

THE HFA INSTITUTE 2025

HOME-ARP Session 1

Implementing HOME-ARP Preferences through Referral Methods



National Council of State Housing Agencies



MRBs and Other Federal Homeownership Programs
JANUARY 15 – 17



Housing Credit
JANUARY 14 – 16



Section 8 and Other Federally Assisted Multifamily Housing
JANUARY 15 – 17



HOME and Housing Trust Fund
JANUARY 12 – 14



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Agenda

- Overview of Key Definitions
- Referral Methods in Action
 - HOME-ARP Expanded Coordinated Entry
 - Coordinated Entry & Other Referral Methods
 - Project/Activity Waiting List
- FAQs about Referral Methods

Overview

Review of Key Definitions for HOME-ARP

Three HOME-ARP Referral Methods

1

HOME-ARP Expanded Coordinated Entry (CE)

- CE expands to accept all HOME-ARP QPs
- CE adopts the HOME-ARP preferences and prioritization established by the PJ

2

CE and Other Referral Methods

- CE does not expand
- Supplement with referrals from other agencies or project-specific waiting lists to ensure access to all QPs

3

Project or Activity Waiting List

- Can be used with preferences and limitations
- Default referral method - applicants are selected in chronological order

Referral Methods:

- Must provide access to all four qualifying populations (QP)
- Must be imposed in the written agreement
- Must connect QPs to affirmatively marketed activities and projects
- Prioritize qualifying households according to PJs preferences and methods of prioritization
- May differ between activities or projects
- Collect documentation to demonstrate QP eligibility
- Must be used (and will be monitored) throughout the compliance period
- Can change if chosen method is not effectively connecting QPs with project/activity (must amend written agreement)
- Must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other fair housing and civil rights laws and requirements

Review of HOME-ARP QPs Populations

QP1

Homeless

- Homeless as defined in 24 CFR 91.5. *Homeless (1), (2), or (3)*

QP2

At Risk of Homelessness

- At risk of Homelessness as defined in 24 CFR 91.5

QP3

Fleeing DV/Sexual Assault/Trafficking

- Persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking

QP4

Other Populations

- Other populations who do not qualify under any of the populations above but meet one of the following criteria:
 - Other families requiring services or housing assistance to prevent homelessness
 - Those at greatest risk of housing instability

Review Preferences and Limitations

Preferences

- Allows one qualifying household to be referred before another
- Provides priority to a specific QP or subpopulation
 - Example of QP preference = QP1 Homeless
 - Example of a subpopulation within a QP = veterans experiencing homelessness

Method of prioritization (MOP)

- Determines the order of referral for households who qualify for a preference
 - Example of a MOP = Length of time homeless for QP 1 preference

Limitations

- Exclude certain QPs or subpopulations from eligibility for a project or activity

Affirmative Marketing

Affirmative marketing requirements at 24 CFR 92.351 apply to:

- All HOME-ARP Supportive Services and Tenant Based Rental Assistance programs
- Rental Housing and Non-Congregate Shelter projects with 5 or more HOME-ARP funded units
- Requirements include developing procedures that identify:
 - Method used to inform public about the PJ's affirmative marketing policy
 - Compliance requirements for subrecipients and owners
 - Practices to inform and solicit applications from all QPs
- Identify roles in written agreements to ensure appropriate parties' records document affirmative marketing efforts and outcomes

Affirmative Marketing cont.

- Different organizations and partners will have experience connecting with different QPs
- Use affirmative marketing requirements to guide conversations and decision making to ensure that all QPs have access
- During HOME-ARP program implementation:

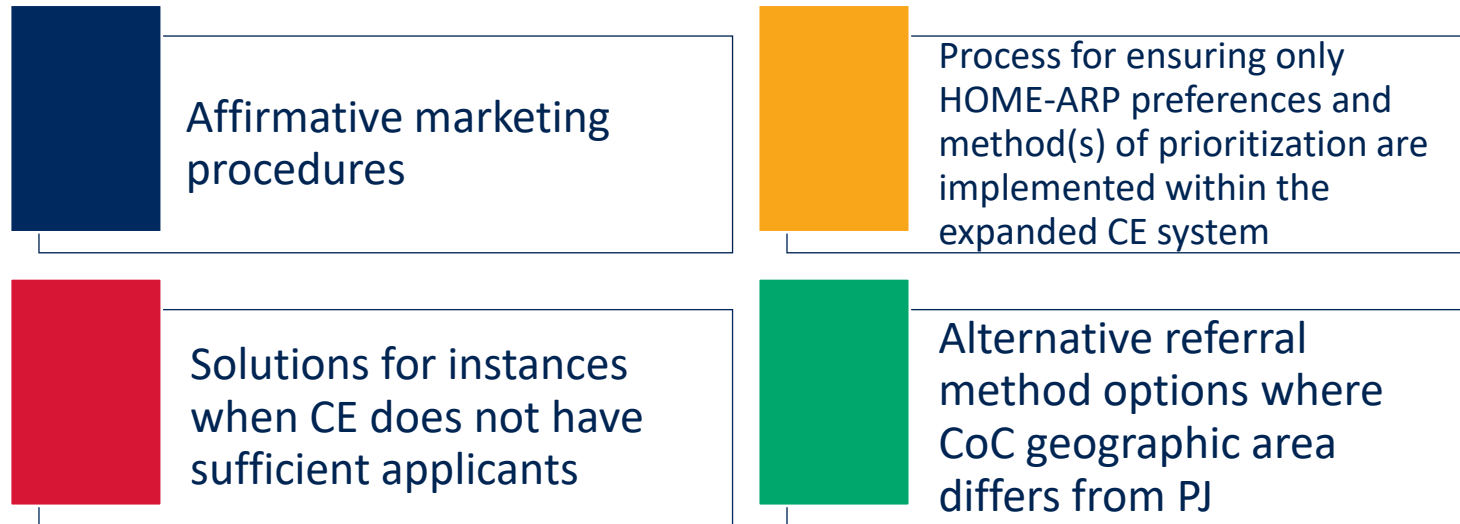


HOME-ARP Expanded Coordinated Entry



Actions to Expand CE

- PJ and CoC must work together to establish:

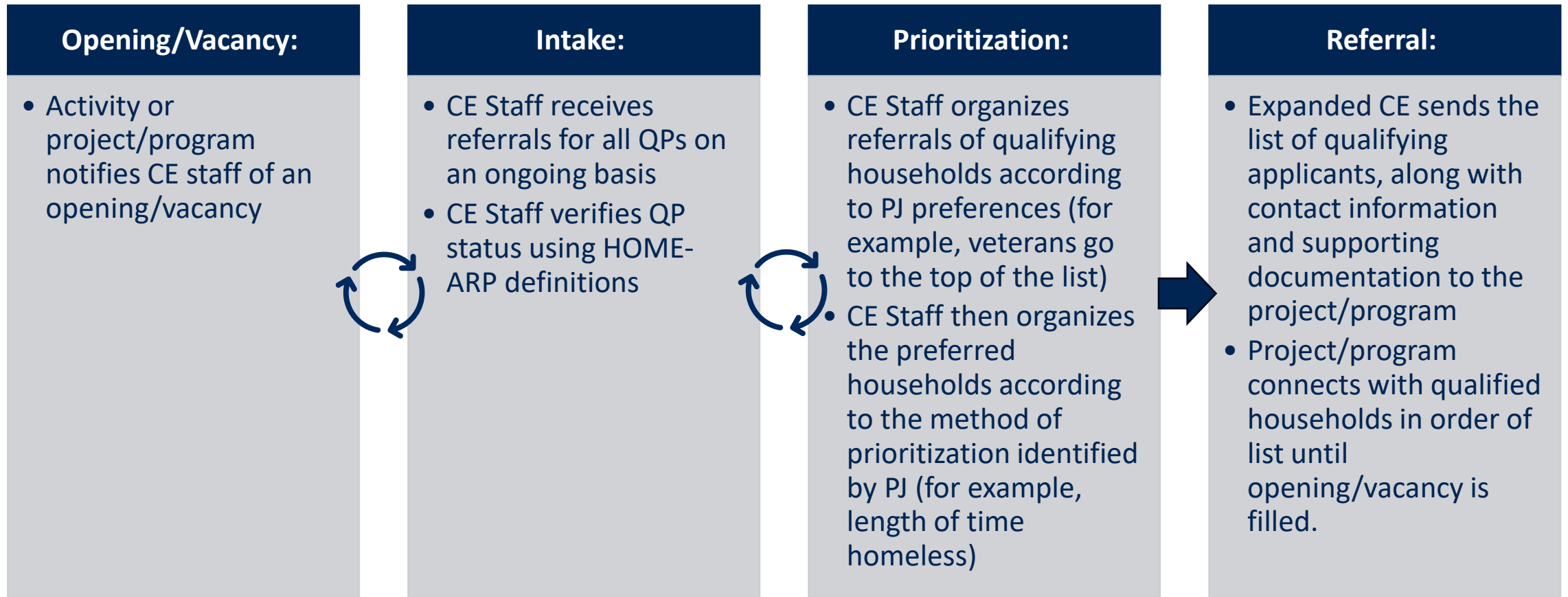


- Resolve financial and staffing needs necessary for CE system to expand
- Execute agreement between PJ and CoC/CE via written agreement or Memorandum of Understanding

Affirmative Marketing Tips

- PJs, CoC, owners, and subrecipients must work together to affirmatively market HOME-ARP projects/programs
- If a PJ will rely upon expanded CE, the CoC may conduct specific outreach to QPs who were previously ineligible for CE. **Note:** PJs are not required to use CE for affirmative marketing even when CE is the only referral method.
- During implementation:
 - Identify outreach methods that will be used for different QPs
 - Talk through process to ensure application is accessible to all
 - Ensure that project-level affirmative marketing is being implemented in accordance with PJ's procedures and the HOME-ARP written agreement

The Referral Process



Example of HOME-ARP Expanded CE

EXAMPLE: Community A

- **Activity:** Rental Housing
- **Referral Method:** HOME-ARP Expanded CE
- **Preference:** Seniors (62+) experiencing homelessness (QP1)
- **Method of Prioritization:** Chronological order (default)

HOME-ARP Referral Process

- Property manager notifies CE of vacancy
- CE organizes existing applications in their database, applying the Senior (62+) & QP1 preference, according to the date the application was received
- CE sends information for the household at the top of the list to the property manager. The property manager contacts applicant to offer the unit
- If there were no applications for QP1 62+, CE would send the next household from the list following the order in which the applications were received (chronological order)

Coordinated Entry & Other Referral Methods



Implementation Considerations: CE & Other Referral Methods

Determine in detail the other referral methods that will be used with CE, including self referrals

- Identify agencies that will provide referrals
- Ensure the identified referral sources provide access to all QPs collectively

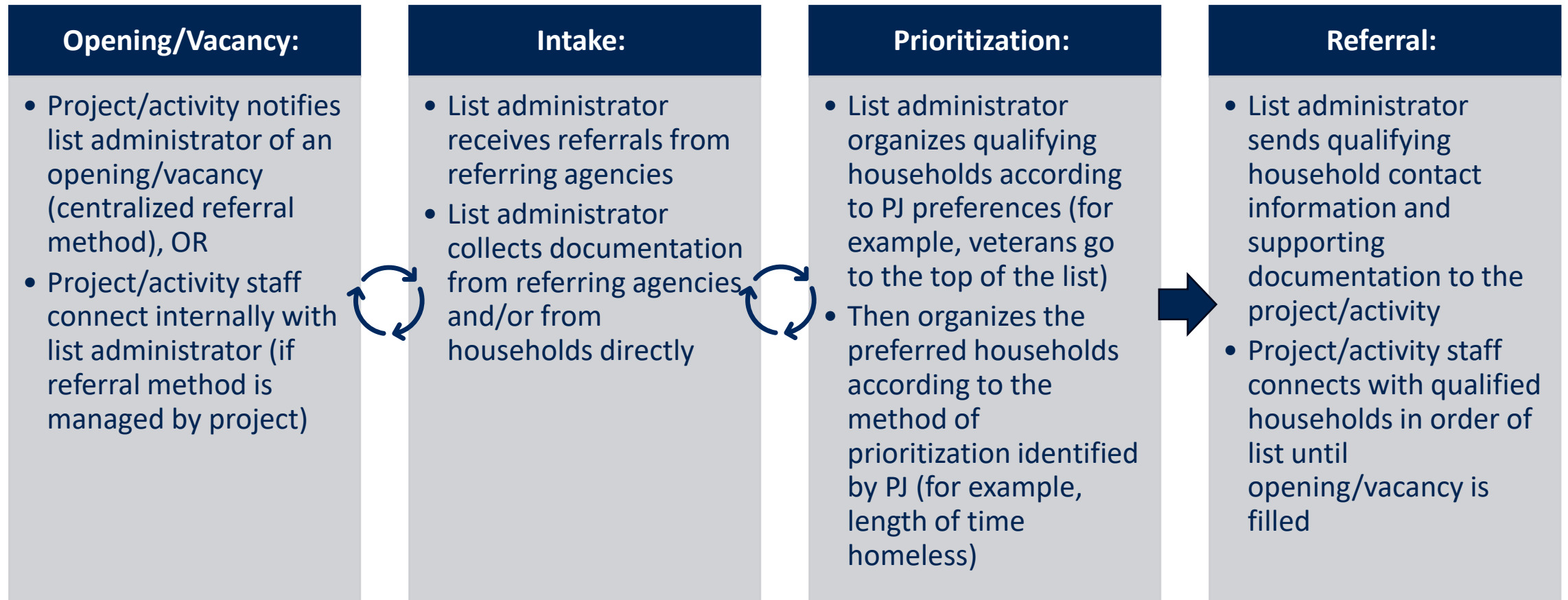
Identify how the referral methods will be coordinated

- Consider established preferences and methods of prioritization. If none are established, then chronological order must be used to select off the waitlist
- Who is responsible for collecting and organizing referrals as list administrator
- Ensure that list administrator does not give preference to one referral source over others.

Determine

- Who will collect QP documentation
- What actions will be taken to affirmatively market to all QPs

The Referral Process: CE & Other Referral Methods



Example: CE & Other Referral Methods

EXAMPLE: Community C

- **Activity:** Rental Housing
- **Referral Method:** CE & Other Referral Methods
- **Limitation:** QP1 homeless
- **Preference:** N/A
- **Method of Prioritization:** N/A

HOME-ARP Referral Process

- The owner acts as the list administrator and maintains the applications
- Project/activity receives referrals from CE and self-referrals from QP1 only due to limitation.
- CE provides initial eligibility documentation
- Applications are organized in chronological order of receipt
- No referral source receives priority over another. A CE referral is given the same consideration as a self-referral
- Owner conducts final determination of QP eligibility

Example: CE & Other Referral Methods

EXAMPLE: Community B

- **Activity:** Tenant Based Rental Assistance
- **Referral Method:** CE & Other Referral Methods
- **Preference:** QP1
- **Method of Prioritization:** Longest history of homelessness

HOME-ARP Referral Process

- 211 acts as the list administrator for a centralized list for all QPs and sends referrals when notified by project/activity
- List administrator receives referrals from CE in order of length of time homeless, including documentation
- All other QPs have access through the 211 hotline, provide initial eligibility documentation to 211
- List administrator organizes all applications with QP1 referrals on top in order of longest history of homelessness, all other QPs are in chronological order of receipt
- If there are no QP1 households, the list administrator refers applicants from other QPs in chronological order
- Project/activity conducts final determination of eligibility, updating documentation when needed

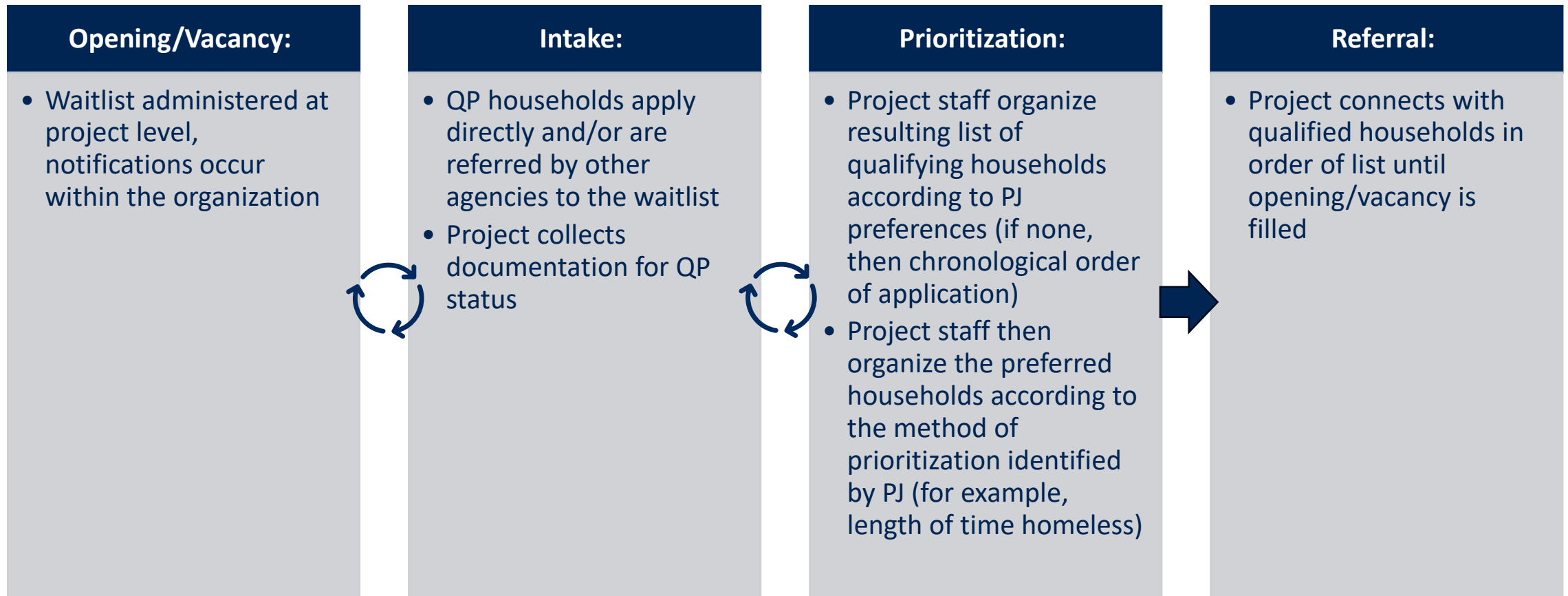
Project/Activity Waiting List

3

Implementation Considerations: Project Waiting List

- Determine:
 - Who will administer the waitlist and if the same list is maintained for one or more projects/activities
 - When/how affirmative marketing for the project will begin and when will the list begin accepting applications
- Establish parameters and procedures for maintaining the waitlist
 - Method and tools used to organize applications (Excel, software, etc.)
 - How often will client contact information be updated, etc.
- If applicable, identify process for implementing preferences and methods of prioritization established in the Allocation Plan. If no preferences, then applicants are placed on the list in chronological order of application.

The Referral Process: Project Waiting List



Example: Activity Waiting List

EXAMPLE: Community D

- **Activity:** Supportive Services (SS) for Short- Term Rental (STR) assistance
- **Referral Method:** Activity Specific Waiting List
- **Limitation:** N/A
- **Preference:** Veterans across all 4 QPs
- **Method of Prioritization:** Default chronological order of application

HOME-ARP Referral Process

- Activity Specific Waiting List is administered by lead administrator; this activity is using several subrecipients, serving all 4 QPs, with the PJ administering the wait list
- Lead administrator is responsible for collecting initial eligibility documentation, inputting names, and organizing the list, as follows;
 - Veterans across all 4 QPs are moved to the top of the list, in order of application
 - The remaining applications are listed chronologically
- Subrecipient notifies lead administrator that they have room in caseload for additional participants, List administrator sends referral
- Subrecipient confirms eligibility, updating documentation if needed



Summary



HOME-ARP Referral Method(s) **MUST** be used throughout the:

- Rental Housing compliance period
- Non-Congregate Shelter restricted use period (even if units are converted to affordable housing)
- TBRA and SS program written agreement period



Policies and procedures should ensure:

- Access is provided to all 4 QPs (and marketed appropriately)
- Referrals are made in accordance with preferences, methods of prioritization, and limitations established in the PJ's plan
- Roles and responsibilities are clearly defined, as is the process for making referrals

Frequently Asked Questions

Question #1

Would accepting referrals from households without children (Adults Only) be, okay? If so, does it create a limitation?

- **No, an adult-only project would not be permissible under HOME-ARP. Additionally, a PJ may not provide HOME-ARP funds to a project that has a preference for adult-only households.**
- While HOME-ARP does permit limitations in some cases, a limitation to serve adults only or restrict occupancy based on familial status would violate Fair Housing laws.
- **PJs can limit occupancy based on local code.** Limited occupancy refers to the number of individuals that can reside in a particular unit. Typically, occupancy limits are set based on number of bedrooms in the property.

Question #2

If the PJ has a preference listed in the accepted Allocation Plan, does that preference need to apply to every activity and project the PJs funds?

- **No, the preferences does not need to apply to every activity or project.** The implementation of preferences must be consistent with the accepted allocation plan; preferences that are established in the allocation plan as project/activity specific do not need to apply to every project/activity. Expanding or restricting the preferences established in the allocation plan requires a substantial amendment.

Question #3

Is it permissible for an organization to limit referrals and provide Supportive Services exclusively to their current tenants at various scattered sites

- No, HOME-ARP Supportive Services cannot be limited to a service providers' current tenants in scattered sites. PJs are not permitted to limit their Supportive Services programs to a particular rental unit or project.
- A PJ may decide to fund HOME-ARP Supportive services in conjunction with HOME-ARP funded rental housing project, where such supportive services are necessary to assist the QP to obtain and maintain housing and are not duplicated by another source.

Question #4

A PJ is using HOME-ARP Expanded CE, who is responsible for affirmative marketing?

- All PJs must develop affirmative marketing policies and procedures for its HOME-ARP program, regardless of the referral methods(s) used for individual projects and activities.
- Additionally, project/activity-level affirmative marketing plans must be developed by the owner/developer/subrecipient in alignment with the PJs policies & procedures, and must reflect any preferences/limitations.
- PJs may write into their policies and procedures that multiple affirmative marketing actions may be implemented, beyond CE, if the PJ believes that would be beneficial.
- PJs are responsible for ensuring that affirmative marketing requirements are enforceable through the HOME-ARP written agreement and must monitor the project-level affirmative marketing actions.

Referral Method Resources

- [HOME-ARP Policy Brief Preferences, Methods of Prioritization and Limitations](#)
- [Understanding HOME-ARP Preferences, Referral Methods, and Allocation Plan Requirements Presentation](#)
- [Introduction to HOME-ARP Referral Methods and Coordinated Entry](#)
- [Using HOME-ARP Referral Methods](#)
- [Referral Methods for HOME-ARP NCS](#)