

## HOME-ARP Allocation Plan Template with Guidance

**Instructions:** All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

### Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- 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.

### Template:

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

Pinellas County developed a robust consultation process to meet HUD’s requirements and to ensure that the County considers all priority needs within the community. On August 31, 2022, September 12, 2022, and October 5, 2022, the County held HOME-ARP consultation/ needs assessment forums to consult with the Continuum of Care, local housing and public service providers, grantee departments, and other groups that work to address the needs of qualifying populations. Approximately 55 participants from various organizations attended the forums. These included representatives from agencies that uniquely serve the qualifying populations under HOME-ARP. Further information about all consultation is detailed in the table below.

To provide an environment that would allow for all attendees to be heard, a multi-faceted approach was used. The first approach was to present an educational PowerPoint that explained the purpose of drafting a HOME-ARP Allocation Plan, the activities and populations eligible for HUD funding, and the schedule that Pinellas County will follow to adopt the Allocation Plan in early 2023. The second approach was to

provide an opportunity for comment during a facilitated discussion. Each consultation/needs assessment forum began with a presentation and ended with a facilitated discussion. Contact information for the process was also provided at each forum.

At two of the consultation/needs assessment forums, discussion was facilitated using a special engagement platform, xLeap, provided by the Collaborative Labs of St. Petersburg College. The xLeap platform allowed for participants to input and prioritize needs electronically in small groups. After the small groups input all their ideas, the small groups chose three top priority needs. All top priority needs from the small groups were shown to all participants as a whole group. Upon reviewing and discussing the needs identified by the small groups as a whole group, attendees again broke out into small groups. From the list of all top-priority needs, the small groups again further identified their top-three priority needs. This approach allowed for a mixing of ideas, collaboration, and two rounds of needs prioritization. In the second round of needs prioritization, each small group was given three votes to select their top priority needs. After all small groups were finished, the votes for each need were aggregated and the priority needs with the most votes were identified. Finally, the forum was closed with a review of the priority needs identified, and participants were given the opportunity to discuss or expand on the results. The results were documented electronically by the xLeap platform and by County staff in attendance.

***List the organizations consulted:***

<b>Agency/Organization Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
Pinellas County Health and Human Services Department	Grantee Department; Services – Health	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Habitat for Humanity	Housing; Other – Services – Housing (Nonprofit)	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Salvation Army - Clearwater	Other – Services – Housing (Non-Profit); Services – Homeless; Services – Employment	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Sunshine Health	Services – Health	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Missio Dei Community	Other – Religious Organization	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Southern Supportive Services	Services – Homeless; Other – Services – Housing (Nonprofit)	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
211 Tampa Bay Cares	Other – Homeless Resource Hotline	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Volunteers of America of Florida	Services – Elderly Persons; Services – Persons with Disabilities; Services – Children; Other – Services – Veterans	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities

<b>Agency/Organization Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
Boley Centers	Housing; Services – Persons with Disabilities; Services – Homeless; Services – Employment; Other – Services – Veterans	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
City of St. Petersburg	Other government – Local; Civic Leaders	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Feeding Tampa Bay	Services – Homeless; Other – Food Assistance	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Bay Area Pregnancy Center	Services – Health; Services – Children	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Juvenile Welfare Board of Pinellas	Child Welfare Agency	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Personal Enrichment through Mental Health Services (PEMHS)	Services – Health; Other – Mental Health/Crisis Intervention	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Pinellas County Community Law Program	Services – Fair Housing; Other – Legal Services/Civil Rights	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
WestCare	Services – Health; Other – Mental Health/Crisis Intervention	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
BayCare	Services – Health	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
St. Petersburg NAACP	Other – Advocacy Organization	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
GFWC Clearwater Community Women’s Club	Other – Community Service Organization	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Homeless Leadership Alliance	Continuum of Care	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Golden Generations	Services – Elderly Persons	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Disability Achievement Center for Independent Living	Services – Persons with Disabilities	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities

<b>Agency/Organization Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
St. Vincent de Paul of South Pinellas	Housing; Services – Homeless; Other – Food Assistance	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Bright Community Trust, Inc.	Housing; Other – Services – Housing (Nonprofit)	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Catholic Charities of St. Petersburg	Housing; Services – Health; Services - Homeless	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
City of Clearwater	Other government – Local	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
City of Largo	Other government – Local	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Brookwood Florida	Services – Homeless; Services – Children; Other – Homeless and At-Risk Youth	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Ready for Life Pinellas	Services – Homeless; Services – Children; Other – Youth Aging Out of Foster Care	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Gulfcoast Legal	Services – Fair Housing; Other – Legal Services/Civil Rights	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
HEP (Homeless Emergency Project/ Homeless Empowerment Program)	Housing; Services – Homeless	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Community Action Stops Abuse (CASA Pinellas)	Services – Victims of Domestic Violence	Consultation/Needs Assessment Forum	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Clearwater Housing Authority	PHA	Direct Email Correspondence	Outreach notification of opportunity for comment
Tarpon Springs Housing Authority	PHA	Direct Email Correspondence	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities
Pinellas County Housing Authority	PHA	Direct Email Correspondence	Outreach notification of opportunity for comment
St. Petersburg Housing Authority	PHA	Direct Email Correspondence	Identification of community needs for qualifying populations, gaps in housing or services, and funding priorities

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

The consultation process resulted in the identification of the following priority needs. Each of these needs were identified several times throughout the consultation process, and those in bold lettering were mentioned most frequently:

- **Permanent supportive housing (PSH)**
- **Affordable rental housing** (most notably PSH, but also SRO and other types)
- **Rental/financial assistance** (including but not limited to short-term/Rapid-Rehousing)
- **Wrap-around supportive services**
  - Skilled/specialty case management (e.g., mental health/substance abuse counseling tied to PSH or shelter services)
  - Affordable childcare, after-school programming, and school engagement
  - Transportation access
  - Workforce development, employment training/mentoring, and related assistance
  - Salary/equity training
  - Food insecurity assistance
  - Services for special needs (including veterans, victims of domestic violence/human trafficking, and persons with disabilities)
  - Housing navigation/counseling
  - Landlord engagement (e.g., eviction prevention/diversion and fair housing)
  - Legal services/documents assistance
- **Non-congregate shelters for individuals and families** (emergency shelter, especially for those populations whose resources are coming to an end)
- Medical respite housing for homeless
- Public housing property rehabilitations (requested by housing authorities)

## **Public Participation**

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

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

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

**Template:**

***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: 10/26/2022***
- ***Public comment period: start date - 11/10/2022 end date - 11/24/2022***
- ***Date(s) of public hearing: 11/9/2022***

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

In accordance with HUD guidelines, Pinellas County held a 15-day public comment period to obtain comments from Pinellas County residents, agencies, and anyone else who wished to review and comment on the HOME-ARP Allocation Plan. Prior to the public comment period, the County held a public hearing on November 9, 2022, to get feedback on the proposed funding activities. The final adoption of the substantial amendment to approve the HOME-ARP Funding Allocation Plan was held at the Board of County Commissioners meeting on January 17, 2022.

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

Pinellas County published public notices for the public hearings and the comment period to broaden public awareness and participation in the development of the HOME-ARP Allocation Plan. A 15-day public comment period is required, which the County held after the public hearing to allow more time for citizens to review the plan and provide comment. Additionally, the County followed its citizen participation plan, which guides all public participation efforts in a manner that promotes transparency and encourages active participation from residents, especially those qualifying populations. The 15-day comment period and public hearing was held after the County's consultation/needs assessment forum campaign, which included three (3) consultation/needs assessment forums with stakeholders that work with qualifying populations.

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

Comments received during the HOME-ARP consultation/needs assessment forums and the public participation process identified an apparent need for affordable rental units (notably permanent supportive housing), rental/financial assistance, wrap-around supportive services, and non-congregate shelter for individuals and families.

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

All comments and recommendations were accepted and considered in the development of the County's HOME-ARP Allocation Plan.

## **Needs Assessment and Gaps Analysis**

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify

any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

**Template:**

***OPTIONAL Homeless Needs Inventory and Gap Analysis Tables – Homeless***

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
Emergency Shelter	380	94	764	N/A	11							
Transitional Housing	87	35	199	N/A	55							
Permanent Supportive Housing	336	88	1,266	N/A	934							
Other Permanent Housing (including Rapid Re-Housing)	549	152	136	N/A	80							
Sheltered Homeless						108	922	285	76			
Unsheltered Homeless						N/A	N/A	N/A	N/A			
<b>Current Gap</b>										N/A	N/A	N/A

**Suggested Data Sources for Current Inventory, Homeless Population and Gap Analysis Tables:** 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

***OPTIONAL Housing Needs Inventory and Gap Analysis Table – Non-Homeless***

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	124,129		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,912		
Rental Units Affordable to HH at 50% AMI (Other Populations)	6,719		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		7,473 (standard housing problems, not severe)	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		7,093 (standard housing problems, not severe)	
<b>Current Gaps</b>			N/A

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

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

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

Homelessness affects all races and ethnicities; however, in Pinellas County white and black individuals are most impacted by homelessness. Of the 1,305 homeless individuals counted in the 2021 Point-In-Time counts for the continuum of care, 716 (nearly 55%) individuals were white, and 515 (over 39%)

of individuals were black. The remaining 6% of homeless individuals identified as other minority races. Only about 5.6% of the total counted homeless population identified as Hispanic or Latino.

More than 70% (924) of all homeless individuals counted were adults in households without children. There were 372 (nearly 29%) homeless individuals counted in households with children, and 9 homeless individuals counted in households that contained only children (under the age of 18).

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

Pinellas County is an exception grantee with a low-and moderate-income threshold of 50.30%. According to HUD's FY 2021 Low- and Moderate-Income Summary Data (LMISD), there are approximately 158,025 low- and moderate-income individuals within the Urban County. This represents over 36% of the Urban County's population according to HUD, and over 16% of the county's total population based on the 2021 American Community Survey 1-Year estimates. Of the county's 431 Block Groups, 108 Block Groups are characterized as having more than 50.30% of the population designated as low- and moderate-income. This suggests that a significant percentage of Pinellas County's population has an income of less than 80% AMI and may be at increased risk of homelessness or in need of additional supportive services and assistance to prevent homelessness and housing instability.

According to 2011-2015 CHAS, there are 1,299 low- and moderate-income households (<80% AMI) that experience crowding of more than 1 person per room. Additionally, there are 8,016 households in the 0-30% AMI income group that are experiencing cost burden greater than 30%, and 7,252 households in the 0-30% AMI group that are experiencing cost burden greater than 50%. Due to crowding, income levels, and cost burdens, the households within these groups are at risk of homelessness.

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

In total, 184 (about 8%) homeless individuals counted identified themselves as victims of domestic violence. According to the Florida Department of Law Enforcement, there were 6,111 domestic violence offenses in Pinellas County alone in 2020. There were also 450 reports of rape in Pinellas County for the same year. Victims of these crimes are susceptible to homelessness and housing insecurity.

### ***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***

The 2021 homeless Point-In-Time count identifies 285 homeless veterans on the date of survey, representing about 22% of the homeless population. According to the 2021 Homeless leadership Alliance HMIS report for the 1-year period between January 1, 2021, and December 31, 2021, it is estimated that there were 1,671 homeless veterans (representing about 20% of the homeless population) within the St. Petersburg, Clearwater, Largo/Pinellas County Continuum of Care. For the previous 1-year period, there were 1,541 homeless veterans counted. Based on this information, approximately 1,500 veterans experience or become homeless each year in Pinellas County.

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

There is a wide array of existing homelessness prevention services available in Pinellas County including counseling, legal assistance, mortgage assistance, rental assistance, utilities assistance, law enforcement,



mobile clinics, street outreach services, drug and alcohol abuse services, childcare, education services, employment and employment training services, healthcare services, life skills training, mental health counselling, transportation services, and food banks.

The Homeless Leadership Alliance of Pinellas (HLA), the lead agency for the CoC, provides homeless services, such as emergency shelter and transitional housing, to qualifying populations in need. In conjunction with HLA, several other non-profit and religious organizations serve the homeless population within Pinellas County. These include, but are not limited to, 2-1-1 Tampa Bay Cares, Inc., Homeless Empowerment Program, Inc. (HEP), Hope Villages of America, Catholic Charities, St. Vincent de Paul South, Directions for Living, Inc., Family Resources, Inc., Salvation Army, Boley Centers, Inc., Florida Resurrection House, Inc., Florida Dream Center, Operation PAR, Inc., Clearwater Free Clinic, Pinellas County Community Development Division, Pinellas County Human Services Department, Pinellas County Housing Authority, Pinellas County Schools (via Homeless Education Assistance Team), Pinellas County Sheriff's Office, and the Department of Veterans Affairs (VA), among others.

To better address the needs of the area's homeless population, the HLA maintains an online map-based directory of emergency shelter and transitional housing services, as well as food and clothing assistance targeted to homeless persons. The database connects to the Pinellas Suncoast Transit Authority route maps. Information regarding homeless resources is also disseminated through the 2-1-1 Tampa Bay Cares, Inc. hotline.

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

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

In Pinellas County, members of the Continuum of Care, such as churches and nonprofit organizations, led by the Homeless Leadership Alliance of Pinellas (HLA), provide homeless services such as emergency shelter and transitional housing. As noted above, some providers include 2-1-1 Tampa Bay Cares, Inc., Homeless Empowerment Program, Inc. (HEP), Hope Villages of America, Catholic Charities, St. Vincent de Paul South, Directions for Living, Inc., Family Resources, Inc., Salvation Army, Boley Centers, Inc., Florida Resurrection House, Inc., Florida Dream Center, Operation PAR, Inc., Clearwater Free Clinic, Pinellas County Community Development Division, Pinellas County Human Services Department, Pinellas County Housing Authority, Pinellas County Schools (via Homeless Education Assistance Team), Pinellas County Sheriff's Office, and the Department of Veterans Affairs (VA), among others.

These organizations work independently and collectively to identify any unmet housing and service needs of qualifying populations. Based on the consultation process, the unmet housing and service needs are additional affordable rental units, specifically permanent supportive housing, rental/financial assistance, wrap-around supportive services, and non-congregate shelter for individuals and families.

Additionally, the 5-Year Consolidated Plan identifies priority needs of the homeless population in Pinellas County, which include mental/behavioral health resources, permanent supportive housing with case management, rapid re-housing, shelters and transitional housing (particularly for families with children), better access to affordable housing (e.g., rental assistance, HCV, etc.), housing for persons leaving prison or with a criminal background, and legal help when improperly evicted. Youth aging out of foster care was also noted as an underserved population needing case management, employment opportunities, and access to affordable housing to bridge the gap between foster care and adult life. The

existing shelters and supportive service providers need additional funding as they work collaboratively to ensure satisfactory provision of services and future expansion of these services for those experiencing homelessness.

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

The 5-Year Consolidated Plan identifies priorities related to persons experiencing homelessness and those at risk of homelessness. Among those needs are mental/behavioral health and substance abuse treatment services, and prevention activities including but not limited to access to employment opportunities, housing assistance/affordable housing, and social and health services geared toward specific subpopulations of homeless persons (e.g., chronically homeless, families with children, veterans, and unaccompanied youth). While there are existing shelters and supportive services for those experiencing homelessness, there may be a need for additional supportive services to prevent homelessness, including transitional housing, emergency assistance and other moving assistance (rental deposit assistance, security deposit), and other rental assistance and utility assistance efforts. These efforts also contribute to the maintenance and availability of affordable housing for all income groups, especially qualifying populations.

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

Populations with unstable living environments may require additional financial assistance, such as rental assistance, down payment assistance, or utility assistance. These groups may also rely on transitional shelters and safe homes for temporary housing. Additional funding for capacity building for organizations that could provide these services would ensure that sufficient and decent housing is available for those that depend on it.

***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***

For non-homeless populations of greatest risk of housing instability, more affordable rental housing units, rental and financial assistance, housing counseling and legal services for eviction prevention, and other related supportive services are also needed to prevent future homelessness.

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

Pinellas County has a robust shelter, housing, and service delivery system for individuals experiencing homelessness and who are at risk of becoming homeless. Some identified gaps may exist, including sufficient funding to support the volume and reach of homeless supportive services (including non-profit service providers that offer substance abuse and mental health services, services for homeless youth, and case management). The County will continue to financially support these programs, when possible, and aid in the identification of additional funding sources, and provide technical assistance to aid in the completion of grant applications.

The County maintains strong relationships with service providers, many of which participated in the consultation/needs assessment forums that informed the HOME-ARP Allocation Plan. The input received from service providers during the consultation process was critical to the identification of

priority needs. Service provider involvement ensures successful programming to lessen the existing gaps in housing and services for qualifying populations.

The County is very engaged with the Homeless Leadership Alliance (HLA) and supports the organization in the implementation of the 10-Year Plan to End Homelessness. Additional improved and maintained coordination between these service providers and the County would benefit those populations at risk of homelessness and those experiencing homelessness by promoting a transparent and accessible communication strategy. Improved coordination would increase the dissemination of information about critical resources and supportive services, as well as improve the quality of those services.

An identified gap is the need for additional permanent supportive housing. In addition to financially supporting the closure of this gap through the HOME-ARP program, one way to reduce this need is for the County to continue to coordinate with the Continuum of Care, non-profit service providers, and other organizations to encourage the development of these types of housing.

***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:***

Housing with one (1) or more housing problems is associated with instability. As shown in the table above, there are 14,566 households earning less than 50% AMI with at least one housing problem. Additionally, households experiencing cost burden and crowding may be experiencing housing instability and be at a greater risk of homelessness. According to the 2011-2015 CHAS data, there are 1,299 low- and moderate-income households (<80% AMI) that experience crowding of more than 1 person per room. Additionally, there are 8,016 households in the 0-30% AMI income group that are experiencing cost burden greater than 30%, and 7,252 households in the 0-30% AMI group that are experiencing cost burden greater than 50%.

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

While there are many important priority needs listed in the County’s 5-Year Consolidated Plan, the HOME-ARP Allocation Plan considers only the priority needs listed below, which reflect the comments received during the consultation/needs assessment forums and public participation process. These priority needs align with goals previously identified in the Consolidated Plan:

1. Preservation/production of affordable housing (affordable rental housing, most notably permanent supportive housing)
2. Housing Assistance (rental/financial assistance)
3. Mental and behavioral health services (skilled/specialty case management)
4. Homeless shelters, facilities, and services (non-congregate emergency shelters for individuals and families)
5. Public services (wrap around supportive services)

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

The most recent Housing Inventory Counts (January 2021) and Point-In-Time counts (January 2021) were used to develop the data presented in the tables and narrative above. The 2011-2015 CHAS and 2021 American Community Survey 1-Year Estimates were used to supplement the housing inventory and point-in-time county. Based on reported numbers, there are currently insufficient shelter beds for those populations experiencing homelessness. It should also be assumed that the reported count for homeless populations is an undercount. There is likely a gap in affordable housing for low- and moderate-income populations earning less than 50% AMI. There are only 1,912 rental units considered affordable to extremely low-income populations earning less than 30% AMI and only 6,719 rental units affordable to populations earning less than 50% AMI (total of 8,631 units affordable to those earning >30% and >30-50% AMI). According to 2011-2015 CHAS data, this means there are 44,084 households earning >30% AMI or >30-50% AMI that are not able to access affordable housing, though it should be noted that some of these households may be able to access affordable owner housing. Additionally, over 14,500 renter households with an income less than 50% AMI live in a house with one or more housing problems. This represents over 27% of the total low-income population earning less than 50% AMI, suggesting there is a need for additional decent, affordable rental units.

Gaps related to coordination and supportive services were identified using previous performance of similar programs and previously identified community needs, as identified in the 2020-2024 5-Year Consolidated Plan. Additionally, through the consultation process the County identified gaps and needs based on outreach to housing and service providers.

## **HOME-ARP Activities**

### **Template:**

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

Pinellas County will solicit applications for proposed projects from local housing developers, public service providers, and nonprofit organizations. The solicitation will be advertised on the County's website via a request for proposals after publishing a Notice of Funding Availability. All proposed project applications will submit a description of the organization, description of the proposed project, and specify the requested funding amount. Pinellas County will evaluate all project proposals against the allocated budget and identified priority needs. Evaluations will be conducted by a technical review committee comprised of multiple persons. The applications will be reviewed for their compliance with the HOME-ARP program and benefits to qualifying populations prior to determining which projects to award.

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

Funding for eligible activities will be allocated directly to subrecipients with program compliance oversight and general administration/planning conducted by Pinellas County.

***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:***

Not applicable. No HOME-ARP administrative funds will be 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.

**Template:**

**Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$1,162,616.00		
Acquisition and Development of Non-Congregate Shelters	\$ 0.00		
Tenant Based Rental Assistance (TBRA)	\$ 0.00		
Development of Affordable Rental Housing	\$2,712,770.00		
Non-Profit Operating	\$ 0.00	0%	5%
Non-Profit Capacity Building	\$200,000.00	4.17%	5%
Administration and Planning	\$719,185.00	15%	15%
<b>Total HOME ARP Allocation</b>	<b>\$4,794,571.00</b>		

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

Pinellas County will allocate most of its HOME-ARP funding allocation to supportive services and development of affordable rental housing. Throughout the consultation process, several priority needs came to the County's attention, including the need for affordable rental units (notably permanent supportive housing), wrap-around supportive services, and non-congregate shelter for individuals and families. Although other specific needs were identified, most fell under the larger umbrella of supportive services (e.g., case management, short-term rental/financial assistance, etc.). Although non-congregate shelter was identified as a need, stakeholders were concerned about the ongoing operational expenses associated with such facilities not being an eligible activity under the HOME-ARP funding. A few needs identified were not eligible given the parameters of the HOME-ARP program.

Given the emphasis on supportive services heard at all the consultation/needs assessment forums and public hearing, and the dire need for affordable rental units (most notably permanent supportive housing) in Pinellas County, the County has decided to focus its HOME-ARP funding allocation on those two

eligible activities. The County will also reserve a small portion of the funds (<5%) for non-profit capacity building, specifically seeking to support providers who wish to expand their supportive service efforts to meet the needs of qualifying populations. The County is also reserving the maximum allowance for administration and planning efforts.

***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:***

As previously identified in the above sections, the qualitative and quantitative data presented indicates a need for projects that support the identified priority needs (affordable rental housing/permanent supportive housing and supportive services), and those that close the gaps in service delivery (increased capacity to support homeless populations and those at risk of becoming homeless).

## **HOME-ARP Production Housing Goals**

### **Template:**

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

Based on the funding available, Pinellas County anticipates being able to provide 15 to 20 affordable housing units for qualifying populations.

***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:***

The County's 2020-2024 5-Year Consolidated Plan identifies the priority need of preservation/production of affordable housing. Using the HOME-ARP funding allocation, the County estimates that 15-20 additional affordable housing units will be provided for qualifying populations. The proposed budget for development of affordable rental housing will fund projects that work towards addressing the County's high priority need for affordable rental housing, most notably permanent supportive housing.

## **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).

**Template:**

***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:***

Pinellas County does not intend to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

Subrecipients of HOME-ARP funds administered by Pinellas County, such as but not limited to CoCs, may have coordinated entry processes that establish priority based on need and according to established written standards. In such cases, Pinellas County will allow for need-based prioritization so long as such prioritization does not give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

Subrecipients will be required to demonstrate that the funded activity or project will be made available to all qualifying populations under the HOME-ARP program, consistent with civil rights and nondiscrimination laws and requirements, including fair housing and equal opportunity.

If a funded activity or project is later determined to necessitate preference for any reason, the HOME-ARP Plan will be substantially amended accordingly to reflect such limitation.

***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:***

Not applicable.

## **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).

**Template:**

***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):***

Since Pinellas County will not administer HOME-ARP projects directly (except for administration and planning), the County defers to the Continuum of Care's referral methods and coordinated entry procedures. The Homeless Leadership Alliance (HLA) is the Continuum of Care for the region, including Pinellas County. The HLA outlines their Coordinated Entry and referral procedures here: <https://static1.squarespace.com/static/5c784173a9ab953d5ee017d5/t/6231ef1c5e2a23775310a130/1647439647497/CE+Policies+and+Procedures+with+Attachments.pdf>

***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):***

Pinellas County will work with the HLA for coordinated entry procedures. Referrals for projects are made through the HLA. Some projects may include referral activities and will be completed by the corresponding HOME-ARP subrecipients.

***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):***

Since Pinellas County will not administer HOME-ARP projects directly (except for administration and planning), subrecipients are responsible for decisions related to referral method prioritization, where relevant.

***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):***

Since Pinellas County will not administer HOME-ARP project directly (except for administration and planning), subrecipients are responsible for decisions related to referral method prioritization, where relevant.

**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.

**Template:**

***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:***

Pinellas County does not intend to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population. Any individual who belongs to any of the qualifying populations under HOME-ARP is eligible to benefit from the selected projects.

***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:***

Pinellas County does not intend to implement a limitation to a particular qualifying population or specific subpopulation of a qualifying population. Any individual who belongs to any of the qualifying populations under HOME-ARP is eligible to benefit from the selected projects.

***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. Pinellas County does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

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

Not applicable. Pinellas County does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

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

Not applicable. Pinellas County does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

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

Not applicable. Pinellas County does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

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

Not applicable. Pinellas County does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

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

Not applicable. Pinellas County does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

## **ATTACHMENT A**

1. Application for Federal Assistance SF-424
2. Assurances - Non-Construction Programs (SF-424B)
3. Assurances - Construction Programs (SF-424D)
4. HOME-ARP Certifications

### Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- Preapplication
- Application
- Changed/Corrected Application

**\* 2. Type of Application:**

- New
- Continuation
- Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\* a. Legal Name:

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

\* c. Organizational DUNS:

**d. Address:**

\* Street1:

Street2:

\* City:

County/Parish:

\* State:

Province:

\* Country:

\* Zip / Postal Code:

**e. Organizational Unit:**

Department Name:

Division Name:

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

\* First Name:

Middle Name:

\* Last Name:

Suffix:

Title:

Organizational Affiliation:

\* Telephone Number:

Fax Number:

\* Email:

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

[Redacted]

Type of Applicant 2: Select Applicant Type:

[Redacted]

Type of Applicant 3: Select Applicant Type:

[Redacted]

\* Other (specify):

[Redacted]

**\* 10. Name of Federal Agency:**

[Redacted]

**11. Catalog of Federal Domestic Assistance Number:**

[Redacted]

CFDA Title:

[Redacted]

**\* 12. Funding Opportunity Number:**

[Redacted]

\* Title:

[Redacted]

**13. Competition Identification Number:**

[Redacted]

Title:

[Redacted]

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

[Redacted]

**\* 15. Descriptive Title of Applicant's Project:**

[Redacted]

Attach supporting documents as specified in agency instructions.

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	4,794,571.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on .
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:

## ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**



**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.



9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Chair, Board of County commissioners
APPLICANT ORGANIZATION Pinellas County	DATE SUBMITTED 

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

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**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant:, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Chair, Board of County Commissioners
APPLICANT ORGANIZATION Pinellas County	DATE SUBMITTED 

## HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.

\_\_\_\_\_  
Signature of Authorized Official

\_\_\_\_\_  
Date

Chair, Pinellas County Board of County Commissioners  
Title