the populations they serve, need additional attention, or for whom it would be helpful to have more

data. These groups include seniors, LGBTQIA, individuals 18-24 (TAYS), people who are couch surfing (especially among young people and veterans), justice-involved individuals, veterans, people who are hospitalized but cannot be discharged because they do not have an appropriate placement, people living in mobile home parks slated for redevelopment, the population of immigrants, people aging out of foster care, people with poor credit, people with no or expired documentation, people with a substance use disorder (SUD) and people with mental illness.

Participants also explained data is siloed in ways that may distort the overarching context or factors that complicate housing challenges. For example, participants cited the co-occurrence of homelessness and disabilities as a need for additional quantitative analysis. Participants also suggested analysis by age group would be useful. Participants desire more holistic data that is regularly accessible for decision making, advocacy and raising awareness. One participant suggested the PIT data needs to be supplemented to provide detailed information about individuals and households experiencing homelessness.

A number of participants suggested continued planning and research should be undertaken and policies and programs should be refined to address root-causes of housing instability and racial disparities. They described transportation, land use, history of exclusion manifested in the built environment, and benefits cliffs among other root-causes and complicating factors. They explained awareness of housing instability and racial disparity is a key component of addressing root causes and many participants mentioned raised awareness, outreach and community engagement as an ongoing need.

## **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:***

- ***Date(s) of public notice for public hearing: 12/16/2022***
- ***Date(s) of public notice for public comment period: 1/13/2023***
- ***Public comment period: start date - 1/13/2023 end date - 2/3/2023***
- ***Date(s) of public hearing: 1/10/2023***

***Describe the public participation process:***

After engaging in the consultation process required by HUD, the Department of Housing and Community Development prepared proposed allocations of the HOME-ARP funding. These proposed allocations were incorporated into the Notice of Public Hearing and this notice for a public hearing to be convened by the Consolidated Community Funding Advisory Committee on January 10, 2023, was made public on December 16, 2022. The notice was published in newspapers with diverse circulations (*The Washington Times*, *El Tiempo Latino*, and *Hoa Think Don Viet Bao* – a Vietnamese language newspaper) and put on the County and Fairfax County Redevelopment and Housing Authority web sites. It was disbursed to be made available for viewing at Fairfax County’s 22 libraries, at community centers, and at senior centers.

Comments received as part of the public hearing process were accepted and preparation of the Proposed HOME-ARP Allocation Plan was completed. An Official Notice of Public Comment Period was made public on January 13, 2023.

***Describe efforts to broaden public participation:***

Continuing efforts are made to broaden citizen participation by expanding the methods of providing public notices of citizen participation opportunities. Specifically, Fairfax County’s efforts include having its Notice of Public Hearing and Official Notice of Public Comment printed in a newspaper of general circulation as well as in two non-English language newspapers. The County also made use of social media, specifically Facebook, and a blog on the Fairfax County Redevelopment and Housing Authority web site. In addition, a direct email was sent to over 400 individuals/organizations inviting them to the public hearing. Recipients included nonprofit providers of affordable housing and human services; County agencies, boards, commissions and advisory groups; and potentially affected stakeholder organizations in the county. A request was made to partnering agencies to forward the notice to interested persons and organizations as well.

***Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:***

A number of hearing participants urged the county to increase funding for home repair and modification for low-income homeowners. Each of these participants described their relationship with Rebuilding Together, a non-profit serving Arlington, Fairfax and Falls Church and

recounted the organization's effectiveness in addressing critical home repair and modification needs, but explained that the organization and the county's Home Repair for the Elderly and Disabled Program cannot meet the extent of the need for critical home repair and modification in the county. Participants cited need demonstrated through calls and requests to Rebuilding Together, service limitations due to funding, as well as national trends of increasing home repair and modification needs. In addition to needed funding, many participants urged the county to include housing affordability and stability among homeowners in County plans.

One participant urged the county to dedicate funding for undocumented immigrants citing increasing housing and related service needs. The participant cautioned that undocumented immigrants are likely to remain unserved unless programs and funding are specifically dedicated to the population.

Representatives from Cornerstones were present and expressed support for the HOME-ARP Allocation proposal presented in advance of the public hearing. Representatives emphasized the importance of affordable housing planning and investments, especially needed investments in permanent housing and supportive services as well as ongoing tenant based rental assistance.

One participant offered information about their company greenhouse product that includes technology for food cultivation. The participant suggested that this technology could be applied to help address homelessness.

Participants discussed the real-estate tax burden carried by non-profits ineligible for County tax abatement. They emphasized that real estate taxes are a significant part of their operating costs and that the organization could benefit greatly from either grants to pay taxes or tax abatement.

During the public comment period on the Proposed HOME-ARP Allocation Plan, one nonprofit organization commented that the production goal of 88 affordable rental housing units from this funding source is specifically tied to permanent supportive housing, which by definition would provide housing for those with qualifying disabilities. The commenter noted that seniors are presenting themselves at shelters and have been engaging in many more preventive services trying to avoid eviction and relocation that can lead to homelessness, and stated that a majority of seniors are categorized in the under 30 percent AMI income category and will be a missing population, as they may not be qualified under the disability definitions as required under permanent supportive housing.

HCD responded by stating that older adults, or seniors, are not categorically excluded from permanent supportive housing. Some older adults in Fairfax County are experiencing chronic homelessness with serious disabilities or chronic illnesses and they usually have a household income below 30 percent of AMI. Secondly, the new permanent supportive housing under this HOME-ARP Allocation Plan would have a preference for people experiencing homelessness, including older adults, and prioritized for people defined as chronically homeless, including

older adults. All the HOME-ARP qualifying populations, including the older adults, would remain eligible for the housing, though not as a preference or prioritized.

The nonprofit also commented that the statement in the plan that says Fairfax County will not limit eligibility for HOME ARP rental housing or non-congregate shelter, seems to be incongruent with the goal statement that the 88 affordable rental housing units will be in the form of permanent supportive housing. According to the nonprofit, permanent supportive housing by definition would limit eligibility to those with a disability, and may disqualify many seniors unless they have a qualifying disability.

HCD responded by stating that “permanent supportive housing” takes many formats and serves a wide variety of populations that need supportive services paired with deeply affordable housing. The permanent supportive housing funded by the HOME-ARP program does not require tenants to have disabilities for admission. While people defined as “chronically homeless” will be prioritized, the other qualifying populations remain eligible.

Fairfax County also received general inquiries into the nature of the program and asking for clarification regarding the future process for the availability of funds.

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

All comments and recommendations were accepted and no adjustments were made to the proposed funding allocations.

## Needs Assessment and Gaps Analysis

The Homeless Needs Inventory and Gap Analysis tables include data from the 2022 Point-In-Time count (PIT) and Housing Inventory Count (HIC). The number of individuals and households experiencing homelessness may vary depending on when the data was collected. Therefore, the gap analysis shown below does not give the full picture. The rapidly changing job market and housing market since the COVID-19 pandemic may have fluctuated the demand for housing assistance. Likewise, the housing demand inventory is subject to seasonal fluctuations. For example, extra beds are added to shelters for the homeless in winter. It should be emphasized that quantitative analysis using point-in-time data certainly helps to shed light on gaps, but not all. Qualitative analysis, such as stakeholder interviews that were additionally conducted, helps to further understand the gap.

Although the current inventory appears to exceed the homeless population, people continue to experience homelessness in the county. Given the constraints in identifying households experiencing homelessness it is inevitable that the population of people experiencing homelessness is underestimated. Rather than a simple, direct comparison of HIC to PIT, the Homeless Needs Gap Analysis and subsequent discussion of household experiencing chronic homelessness seeks to evaluate whether there are sufficient services tailored to the needs of people and households experiencing homelessness. Out of individuals currently (accessed September 2022) experiencing literal homelessness: in transitional housing, street outreach, day shelter and emergency shelter programming, 246 people are identified as likely to be experiencing chronic homelessness. Furthermore, the number of unsheltered and chronically homeless individuals have not decreased at the same rate as other sub-populations. Compared to the recent 5-year average (2017-2021), chronic homelessness increased by 34.8 percent, while non-chronic homelessness increased by 8 percent in 2022. Therefore, this analysis identifies the chronic homelessness of the 246 people identified as a minimum gap and further identifies a variety of need through in-depth consideration of available data and feedback from organizations and agencies who participated in the consultation process.

Participants in the consultation process emphasized support services are critical to successful housing outcomes. Many mentioned permanent supportive housing as the most critical need, but emphasized that supportive services are hard to fund and workers providing services are scarce. Participants also discussed the importance of outreach and case management in identifying households experiencing homelessness and the ongoing support required access and retain housing. For full details please see the “*Housing and Services Gaps*” discussion in the consultation summary above.

## OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	384	143	165	-	0								
Transitional Housing	169	60	31	-	0								
Permanent Supportive Housing	151	40	518	518	103								
Other Permanent Housing	194	141	237	221	8								
Sheltered Homeless						166 households (608 people)	176	9	97 households (199 people)				
Unsheltered Homeless						0	345	22	0				
<b>Current Gap</b>										See discussion of chronic homelessness below.			

**Data Sources:** 2022 Point-in-Time Count (PIT) & Continuum of Care Housing Inventory Count (HIC)

### *Chronic Homelessness*

Of the 246 households experiencing chronic homelessness, 4 percent are persons in families (11 people), and 235 (96 percent) are adult only households. Based on turnover rates in permanent supportive housing programs in Fairfax in fiscal year 2021 (July 1, 2020-June 30, 2021), it would take the system at least 16 months to house the current eight family households and nearly four years to house the 235 current single households in permanent supportive housing programs. However, a point in time count does not include the average inflow of those experiencing chronic homelessness, which average 28 individuals a month which compounds the bottleneck of housing resources.

Adult only households experiencing chronic homelessness are predominantly served in Street Outreach programs and day drop-in centers (82 percent) meaning that in addition to experiencing longer lengths of homelessness and having an on-going disability, individuals are facing the elements related to unsheltered homelessness. Only 15 percent of those experiencing chronic unsheltered homelessness have attempted to access shelter assessment. Except for participants in transitional housing, individuals identified as chronically homeless tend to spend on average 45 days longer in the homeless services system due to lack of resources than clients not experiencing chronic homelessness. Providing a direct route to Permanent Supportive Housing would likely both chronic homelessness and unsheltered homelessness in Fairfax County.

1. Current Inventory from HIC (September 2022)
  - 1) Emergency Shelter

- **Family ES Projects (Total Beds: 384. Total Units: 143):** Bethany, Next Steps, Patrick Henry, Embry Rucker, Katherine Hanley. Artemis R1 and R3. No QPID.
  - **Singles ES Project (Total Beds: 165):** Medical Respite R2 and R3, APS Shelter, Kennedy, Mondloch House, Baileys, Embry Rucker. Artemis R1 and R3.
- 2) Transitional Housing
- **Families Projects (Total beds: 169, Total Units: 60):** Safe Places, Homestretch, Second Story AYM, SH DV TH.
  - **Singles Projects (Total Beds: 31):** Second Story HYI, Second Story RHY.
- 3) Permanent Supportive Housing
- **Families Projects (Total Beds: 151, Total units: 40):** Milestones, Kate’s Place, SH RISE, and VASH.
  - **Singles Projects (Total Beds: 518 Total Units: 518):** Linda’s Gateway, Triumph, Triumph III, Gartlan, Max’s, Baileys Supportive Housing, Home Connections, Housing First, Mondloch Place, All Pathways (12 projects), PRS 1994, PRS 1995, and VASH.
- 4) Other Permanent Housing
- **Families Projects (Total Beds: 194 Total Units:141)**
  - **Singles Projects (Total Beds:237 Total Units: 221)**

2. Homeless Population from PIT (September 2022)

1) Sheltered Homelessness -Family (166 Households, 608 people)

Project	# of Clients	# of Households
Emergency Shelter	219	51
Motel Overflow	188	52
DV Emergency Shelter	109	30
Transitional Housing	92	33
Total	608	166

2) Sheltered Homelessness -Single (176 people)

Project	# of Clients	# of Households
Emergency Shelter	130	130
DV Emergency Shelter	23	23
Transitional Housing – All Youth Programs	23	23
Total	176	176

3) Unsheltered Homelessness

- **Family (Total People: 0)**
- **Singles (Total People: 345)**



The area median income (AMI) in Washington-Arlington-Alexandria MSA, where Fairfax County, Fairfax City and Falls Church City are located, is \$142,300. The HUD 2022 30 percent of AMI standard for a family of four in the region is \$42,700 and the 50 percent of AMI guideline is \$71,150 for a family of four.

The differences between tenants experiencing at least one severe housing problem and the current inventory by income level were estimated as the housing gap for the non-homeless populations.

A severe housing problem is defined as:

1. Housing unit lacks complete kitchen facilities.
  - a. A complete kitchen consists of a sink with a faucet, a stove or range, and a refrigerator.
2. Housing unit lacks complete plumbing facilities.
  - a. Complete plumbing consists of hot and cold running water, a flush toilet, and a bathtub or shower.
3. Severe overcrowding, that is, more than one and half people per room.
4. Household is cost-burdened, spending over 50 percent of their income on housing costs.

According to the 2014-2018 Comprehensive Housing Affordability Strategy (CHAS) data, there are 136,080 rental housing units in the county, Fairfax City and Falls Church City. Of these, 7 percent, or 9,410 units (7.0 percent) are affordable to households earning less than 30 percent of AMI, and 16,975 units (12.5 percent) are affordable to households earning less than 50 percent of AMI. Among the renter households with one or more severe housing problem, 16,440 households have less than 30 percent of AMI, and 26,310 households have less than 50 percent of AMI. Current inventory cannot fully cover tenants with severe housing problems. At levels below 30 percent of AMI, 7,030 rental units are identified as needed. At levels below 50 percent of AMI, 9,335 rental units are identified as needed.

**OPTIONAL Housing Needs Inventory and Gap Analysis Table**

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	# of Units	# of Households	# of Households
Total Rental Units	136,080		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	9,410		
Rental Units Affordable to HH at 50% AMI (Other Populations)	7,565		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		16,440	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		9,870	
<b>Current Gaps</b>			(9,335)

**Data Source:** 2014-2018 CHAS, Fairfax County, Fairfax City, and Falls Church City

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

***Homeless as defined in 24 CFR 91.5***

A count of people who are experiencing homelessness is conducted annually in accordance with HUD guidelines, and includes people who are homeless in shelters, in time-limited transitional housing programs, and unsheltered and living on the street. Conducting the enumeration requires extensive efforts by a wide range of community partners, involving dozens of staff and volunteers from public and private nonprofit organizations that work with people experiencing homelessness in the Fairfax–Falls Church community.

Fairfax County, in coordination with the surrounding Washington, D.C. Metropolitan area, conducted its 2022 Point-In-Time Count of individuals and families experiencing homelessness on January 26, 2022. This highly coordinated effort provides critical data on the numbers of residents living in shelters, in time-limited transitional housing programs as well as those unsheltered and living on the street in the Fairfax-Falls Church community. There were 1,191 people experiencing homelessness on the night of the 2022 Point-in-Time Count. This is a decrease of 3 percent (31 people) from the 2021 Point-in-Time Count, in which there were 1,222 people identified as experiencing homelessness. The details of the 2022 Point-in-Time Count are as follows.

- Subpopulations
  - Chronic Homelessness: There were 282 adults identified as experiencing chronic homelessness during the 2022 Point-in-Time Count (33 percent of the total adults counted).
  - Veterans: There were 32 people that identified as veterans during the 2022 Point-in-Time Count (4 percent of the total adults counted).
  - Transition Age Youth (18-24): There were 91 transition aged youth identified during the 2022 Point-in-Time Count (11 percent of the total adults counted).
  - Survivors of Domestic Violence: There were 115 households identified as currently fleeing domestic violence and 220 households that reported a history of domestic violence during the 2022 Point-in-Time Count (15 percent and 28 percent of total households counted).
  
- Demographics
  - Race: The most significant disparity in the demographics of those experiencing homelessness on the night of the 2022 Point-in-Time Count is the disproportionate representation of people identifying as Black or African American. Although only 10 percent of the general population in Fairfax County identifies as Black or African American, 50 percent of the people experiencing homelessness on the night of the 2022 Point-in-Time Count identified as Black or African American. This imbalance has not improved over time.

- Age: There were 30 individuals aged 70 years and above experiencing homelessness on the night of the 2022 Point-in-Time Count (3 percent of the total adults), including an individual in emergency shelter at the age of 96 years old

***At Risk of Homelessness as defined in 24 CFR 91.5***

Estimating at-risk of homelessness may vary by definition. The definition in 24 CFR 91.5 is used to properly estimate this population. According to the Code of Federal Regulations 91.5, at-risk of homelessness is defined as:

(1) An individual or family who:

- (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- (ii) Does not have sufficient resources or support networks, *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph one of the “Homeless” definition in this section; and
- (iii) Meets one of the following conditions:
  - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
  - (B) Is living in the home of another because of economic hardship;
  - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
  - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
  - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
  - (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
  - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

- (3) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

A variety of methods can be used to estimate the number of individuals at-risk of homelessness. However, there are restrictions on the availability of data depending on the item. In addition, estimating and summing each item may cause overstatement. This plan uses recent Comprehensive Housing Affordability Strategy (CHAS) data to adequately calculate its population as defined by household who has an annual income below 30 percent of median family income for the area.

The 2014-2018 CHAS data indicates that 35,260 households meet the above definition for at risk of homelessness. This accounts for 8.64 percent of total households.

- 22,595 households, 17.30 percent of total renter households, have an income of 30 percent of AMI or less.
- 12,665 households, 4.58 percent of total owner households, have an income of 30 percent of AMI or less.

Due to the limitations of available data, households with incomes below 30% of AMI represent the minimum estimate for this population.

### Households by Tenure

	<30% of AMI	30–50% of AMI	50–80% of AMI	80–100% of AMI	>100% of AMI	PJs Total
Total Households	35,260	30,675	19,380	30,755	292,185	408,255
Renter Households	22,595	16,660	9,255	14,420	67,670	130,600
Owner Households	12,665	14,015	10,125	16,335	224,515	277,655

**Data Source:** 2014-2018 CHAS, Fairfax County, Fairfax City, and Falls Church City

Households identifying as Black/African American or Hispanic are disproportionately represented in the at-risk of homelessness group. While Black/African American households make up 15.2 percent of renters and Hispanic households make up 18.9 percent of renters, Black/African American households and Hispanic households represent 20.6 percent and 24.3 percent, respectively, of extremely low-income households, suggesting that they are more likely to be at-risk of homelessness. Households identifying as Asian are also disproportionately represented but to a lesser degree.

### Risk by Race/Ethnicity (<30% of AMI)

	Total Renter	<30% of AMI
White	44.8%	30.5%
Black / African American	15.2%	20.6%
Asian	16.6%	18.8%
Hispanic	18.9%	24.3%

Other Races	4.5%	5.8%
Total	100%	100%

**Data Source:** 2015-2019 ACS PUMS, Fairfax County, Fairfax City, and Falls Church City

Project HOPE-Virginia, which is Virginia’s Program for the education of homeless children and youth, provides information about students experiencing homelessness. Title IX, Part A of the *Every Student Succeeds* Act defines homelessness as living in the following places due to a lack of a fixed, regular, and adequate nighttime residence.

- In an emergency or transitional shelter
- In a motel, hotel, or campground due to lack of an adequate alternative
- In a car, park, public place, bus or train station, or abandoned building
- Doubled up with relatives or friends due to loss of housing, economic hardship, or a similar reason
- In the above conditions and is a migratory child or youth
- Further descriptions of nighttime residence  
(<https://education.wm.edu/centers/hope/homeless/nighttime.docx>)

This definition of homelessness applies to children and youth with:

- Uncertain housing
- A temporary address
- No permanent physical address

According to the statistics from Project HOPE, 1,197 students in Fairfax County were identified as homeless in school year 2020-2021. This number exceeds the total homeless population measured in the 2022 PIT. Considering that only 166 households with children are sheltered, it is expected that a significant number of households with children are not identified as homeless or are unsheltered in the PIT count which includes only children who meet HUD's definition of homelessness.

### Homeless Children

Division #	Name	# of Enrolled Students Identified
029	Fairfax County Public Schools*	1,186
109	Falls Church City Public Schools	11

**Data Source:** Project HOPE Virginia 2020-21 school year

\* Towns of Vienna, Herndon, and Clifton are included in Fairfax County Public Schools. No information is provided for Fairfax City Public Schools as there are fewer than 10 homeless children.

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

According to the 2022 Point-in-Time count, 115 households were identified as actively fleeing domestic violence and 220 households have a history of domestic violence. But the evidence shows that there are far more victims. According to the Virginia Department of Criminal Justice

Services, there were 9,567 reported cases of intimate partner violence in Fairfax County between 2015 and 2019.

In FY 2022, the Fairfax County Police Department responded to 3,257 domestic violence calls, including 336 calls through Lethality Assessment Program (LAP). In FY 2022, there were also 168 arrests made due to strangulation, a 32 percent increase from FY 2021. Thirty-six percent of homicides in Fairfax County this year were due to domestic violence, and Fairfax County's Forensic Assessment and Consultation Team (FACT) conducted 721 sexual assault examinations in FY 2022, an average of 82 exams each month.

Each month in Fairfax-Falls Church community, domestic and sexual violence hotlines receive over 155 calls on average, victims request 75 family abuse protective orders, and 14 families escape to an emergency domestic violence shelter. In FY 2022, 120 families who needed emergency domestic violence shelter were placed in hotels.

During school year 2021-2022, Fairfax County received 33,479 responses to its Youth Survey, representing 76.1 percent of all public-school students enrolled in grades 8, 10 and 12 (Fairfax County, 2022). According to the survey, almost one in three students (32.3 percent) reported that a language other than English is primarily spoken in their home and approximately 25 percent of the Youth Survey respondents identified themselves as Hispanic/Latino (County of Fairfax, 2022). The results of the survey show disparate outcomes for youth who speak Spanish at home as it relates to the categories of "dating aggression" and sexual assault. More information regarding the Youth Survey and analysis can be found at the following web address: <https://www.fairfaxcounty.gov/data/youth-survey>.

***Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice***

**1. Other Families Requiring Services or Housing Assistance to Prevent Homelessness**

This is defined as households (i.e., individuals and families) who have previously been qualified as "homeless" as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

According to the HUD's System Performance Measures for Continuum of Care, 11 percent of persons returned to facilities (Street Outreach, Emergency Shelter, Safe Haven, and Transitional Housing, and Permanent Housing project types) in 6 months after exit to permanent housing destinations in 2021.

## 2. At Greatest Risk of Housing Instability

At greater risk of housing instability is defined as household who meets either paragraph (i) or (ii) below:

(i) 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);

(ii) 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:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

This plan uses recent CHAS data to determine the qualifying population. Among the definitions of at greatest risk of housing instability outlined above, (1) households with less than 30 percent of AMI and experiencing severe cost burden and (2) households with less than 50 percent of AMI and living in more than 1.5 person per room are identified.

24,449 households with less than 30 percent of their area median income, spend more than 50 percent of their income on housing. This accounts for 5.99 percent of total population of Fairfax County, Fairfax City and Falls Church City. Among renter households, 15,645 households are extremely low-income households who experience severely cost-burdened, accounting for 11.98 percent of total renter households. Among owner households, 8,804 households are extremely

low-income households that experience severely cost-burdening, accounting for 3.17 percent of total owner households.

**Severely Cost-Burdened**

	<30% of AMI	30–50% of AMI	50–80% of AMI	80–100% of AMI	>100% of AMI
Total	24,449	13,245	3,884	2,784	3,129
Renter Households	15,645	7,795	1,394	580	410
Owner Households	8,804	5,450	2,490	2,204	2,719

**Data Source:** 2014-2018 CHAS, Fairfax County, Fairfax City, and Falls Church City

Households identifying as Black/African American or Hispanic are disproportionately represented in the at greatest risk of housing instability group. While Black/African American households comprise 15.2 percent of renters and Hispanic households comprise 18.9 percent of renters, Black/African American and Hispanic households represent 20.1 percent and 29.8 percent, respectively, of extremely low-income households experiencing severely cost burden, suggesting that they are more likely to be at risk of housing instability.

**Risk by Race/Ethnicity (Severely Cost-Burdened with <30% of AMI)**

	Total Renter	Severely Cost-Burdened with <30% of AMI
White	44.8%	30.6%
Black / African American	15.2%	20.1%
Asian	16.6%	14.4%
Hispanic	18.9%	29.8%
Other Races	4.5 %	5.1%
Total	100%	100%

**Data Source:** 2015-2019 ACS PUMS, Fairfax County, Fairfax City, and Falls Church City

1,939 households with less than 50 percent of their area median income, reside in more than 1.5 person per room. This accounts for 0.47 percent of total population. Among renter households, 1,794 households are extremely low- or very low-income households who experience severely overcrowded, accounting for 1.37 percent of total renter households. Among owner households, 145 households are extremely low- or very low-income households who experience severely overcrowded, accounting for 0.05 percent of total owner households.

**Severely Overcrowded (With>1.5 people per room)**

	<30% of AMI	30–50% of AMI	50–80% of AMI	80–100% of AMI	>100% of AMI
Total	1,270	669	304	495	1,214
Renter Households	1,165	629	259	440	935
Owner Households	105	40	45	55	279

**Data Source:** 2014-2018 CHAS, Fairfax County, Fairfax City, and Falls Church City



***Describe the unmet housing and service needs of qualifying populations:***

***Homeless as defined in 24 CFR 91.5***

As of January 2022, of the 1,191 homeless persons who need assistance, 95 percent received aid from county assistance programs, and households with children are all assisted by these programs. In total, 57 persons (5 percent of homeless persons) are unsheltered. However, since this figure is based on the PIT, the number of people experiencing homelessness would be higher than this. For example, the county identified 345 unsheltered homelessness in September 2022. This means that estimates may vary depending on the timing of survey. Moreover, considering that the average days in emergency shelter over the past five years is 83.6 days, a greater number of people experiencing homelessness is unsheltered.

***At Risk of Homelessness as defined in 24 CFR 91.5***

According to the HUD definition, the criteria for individuals and families who are at imminent risk of experiencing homeless is when an individual or family will imminently lose their primary nighttime residence, provided that their residence will be lost within 14 days of the date of application for homeless assistance; no subsequent residence has been identified; and the individual or family lacks the resources or support networks needed to obtain other permanent housing. Currently this population is predominately represented by individuals and families whose housing stability has been impacted by the COVID-19 pandemic. According to the County Executive's presentation to the Board of Supervisors for the FY 2022 Advertised Budget Plan, the December 2020 number of jobs in Northern Virginia decreased by 67,700 or 4.4 percent from December 2019. Economic pain has been concentrated in lower wage sectors, such as Leisure and Hospitality jobs, which decreased 22.3 percent. In Fairfax County, the December unemployment rate was 4.4 percent, much higher than the December 2019 rate of 1.9 percent, though lower than the April 2020 high of 10.2 percent.

The most prominent population characteristic of people experiencing literal homelessness is extremely low income. Clearly families and individuals experiencing homelessness are on the lowest rung of the economic ladder when their income is below 30 percent of AMI. According to the 2014-2018 CHAS, 33,935 households in Fairfax County had incomes below 30% AMI, which could potentially become homeless. Formerly homeless families and individuals who are receiving rapid re-housing assistance and are nearing the termination of that assistance generally continue to have extremely low incomes under 30 percent of the Area Median Income and are competing in a tighter rental housing and employment market, often with recent blemishes to their credit and rental history.

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

The county provides housing and services to domestic violence survivors. The county has funded the Safe Places Transitional Housing program by Christian Relief Services Charities, Inc. since FY 2003 to provide safe affordable housing for up to 2 years and trauma-informed supportive services. In FY 2022, the program served 23 households, including 30 children. Five of those households exited the program in FY 2022 and four of them (80 percent) obtained permanent housing. In FY 2021, the county began funding the Culturally-Sensitive Services for Domestic Violence (Culturally-Sensitive Services) program by the Greater Washington Jewish Coalition Against Domestic Violence to provide trauma-specific services for domestic abuse survivors aged 14 and older, including counseling, legal representation, advocacy and community educational workshops. During FY 2022, 32 clients/households that participated in the education program had decreased levels of risk of abuse, neglect, and exploitation. In addition to the provision of such emergency shelter and trauma-informed services, the county is working to more fully integrate offender services into the coordinated community response to domestic violence incidents in ways that increase safety and options for victims.

The county provides rapid rehousing programs (RRH) and permanent supportive housing (PSH) that provide a continuation of services for survivors as they move from shelter to more permanent housing. Immediate access to the RRH options would give victims up to 2 years of additional time to fully rebuild their lives with the support of the community. Access to PSH makes both the appropriate level of ongoing wrap-around services and a permanent housing subsidy available to domestic violence survivors when they exit Artemis House (a 24-hour emergency shelter for Fairfax County residents who are victims in danger of domestic and sexual violence, stalking, and human trafficking. Both housing interventions operate from a client-centered perspective, promote empowerment and emotional resilience, and focus on the strengths of the survivor to meet needs and achieve goals related to housing stability. Approximately 15 percent of the households in FY 2020 were assessed as needing PSH services and/or a housing subsidy to be successful after exiting the program; however, only one household was granted a permanent housing voucher. On average, only 5 percent of households entering the Artemis House shelter can successfully exit and sustain market-rate housing options.

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

According to the annual Point-in-Time count, the number of unsheltered and chronically homeless individuals have not decreased at the same rate as other sub-populations. Compared to recent 5-year average, chronic homelessness increased by 35 percent, while non-chronic homelessness increased by 8 percent.

Among qualifying populations, Fairfax County has a primary goal of supporting and addressing chronic homelessness. Chronic homelessness is defined as “the circumstance whereby an unaccompanied individual with a disabling condition has either been continuously homeless for a year or more or has had at least four homeless episodes during the last three years”. Based on turnover rates in permanent supportive housing programs in Fairfax County in FY 2021, it would take the system at least 16 months to house the current eight family households and nearly four years to house the current single households in permanent supportive housing programs. However, a point in time count does not include the average inflow of those experiencing chronic homelessness, which averages 28 individuals a month, which compounds the bottleneck of housing resources. Except for participants in transitional housing, individuals identified as chronically homeless tend to spend on average 45 days longer in the homeless services system due to lack of resources than clients not experiencing chronic homelessness. Providing a direct route to Permanent Supportive Housing would make the largest impact on reducing both chronic homelessness and unsheltered homelessness in Fairfax-Falls Church community.

Another challenge facing Fairfax-Falls Church community is the lack of affordable housing. According to the housing affordability gap analysis from Virginia Center for Housing Research (VCHR), the region including Fairfax County, Falls Church City and Fairfax City is experiencing a rental housing shortage for extremely low-income and very low-income households. Rent burdened populations with income 50 percent of AMI or less can be considered at risk of homelessness. To eliminate this potential threat, counties must address the long-term shortage of affordable housing, as well as expand homelessness facilities and programs in the short-term.

VCHR estimated the rental housing affordability gap for Fairfax County, that is, the difference between the number of affordable units needed and the number of available affordable units, using 2014-2018 CHAS. However, the affordability gap can vary depending on the assumption applied. VCHR calculated the housing affordability gap for rental units in three ways.

First, the housing affordability gap can be defined as the difference between total renting households and total rental stock by income level. The gross deficit for extremely low-income households is 12,475 units, and the gross deficit for very low-income households is 8,795 units.

**Rental housing affordability gap – Scenario 1**

<b>Income Range</b>	<b>Total Renting Households</b>	<b>Total Rental Stock</b>	<b>Gross Deficit</b>
<= 30% of AMI	21,675	9,200	12,475
30%–50% of AMI	16,135	7,340	8,795
50%–80% of AMI	8,850	18,400	(9,550)
>=80% of AMI	79,440	94,220	(14,780)

**Data Source:** 2014-2018 CHAS, Fairfax County

The second calculation assumes that households already occupying units in a price range that is affordable to their household income retain their existing occupancy. The first definition of the housing affordability gap is unrealistic because it assumes that all households occupy units in their income range. Households that live in affordable units and retain their occupancy adjusts

the number of households who cannot afford their unit (a) - (b). Housing units currently occupied by the lower income level are not retained and are thus added to the vacant units and counted as available rental stock (c) + (d). Under this scenario, the gross deficit for extremely low-income households is 16,480 units, and the gross deficit for very low-income households is 10,525 units. Affordable housing is not occupied only by specific income levels and, therefore, the numbers are not precise; however, it is the realistic minimum supply that must be added to offer affordable housing to all residents.

### Rental housing stock by income level of occupied households

Renter-Occupied Stock	<= RHUD30	RHUD30– RHUD50	RHUD50– RHUD80	> RHUD80
<=30% of AMI	5,140	2,330	4,140	9,495
30%–50% of AMI	1,245	1,960	3,625	9,015
50%–80% of AMI	585	585	1,895	5,705
80%–100% of AMI	520	805	2,365	10,175
>100% of AMI	1,655	1,585	5,275	56,050
Vacant	55	75	1,100	3,780
Total Available Stock	9,200	7,340	18,400	94,220

Data Source: 2014-2018 CHAS, Fairfax County

### Rental housing affordability gap – Scenario 2

Income Range	Total Renting Households (a)	Total Renters Living in Affordable Stock (b)	Households Without an Affordable Unit (a) - (b)	Occupied by Lower Income Level (c)	Vacant (d)	Available Rental Stock (c) + (d)	Gross Deficit (a) - (b) - (c) - (d)
<= 30% of AMI	21,675	5,140	16,535	0	55	55	16,480
30%–50% of AMI	16,135	3,205	12,930	2,330	75	2,405	10,525
50%–80% of AMI	8,850	3,065	5,785	7,765	1,100	8,865	(3,080)
>=80% of AMI	79,440	78,430	1,010	24,215	3,780	27,995	(26,985)

Data Source: 2014-2018 CHAS, Fairfax County

Finally, housing affordability can be defined as the number of cost-burdened renters (paying more than 30 percent of income on rent) and vacant stock regardless of rental stock. The gross deficit for extremely low-income households is 17,000 units, and the gross deficit for very low-income households is 13,855 units.

### Rental housing affordability gap – Scenario 3

Income Range	Cost Burdened Renters (a)	Vacant (b)	Gross Deficit (a) - (b)
<= 30% of AMI	17,055	55	17,000

30%–50% of AMI	13,930	75	13,855
50%–80% of AMI	6,915	1,100	5,815
>=80% of AMI	14,825	3,780	11,045

**Data Source:** 2014-2018 CHAS, Fairfax County

### Rental housing affordability gap - Total

Income Range	Total Renting Households	Rental Housing Affordability Gap		
		Scenario 1	Scenario 2	Scenario 3
<= 30% of AMI	21,675	12,475	16,480	17,000
30%–50% of AMI	16,135	8,795	10,525	13,855
50%–80% of AMI	8,850	(9,550)	(3,080)	5,815
>=80% of AMI	79,440	(14,780)	(26,985)	11,045

**Data Source:** 2014-2018 CHAS, Fairfax County

*Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:*

In addition to the renter households with income less than 30 percent of AMI or 30-50 percent of AMI and renter households with 1 or more severe housing problems, Fairfax County and its cooperating jurisdictions are concerned about the increased risk of homelessness among the following two groups of renter households: cost-burdened with children and households with a disability.

Housing instability defines as a number of challenges such as having trouble paying rent, overcrowding, moving frequently, or spending the bulk of household income on housing. Extensive research links housing instability to effects on young children's health, development and future school performance. Children living in households without housing instability have better health and educational outcomes. For example, being behind on rent, a history of multiple moves, and a history of homelessness are associated with adverse health outcomes for children of low-income tenants (Sandel et al., 2018). Using available data, we identified the number of households with children that spend more than 30 percent or 50 percent of their income on housing by income level. 7,851 extremely low-income renter households with children spend 50 percent or more of their income on housing. These households are identified as households in need of assistance. Accompanied by appropriate support, it is expected to benefit the physical and mental health of household members and increase children's performance in many aspects (Gaitán, 2019).

### Cost-Burdened Households

	<30% of AMI	30–50% of AMI	50–80% of AMI	80–100% of AMI
With Children				

Cost-Burdened Renter Households	8,910	7,930	3,197	3,815
Cost-Burdened Owner Households	2,673	3,558	2,434	6,584

**Data Source:** 2015-2019 ACS PUMS, Fairfax County, Fairfax City, Falls Church City

### Severely Cost-Burdened Households

	<30% of AMI	30–50% of AMI	50–80% of AMI	80–100% of AMI
With Children				
Severely Cost-Burdened Renter Households	7,851	3,323	396	148
Severely Cost-Burdened Owner Households	2,274	2,220	574	859

**Data Source:** 2015-2019 ACS PUMS, Fairfax County, Fairfax City, Falls Church City

Also, households with a disability are likely to experience housing instability. Households who report anyone of the six disability types below are considered to have a disability.

- 1) Hearing difficulty: deaf or having serious difficulty hearing.
- 2) Vision difficulty: blind or having serious difficulty seeing, even when wearing glasses.
- 3) Cognitive difficulty: Because of a physical, mental, or emotional problem, having difficulty remembering, concentrating, or making decisions.
- 4) Ambulatory difficulty: Having serious difficulty walking or climbing stairs.
- 5) Self-care difficulty: Having difficulty bathing or dressing.
- 6) Independent living difficulty: Because of a physical, mental, or emotional problem, having difficulty doing errands alone such as visiting a doctor’s office or shopping.

### Renter Households with Disability

Renter Households	<30% of AMI	30–50% of AMI	50–80% of AMI	80–100% of AMI
With Disability	5,498	2,131	1,241	2,353

**Data Source:** 2015-2019 ACS PUMS, Fairfax County, Fairfax City, Falls Church City

### *Identify priority needs for qualifying populations:*

Based on the data collected and consultation with community members, all the qualifying populations report serious housing needs, many of which have been worsened by the impact of the COVID-19 pandemic. People experiencing homelessness and those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, present the most urgent housing needs for the Fairfax-Falls Church community as their health and wellbeing is immediately and seriously threatened by the lack of safe, stable housing.

Households at risk of homelessness, other populations at the greatest risk of housing instability, as well as other families requiring services or housing assistance to prevent homelessness, face similar challenges.

### Chronic Homelessness

Out of 996 individuals currently experiencing literal homelessness in transitional housing, street outreach, day shelter and emergency shelter programming in early October 2022, 246 people (25 percent) are likely experiencing chronic homelessness. Of the 246, 11 people are in families (4 percent), and 235 (96 percent) are adult only households. Based on turnover rates in Fairfax County permanent supportive housing programs in in fiscal year 2021 (July 1, 2020-June 30, 2021), it would take the homeless system at least 16 months to house the current eight family households and nearly four years to house the 235 current single households in permanent supportive housing programs. However, a point in time count does not include the average inflow of those experiencing chronic homelessness, which average 28 individuals a month which compounds the bottleneck of housing resources.

Adult only households experiencing chronic homelessness are predominantly served in street outreach programs and day drop-in centers (82 percent) meaning that in addition to experiencing longer lengths of homelessness and having an on-going disability, individuals are facing the life-threatening exposure to the weather and other conditions related to unsheltered homelessness. Only 15 percent of those experiencing chronic unsheltered homelessness have attempted to access shelter assessment. Except for participants in transitional housing, individuals identified as chronically homeless tend to spend on average 45 days longer in the homeless services system due to lack of resources than clients not experiencing chronic homelessness. Providing a direct route to Permanent Supportive Housing would make the largest impact on reducing both chronic homelessness and unsheltered homelessness in Fairfax County.

### ***Explain how the PJ determined the level of need and gaps in the PJs shelter and housing inventory and service delivery systems based on the data presented in the plan:***

Fairfax County determined the level of need and gaps in its shelter and housing inventory and service delivery system based on the quickly rising number of people experiencing chronic homelessness and an inadequate number of emergency shelter or permanent supportive housing beds to meet the need.

## HOME-ARP Activities

***Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:***

Fairfax County will utilize the HOME-ARP funding to support the development and operations of affordable rental housing with supportive services and non-congregate shelter projects currently in the development pipeline. Fairfax County will solicit projects from local organizations that provide permanent supportive housing and non-congregate shelter. Solicitations will follow regular County procurement processes and the applicable laws, including 2 CFR part 200. Solicitations are published on Fairfax County’s website at <https://www.fairfaxcounty.gov/solicitation/> and emailed to known providers of related services. Projects are selected based on the most effective and efficient proposals, based on cost, organizational capacity, and technical details.

***Describe whether the PJ will administer eligible activities directly:***

Fairfax County will largely administer eligible activities directly, although a portion may be allocated to subrecipients or contractors if necessary.

***If any portion of the PJ’s HOME-ARP administrative funds are 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:***

No portion of Fairfax County’s HOME-ARP administrative funds was provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

### Use of HOME-ARP Funding

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 2,102,551		
Acquisition and Development of Non-Congregate Shelters	\$ 2,102,551		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 2,693,894		
Non-Profit Operating	\$ 394,228	5 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 591,342	7.5 %	15%
<b>Total HOME-ARP Allocation</b>	<b>\$ 7,884,566</b>		



***Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:***

In alignment with priority needs identified in the needs assessment and gap analysis, as well as comments made during the consultation process, Fairfax County will utilize HOME-ARP funds to (a) develop affordable rental housing, specifically permanent supportive housing, as well as non-congregate shelter, and (b) support the operations and services of the housing by local nonprofits.

***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:***

An increase in the number of people experiencing homelessness during the COVID-19 pandemic has stretched the existing emergency shelter and affordable housing capacity to its limits. In particular, the increase in people experiencing chronic homelessness has disproportionately increased during the pandemic. This population, according to national research and local experience, requires deeply affordable housing and ongoing supportive services to secure and maintain housing stability. The chronically homeless population also utilizes a disproportionate number of shelter bed nights, which severely limits emergency shelter capacity for everyone experiencing homelessness. Therefore, Fairfax County has identified affordable rental housing in the form of permanent supportive housing, as well as non-congregate shelter, as the primary housing inventory and service delivery system's needs.

## **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:***

Fairfax County estimates that a minimum of 88 affordable rental housing units for qualifying populations will be produced with the support of its HOME-ARP allocation.

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

Creating at least 88 affordable rental housing units in the form of permanent supportive housing will reduce the number of people experiencing chronic homelessness in Fairfax County.

## Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a 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).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

***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:*** Fairfax County intends to give preference to people defined as "Homeless" in 24 CFR 91.5 for projects supported by HOME-ARP funds. Affordable rental housing projects with supportive services will prioritize people defined as "Chronically Homeless" in 24 CFR 91.5.

***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 subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Fairfax County has seen an increase in the number of people experiencing homelessness during the COVID-19 pandemic and the rise is disproportionately higher among people experiencing chronic homelessness. The need for non-congregate shelter and affordable housing with supportive services was identified throughout Fairfax County and is not limited to a specific location. Providing non-congregate shelter, as well as permanent supportive housing, will reduce the number of people experiencing homelessness, as well as chronic homelessness.

***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:***

The HOME-ARP funds will be used to create deeply affordable rental housing with supportive services for which all qualifying populations are eligible, but capacity will be limited based on the available funding. Qualifying populations that are not "homeless" or "chronically homeless" will be served by HOME-ARP supported affordable housing projects if an insufficient number of "homeless" or "chronically homeless" apply for tenancy.

## Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

***Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):*** Fairfax County intends to use multiple referral methods for the projects supported by HOME-ARP funding to ensure that all four qualifying populations have access to HOME-ARP projects and activities. Referrals to HOME-ARP projects and activities may receive indirect self-referrals, indirect referrals from other organizations, and indirect referrals from the Continuum of Care's Coordinated Entry system.

***If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE***

***process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):***

As permitted by HUD's DPD-21-10 notice in section IV. C. 2. iii (as well as the HOME-ARP Policy Brief on Preferences, Methods of Prioritization, and Limitations), HOME-ARP projects will maintain project/activity waiting lists. The projects/activities may receive indirect referrals from the Fairfax County Continuum of Care's Coordinated Entry system along with indirect referrals from outside organizations and self-referrals to the waiting lists.

***If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):***

Fairfax County will use project waiting lists to which individuals, organizations, and Coordinated Entry may indirectly refer. No preferences or prioritization will occur on the project wait lists outside what is referenced in this allocation plan.

***If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):***

Fairfax County will not prioritize between different referral methods.

### **Limitations in a HOME-ARP rental housing or NCS project**

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with

a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

***Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:***

Fairfax County will not limit eligibility for HOME-ARP rental housing or non-congregate shelter.

***If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Not applicable.

***If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):***

Not applicable.

## HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***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. Fairfax County does not intend on using HOME-ARP funds for refinancing.

- ***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.

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.