

# Substantial Amendment to the 2021 Annual Action Plan HOME ARP Allocation Plan

Community Development Block Grant  
HOME Investment Partnerships Program



## Terrebonne Parish Consolidated Government

Department of Housing and Human Services  
Community Development Division



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## **Participating Jurisdiction: Terrebonne Parish Consolidated Government**

**Date: 8/1/2022**

### **Consultation**

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction's geographic area, homeless and 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, at a minimum. 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.

#### ***Summarize the consultation process:***

The Terrebonne Parish Consolidated Government's Department of Housing and Human Services (TPCG) consulted with its homeless provider partner agencies of the Louisiana Balance of State CoC (LABOSCOC), the Houma Region CoC homeless service agencies, the local domestic violence provider; The Haven, the veterans' service agency; Start Corporation, Terrebonne Parish Section 8 (PHA), the Houma-Terrebonne Housing Authority (Public Housing), the Houma Chapter of the NAACP and other homeless and behavioral health providers. Consultation was conducted via meetings, e-mails and surveys. The TPCG Housing and Human Services Department is the public agency that addresses the needs of the HOME ARP qualifying populations. Programs available include Beautiful Beginnings Homeless Shelter, Rapid Re-Housing, Tenant Based Rental Assistance, and the Crisis Intervention Program.

The LABOSCOC conducts a monthly zoom meeting with member agencies from not only Terrebonne Parish but also from the surrounding jurisdictions. During the August 8, 2022, monthly meeting, LABOSCOC allowed an open mic for agencies like TPCG to discuss assorted topics to include but not limited to programs like HOME ARP. TPCG informed the stakeholders that it would be receiving \$1.2 million dollars in HOME ARP funding to assist persons experiencing homelessness and other qualified population and requested feedback. Additional CoC consultation was done during the Houma Region quarterly zoom meeting on August 15, 2022. TPCG discussed the HOME ARP plan and received feedback on the local need from stakeholders within the Participating Jurisdiction.

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

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>LABOSCO</b>	CoC collaborative applicant and member agencies	Zoom	The overall feedback received showed a strong need for affordable rental housing, non-congregate shelter and supportive services in the form of identification assistance and security deposit.
<b>Local CoC</b>	CoC-subgroup Houma Region	Zoom	There is a need for many distinct aspects of homelessness services including non-congregate shelter, rental assistance and new construction of affordable housing.
<b>Start Corp.</b>	Non Profit-all homeless populations, behavioral health and federally qualified health center	Zoom, meeting, and survey	The production or preservation of affordable rental units for all categories of the qualifying population is an unmet need.
<b>Start Corp.</b>	Non Profit-veteran and disability populations	Zoom, meeting, and survey	This division of the nonprofit gave feedback on a strong need for the production or preservation of affordable housing and supportive services in the form of security deposits.
<b>Options for Independence</b>	Non Profit-homeless populations, disability populations and	Zoom, meeting, and survey	The nonprofit requested the funds are used for the production or preservation of affordable housing. There was an overwhelming need

	low income housing		prior to Hurricane Ida. Now the need is even greater.
<b>The Haven</b>	Non Profit-domestic violence population	Survey and email	The nonprofit requested funds are used in the production or preservation of affordable rental units for all categories of the qualifying population.
<b>Houma Housing Authority</b>	Public Housing	Survey and meeting	The production or preservation of affordable rental units for all categories of the qualifying population is greatly needed. Both public housing developments have been unoccupied for over 12 months due to being severely damaged by Hurricane Ida.
<b>The NAACP</b>	Civil Rights/Fair Housing Community Organization	Survey and email	Feedback.
<b>TPCG-Section 8</b>	PHA	Survey and meeting	The agency requested that funds be used for the production or preservation of affordable rental units for all categories of the qualifying population. Also, a need for supportive services in the form of security deposit. There are over 400 voucher holders searching for housing in Terrebonne Parish. Due to Hurricane Ida, decent, safe and sanitary housing is limited.
<b>South Central Louisiana Human Resources Authority</b>	Behavioral/Mental Health Services	Survey and meeting	SCLHSA requested funds are used in production or preservation of affordable rental units for all categories of the qualifying population. Permanent affordable housing is difficult to find in

			Terrebonne Parish and the surrounding areas.
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## Public Participation

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

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

- The amount of HOME-ARP the PJ will receive. The PJ will receive \$1,235,848.00.
- The range of activities the PJ may undertake. The PJ may undertake activities in the production or preservation of affordable housing, tenant-based rental assistance (TBRA), supportive services, homeless prevention services, housing counseling, and the purchase and development of non-congregate shelters (NCS).

***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:***

- ***Public comment period:*** start date – 9/19/2022 end date – 10/20/2022
- ***Public hearing:*** 10/12/2022

TPCG published a notice in the local newspaper on October 03, 2022 stating that its 2021 Annual Action Plan is being amended to include HOME ARP funding. The notice provided an opportunity for citizens to review and comment on the amendment via USPS mail, e-mail or survey. TPCG conducted an Annual Action Plan amendment public hearing, as published in the notice, at its Housing and Human Services office on **Wednesday, November 02, 2022**. The draft plan was made available for viewing on the TPCG Housing and Human Services’ Community Development webpage for 30 days.

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

To encourage public participation, TPCG made a survey available in its lobby throughout the public comment period.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

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

To be included after the comment period.

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

To be included after the comment period.

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

The HOME ARP allocation must be used to primarily benefit individuals and families that fall within a specific qualifying population (QP). Terrebonne Parish has individuals and families that meet the definition of all qualifying populations. The next few pages will give the reader each definition of the QP and the estimated number of members in each that have unmet needs. After meeting this requirement, any individuals or families qualified to receive any assistance need not meet additional criteria. To meet the criteria of a qualifying population, individuals and families must fall within the following:

**Homeless.**

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

#### **At risk of homelessness.**

(1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "Homeless" definition in this section; and

(iii) Meets one of the following conditions:

- (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- (B) Is living in the home of another because of economic hardship;
- (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
- (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
- (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

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

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

Certification. A written assertion, based on supporting evidence, that must be kept available for inspection by HUD, by the Inspector General of HUD, and by the public. The assertion shall be deemed to be accurate unless HUD determines otherwise, after inspecting the evidence and providing due notice and opportunity for comment.

***Fleeing/Attempting to Flee the below or Human Trafficking.***

Dating violence means violence committed by a person:

- (1) Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- (2) Where the existence of such a relationship shall be determined based on a consideration of the following factors:
  - (i) The length of the relationship;

(ii) The type of relationship; and

(iii) The frequency of interaction between the persons involved in the relationship.

Domestic violence includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction. The term “spouse or intimate partner of the victim” includes a person who is or has been in a social relationship of a romantic or intimate nature with the victim, as determined by the length of the relationship, the type of the relationship, and the frequency of interaction between the persons involved in the relationship.

Sexual assault means any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.

Stalking means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

(1) Fear for the person's individual safety or the safety of others; or

(2) Suffer substantial emotional distress.

VAWA means the Violence Against Women Act of 1994, as amended (42 U.S.C. 13925 and 42 U.S.C. 14043e et seq.).

### ***Human Trafficking.***

Human trafficking, also known as trafficking in persons (TIP), is a modern-day form of slavery. It is a crime under federal and international law; it is also a crime in every state in the United States

#### Federal Anti-Trafficking Laws

The Trafficking Victims Protection Act (TVPA) of 2000 is the first comprehensive federal law to address trafficking in persons. The law provides a three-pronged approach that includes prevention, protection, and prosecution. The TVPA was reauthorized through the Trafficking Victims Protection Reauthorization Act (TVPRA) of 2003, 2005, 2008, 2013, and 2017.

Under U.S. federal law, “severe forms of trafficking in persons” includes both sex trafficking and labor trafficking:

**Sex trafficking** is the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purposes of a commercial sex act, in which the commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such an act has not attained 18 years of age (*22 USC § 7102*).

**Labor trafficking** is the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purposes of subjection to involuntary servitude, peonage, debt bondage, or slavery, (*22 USC § 7102*).

### *Other Population.*

Where providing supportive services or assistance under section 212(a) of NAHA (42 U.S.C. 12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability. HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

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

(2) At Greatest Risk of Housing Instability is defined as household who meets either paragraph (i) or (ii) below: (i) has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs); 8 (ii) has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the following conditions from paragraph (iii) of the "At risk of homelessness" definition established at 24 CFR 91.5: (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance; (B) Is living in the home of another because of economic hardship; (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals; (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau; (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan Veterans and Families that include a Veteran Family Member that meet the criteria for one of the qualifying populations described above are eligible to receive HOME-ARP assistance.

Terrebonne Parish's qualifying populations include persons experiencing homelessness, households at risk of homelessness, persons fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other populations. Other populations include very low-income households at or below 30% AMI (at-risk of homelessness), households requiring services or housing assistance to prevent homelessness, households with

income between 30-50% AMI experiencing one or more severe housing problems, and veterans and families that include a veteran family member that meets one of the other criteria described.

TPCG's Community Development Division evaluated the size and demographic composition of the qualifying populations within its boundaries and assessed the unmet needs of these populations. This analysis was done by reviewing the Homeless Needs Inventory and Gap Analysis data that was gathered from the Continuum of Care (LABOSCOC) Capital Area Alliance for the Homeless (CAAH) and Point in Time Count (PIT) for the 2022 Houma/Terrebonne region homeless persons count.

***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:***

### **Needs Assessment and Gaps Analysis**

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. 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. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

**Exhibit 1**

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

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	3075	1018	418	418	4								
Transitional Housing	0	0	21	21	21								
Permanent Supportive Housing	120	42	120	40	3								
Other Permanent Housing	0	0	10	10	0								
Sheltered Homeless						3051	393	5	8				
Unsheltered Homeless						142	15	0	0				
<b>Current Gap</b>										0	0	7	7

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

**Exhibit 2****OPTIONAL Housing Needs Inventory and Gap Analysis Table**

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	# of Units	# of Households	# of Households
Total Rental Units	4138		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1034		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1035		
0%-30% AMI Renter HH w/ 1 or more severe housing problems  (At-Risk of Homelessness)		1545	
30%-50% AMI Renter HH w/ 1 or more severe housing problems  (Other Populations)		1640	
<b>Current Gaps</b>			(1116)

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

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

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

**And**

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

The unmet housing and services need of the qualifying population is assistance with security deposit upon lease up.

The gap within the current shelter and housing inventory is an emergency shelter for both single woman and families with at least one child. Within the PJ's jurisdiction, there is only one emergency shelter for families with children that is not DV, and that is the Beautiful Beginnings Center. However, this center is closed pending repair of damages caused by Hurricane Ida

Furthermore, there is not an emergency shelter available for the single female population.

***Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of "other populations" as established in the HOME-ARP Notice:***

Under the HOME ARP definition of qualifying population, the definition of the "other population" shows the greatest need for assistance.

Referring to exhibit 1 from the most recent point-in-time (PIT) count, the data includes 3,414 people who are currently housed in temporary, emergency housing units provided by FEMA or the State of Louisiana.

Since the PIT count, the number of residents needing assistance has increased. The current unmet need is 4,032 people.

Exhibit 2 from above which includes data from the latest American Community Survey (ACS) and Comprehensive Housing Affordability Strategy (CHAS), documents a shortage of affordable housing stock prior to Hurricane Ida. Since the category 4 hurricane caused substantial damage to

over half the jurisdiction's homes, both rental and owner, this lack of affordable housing issue has been augmented. Currently, there are still 781 destroyed homes according to FEMA. This includes 448 under homeownership; and 203 under renter.

To demonstrate the lack of affordable housing inventory, eighty-five percent of the vouchers issued in the PJ's jurisdiction since the hurricane have gone unused. Extensions have been given now for over 240 days.

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

The greatest need in the jurisdiction is the production of affordable rental housing.

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

The level of need and gaps analysis conclusion is based on the review of all aspects of housing within the parish. The PJ consulted with housing providers, CoC members, nonprofits, various departments, interested agencies and organizations, property owners, tenants, and residents. The consensus is that the parish's level of devastation from Hurricane Ida has significantly reduced the number of available affordable rental housing units. The availability of affordable hotels, apartments, duplexes, mobile homes, multifamily or single-family homes are near zero.

## **HOME-ARP Activities**

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

TBD through the NOFO process.

***If any portion of the PJ's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:***

Not applicable.

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.

The following table may be used to meet this requirement

### **Use of HOME-ARP Funding**

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 0.00		
Acquisition and Development of Non-Congregate Shelters	\$ 0.00		
Tenant Based Rental Assistance (TBRA)	\$ 0.00		
Development of Affordable Rental Housing	\$ 1,050,470.80		
Non-Profit Operating	\$ 0.00	0 %	5%
Non-Profit Capacity Building	\$ 0.00	0 %	5%
Administration and Planning	\$ 185,377.20	15 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,235,848.00</b>		

***Additional narrative, if applicable:***

TPCG intends to combine HOME ARP with HOME Entitlement, General Fund ARP funding and developer financing to create at least forty five duplexes (ninety units) of affordable rental housing. Depending on the cost of construction, the plan is to fund at least three duplexes (six units) with HOME ARP funds.

***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:***

Many local factors are contributing to TPCG’s plan to develop affordable housing. One factor is Hurricane Ida and the destruction it has caused to Terrebonne Parish. Many homes have been determined to be substantially damaged, for which the total cost of repairs is 50% or more of the structure’s value prior to Hurricane Ida. One year post-storm, there are still over 6,000 people in FEMA or State trailers searching for permanent housing. Hurricane Ida has greatly impacted the absence of affordable housing in Terrebonne Parish. Another factor is the cost burden to families and individual in rental units. After consultation with different agencies and organization within the parish, rents have increased by 25-35% post-storm. The lack of inventory in the housing market has had an adverse effect on affordable housing. Lastly, the most proven aspect that Terrebonne Parish is lacking affordable housing is shown from the Section 8 program. The Section 8 program received 225 vouchers to assistance low-income residence lease up units in October 2021. Of those 225 vouchers, only 30 participants have found affordable housing in the parish.

## HOME-ARP Production Housing Goals

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

The estimated number of affordable rental housing units the PJ will produce with its HOME-ARP allocation is four to six.

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

The PJ's goal is to develop four to six HOME ARP affordable rental units within a project that will produce approximately 90 affordable rental housing units overall.

The HOME-ARP-funded units will remain affordable for a minimum of 15 years and not less than 70% will be leased to the qualifying population at initial occupancy. In addition, not more than 30% of the HOME-ARP-funded units will be occupied by low-income households.

To complete this goal, TPCG will publish a NOFO to request developers to submit a plan that will leverage its HOME-ARP allocation with additional funding sources such as the four percent tax credit, developer funds, and other local funds.

## Preferences

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

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

The PJ will provide a preference for the elderly population throughout all the qualifying populations and subpopulations.

***If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

According to USAFacts, <https://usafacts.org/data/topics/people-society/population-and-demographics/our-changing-population/state/louisiana/county/terrebonne-parish>, the highest percentage of age makeup in Terrebonne Parish as of 2021 is 65 and over at 20.9%. This is an increase of 4% since 2010. The next highest is 50 to 64. With over 40% of the population between the ages of 50 and 65+, it is critical to begin addressing the unmet needs of the ever-

aging population in Terrebonne Parish. Many of the population within this age group according to the latest census tract, <https://www.census.gov/data/tables/time-series/demo/income-poverty/historical-income-households.html>, are at the lowest median income. This population made up most of the residents at the largest concentrated public housing complex, Bayou Towers, that was destroyed by Hurricane Ida. The complex had 300 units destroyed and displaced over 265 people; many which remain unhoused in permanent affordable housing.

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

The PJ will offer an elderly preference to all qualifying populations. When the waiting list is open to receive applications, the PJ will accept all applications from the qualifying populations. When selecting the applicant for assistance, the PJ will pull from the waiting list based on date and time with the applicant meeting the preference being selected first. After the applicants that meet the preference are selected, the PJ will select the next applicant on the list without the preference for assistance.

## **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 as Terrebonne Parish Consolidated Government does not intend to use HOME-ARP funds for rehabilitation or refinancing.

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

Not applicable as Terrebonne Parish Consolidated Government does not intend to use HOME-ARP funds for refinancing.

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***  
Not applicable as Terrebonne Parish Consolidated Government does not intend to use HOME-ARP funds for refinancing.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***  
Not applicable as Terrebonne Parish Consolidated Government does not intend to use HOME-ARP funds for refinancing.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***  
HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.
- ***Other requirements in the PJ's guidelines, if applicable:***  
Not applicable.