

HOME-ARP Allocation Plan Template

Guidance

- To receive its HOME-ARP allocation, a PJ must:
 - Engage in consultation with at least the required organizations;
 - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further Fair Housing;
 - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - Anti-Lobbying;
 - Authority of Jurisdiction;
 - Section 3; and,
 - HOME-ARP specific certification.

Participating Jurisdiction: New Mexico Mortgage Finance Authority

Date: 2/16/2022

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:

During the fall of 2021, MFA held seven, one-hour, virtual consultation sessions with the New Mexico Continuum of Care, homeless service providers, victim service providers, veterans’ groups, public housing authorities, tribal housing partners, public agencies that address the needs

of the qualifying population, and organizations that address civil rights, fair housing, and people with disabilities, tribal housing partners and housing developers. In total MFA invited 123 entities to participate in HOME-ARP consultations, twenty-three entities attended the consultations, and twenty entities provided input during the consultations. The entities that provided feedback collectively provide services across the entire state. Entities that were unable to attend a scheduled consultation were invited to send written comments to MFA. (See appendix 1 for complete list of entities invited to participate in the HOME-ARP consultation process.) During these consultations, MFA provided an overview of the HOME-ARP program, including the definitions of the qualifying population and eligible activities. MFA also sought information on the size and demographics of the qualifying population, unmet shelter, housing, and service needs of the qualifying population, and gaps within the current shelter and housing inventory and service delivery system. Further, MFA used the consultations as an opportunity to discuss practicalities of implementing HOME-ARP activities, including possible partnerships, client outreach strategies, and subsidy layering options.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Project Moxie	Other public or private agency that addresses the needs of the qualifying population	Virtual Discussion	<ul style="list-style-type: none"> • Provide as much flexibility as possible with funding and project. • Project-based vouchers are essential to making rental housing financially feasible for the qualifying population. • Motel conversions are only feasible with vouchers and other resources. • Look to use HOME-ARP for rental housing projects with financing gaps. • There are rental housing gaps in rural parts of the state and for youth aging out of foster care. • Homelessness prevention will be critical as eviction moratoriums expire.
Greater Albuquerque Housing Partnership	Other public or private agency that addresses the needs of the qualifying population	Virtual Discussion	<ul style="list-style-type: none"> • Sustaining operations through affordable housing restricted use periods is a concern when HOME-ARP funds are only available for 10 years.

			<ul style="list-style-type: none"> • Using HOME-ARP funding as a capitalized operating reserve could support operations and services. • Hotel conversions can be challenging and costly.
Mesilla Valley Community of Hope	Homeless services provider/Veteran's group/Private organization that address the needs of persons with disabilities	Virtual Discussion	<ul style="list-style-type: none"> • There is a need for more rental units for the qualifying population. The dearth of rental units has created a challenge for even housing voucher holders to secure a home. • There is a need to bolster supportive services based at affordable housing development. • Increasingly there is a need to assist families experiencing homelessness. • While addressing the need for permanent rental housing should be the priority, there is also need for transitional housing including safe, outdoor camps. • There needs to be services tied to LIHTC projects. • Homelessness prevention, like rapid rehousing, will reduce the need for more costly, long term interventions.
BeauxSimone Consulting	Other public or private agency that addresses the needs of the qualifying population	Virtual Discussion	<ul style="list-style-type: none"> • HOME-ARP could be used to address the financing gaps in New Mexico's permanent supportive housing pipeline. • MFA should adopt the broadest, most inclusive qualifying population definition so that communities have the flexibility to respond to their housing needs. • HOME-ARP for rental housing development would be best offered as a grant. • MFA should open an RFP or NOFA and let communities tell MFA how to best use the funding for rental housing development. • Projects should involve staff with credentials to bill Medicaid.

			<ul style="list-style-type: none"> • Behavioral health service providers or community mental health providers can offer supportive services to meet the diverse needs of the qualifying population.
Mesilla Valley Public Housing Authority	Public Housing Authority	Virtual Discussion	<ul style="list-style-type: none"> • Mesilla Valley Public Housing Authority just completed 40 units of supportive housing that have 36 project vouchers. HOME-ARP funding could be used to sustain supportive services.
Alianza of New Mexico	Homeless services provider	Virtual Discussion	<ul style="list-style-type: none"> • There is a lack of service providers and affordable housing inventory in the southwestern and southeastern part of the state. • The southern part of the state has a need for supportive services, short term shelter, and permanent housing. • As CARES Act funding expires, service providers will need new funding to maintain the existing services being provided. • Without reliable resources the issue of coverage gaps will worsen.
Chicanos Por La Causa/HELP NM	Homeless services provider	Virtual Discussion	<ul style="list-style-type: none"> • Transitional housing is a missing piece on the housing spectrum. • A rental unit shortage makes it difficult for people to use housing vouchers. • More housing for youth is critical. • Rents now exceed HUD fair market rates and encouraging landlords to participate in programs is a challenge in Northern New Mexico.
HEART of Taos	Homeless Services Provider	Virtual Discussion	<ul style="list-style-type: none"> • In Taos there are few emergency shelters, and the only affordable properties are a few LIHTC developments that don't offer any support services

If additional space is needed, insert image of table here:

Agency/Org Feed Back Continued

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Albuquerque Health Care for the Homeless	Homeless Services Provider	Virtual Discussion	<ul style="list-style-type: none"> • People of color, especially Native Americans, are overrepresented in New Mexico’s homeless population. • Seniors (age 55+) are an increasing share of the homeless population. • New housing development is a huge need, and housing development should be “low barrier.” • HOME-ARP is an opportunity to target funding to households at the 30% AMI or below level. • Priorities should be new permanent supportive housing and include project-based and tenant-based subsidies. • The 30% AMI and below households are at the greatest risk of homelessness.
Families & Youth, Inc.	Other public or private agency that addresses the need of the qualifying population	Virtual Discussion	<ul style="list-style-type: none"> • In Las Cruces there is a lack of affordable family units. • There are waiting lists for transitional living units for youth.
A New Day Youth and Families Services	Other public or private agency that addresses the need of the qualifying population	Virtual Discussion	<ul style="list-style-type: none"> • There needs to be diverse housing options for youth that meet their developmental needs, which could include small group housing units or transitional housing arrangements.
Saint Elizabeth Shelter	Homeless Services Provider	Virtual Discussion	<ul style="list-style-type: none"> • There is a need for support services to help people maintain housing; such a program would be new in New Mexico.
HopeWorks	Other public or private agency that addresses the need of the qualifying population/ Homeless Services Provider	Virtual Discussion	<ul style="list-style-type: none"> • Permanent supportive housing should be a priority.
San Felipe Housing Authority	Tribal Housing Authority	Virtual Discussion	<ul style="list-style-type: none"> • Homelessness in San Felipe Pueblo often manifests as overcrowding. There are even households pitching tents in the backyards of their families. COVID-19 highlights the need to

			<p>address homelessness in the form of overcrowding.</p> <ul style="list-style-type: none"> • Overcrowding has led to a rapid spread of diseases and also lead to an increase in domestic violence cases. • There are also many tribal members with mental illness, on and off the reservation, struggling to secure and maintain housing. • San Felipe Pueblo needs more rental units and a small domestic violence shelter.
Pueblo of Acoma Housing Authority	Tribal Housing Authority	Virtual Discussion	<ul style="list-style-type: none"> • The Pueblo of Acoma has serious overcrowding issues. The Pueblo has rental assistance through the CARES Act but is still in need for more units, including single-family and multi-family for homeownership and rental.
Albuquerque Housing Authority	Public Housing Authority	Virtual Discussion	<ul style="list-style-type: none"> • Renovation of public housing is key. It is best not to concentrate development to only serve the lowest income levels or only persons at risk of homelessness. • Mixed income housing is best practice. • The housing authority needs supportive services for voucher holders to help them find and retain housing. • The housing authority would possibly be interested in HOME tenant based rental assistance.
Santa Fe Civic Housing	Public Housing Authority	Virtual Discussion	<ul style="list-style-type: none"> • Santa Fe Civic Housing Authority would consider developing permanent supportive housing with HOME-ARP funds. • The main issue for the Santa Fe homeless population is single individuals with mental health conditions. They need to be connected with existing services for supportive services.
New Mexico Coalition to End Homelessness	New Mexico Continuum of Care/ Homeless and domestic violence service provider/Veteran's group	Virtual Discussion	<ul style="list-style-type: none"> • There is a huge need for permanent supportive housing and additional rental units. • It is increasingly difficult to find landlord participation in voucher programs. • There is a lack of case management and housing

			<p>navigators to facilitate services already available.</p> <ul style="list-style-type: none"> • Gallup is heavy on homelessness, and there is a Howard Johnson hotel that is available for a possible rehabilitation project in future. • There is no need for tenant based rental assistance with the amounts of COVID-19 rental assistance available. • As the COVID-19 eviction moratoriums expire, there will be a need to fund eviction prevention. • Capital projects that result in new housing units are needed. • The best use of funding is to mix capital and supportive services in a single project. • Medicaid does not cover every service vulnerable populations need, but there is a need to link permanent supportive housing with service providers who know how to bill to Medicaid. • Using HOME-ARP as capital may be appropriate as it is one time funding.
YES Housing	Other public or private agency that addresses the need of the qualifying population/ Homeless Services Provider	Virtual Discussion	<ul style="list-style-type: none"> • Operating and services funding remains the key issue for rental housing development to support the qualifying population. Even if you move these individuals into housing, you need services to help them maintain stability.
New Mexico Center for Law and Poverty	Organizations that address civil rights, fair housing, and people with disabilities	Virtual Discussion	<ul style="list-style-type: none"> • As eviction moratoriums expire, there is significant need to prevent households from falling into homelessness. • There are eviction diversion programs that could use supportive service funding to keep families housed. • With rent prices increasing throughout the state, short- and medium-term rental assistance as well as funding for security deposits is critical.

Public Participation

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

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

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

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

- ***Public comment period:*** *start date* - Click or tap to enter a date. *end date* - 3/16/2022
- ***Public hearing:*** 3/9/2022

A 30-day public comment period, which sought to broaden citizen participation, was published on MFA’s, DFA’s website and in local newspapers in metro and rural areas. It started on February 15, 2022 and ended on March 16, 2022. A public hearing was held on March 9, 2022. In order to reach as many as possible additional formats upon request were made available in large print, braille, audio, Hamilton relay, TTY, voice, mobile caption and Spanish. During the public comment period MFA published a draft of its HOME-ARP plan on its website to seek public input. The public hearing was held in a hybrid in-person/virtual format to allow for broad public participation.

Describe any efforts to broaden public participation:

MFA conducted outreach for the plan by discussing HOME-ARP at events such as Albuquerque Affordable Housing Coalition meetings and presenting at meetings facilitated by the New Mexico Coalition to End Homelessness (New Mexico’s CoC).

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:

Enter narrative response here.

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

Enter narrative response here.

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.

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	#	#	#	#	#								
Transitional Housing	#	#	#	#	#								
Permanent Supportive Housing	#	#	#	#	#								
Other Permanent Housing						#	#	#	#				
Sheltered Homeless						#	#	#	#				
Unsheltered Homeless						#	#	#	#				
Current Gap										#	#	#	#

Suggested Data Sources: 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			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	#		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	#		
Rental Units Affordable to HH at 50% AMI (Other Populations)	#		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		#	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		#	
Current Gaps			#

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:

Point in Time (PIT) Count data from 2020 reports 2,704 households (3,333 individuals) were experiencing homelessness on a single night in January. Of the homeless households, 1,071 (39.6%) are unsheltered homeless households (1,259 persons). Of these unsheltered homeless households, 19 (1.7%) are households with children. Since 2016 homeless individual counted for PIT count data has increased by 47.3%.

Homelessness Management Information System (HMIS) data provided by the New Mexico Coalition to End Homelessness reports that 23,079 people sought help for homelessness in New Mexico during 2021. Among those people 1,468 were veterans, 2,772 were parenting, and 6,371 were chronically homeless. Black or African American persons make up 8.4% of the homeless population and American Indian Alaska Native persons comprise 15.3%. Both these groups are overrepresented in New Mexico's homeless population compared to the state's general population. Hispanic persons represent 47.7% of New Mexico's homeless population, which is nearly proportional to the state's general population. Males make up 53.7% of the state's homeless population, females comprise 43%, and trans or gender non-conforming persons account for .73%. (See appendix 2 for table on HMIS data describing the size and demographic composition the qualifying population in New Mexico.)

HMIS data from 2021 reports that among New Mexico's homeless population, many individuals deal with special needs including mental health conditions (35.1%), alcohol abuse (4.8%), substance abuse (8.4%), chronic health conditions, including persons with AIDS/HIV (21.7%), developmental disability (9.1%), physical disability (20.1%), and chronic homelessness (27.6%). Further this data shows that among our state's homeless population, there are veterans (6.4%), persons who have experienced domestic violence (28.9%), persons parenting (12.0%), youth aged 18-24 (7.7%), and seniors aged 62+ (7.5%).

Comprehensive Housing Affordability Strategy (CHAS) data from the 2014-2018 period shows that there are 102,190 households at or below 30% area median income, which reflects being at-risk of homelessness. American Community Survey data from the 2015-2019 period reports that 8,853 households are severely overcrowded (having more than 1.5 occupants per room) and are also considered at-risk of homelessness. Further 15,457 (35.7%) of the 43,258 renter households surveyed in New Mexico for the most Week 39 (September 29-October 11, 2021) of the Housing Pulse Survey reported being "very likely" or "somewhat likely" to leave their home due to eviction in the next two months. These households also reflect the at-risk of homelessness population in the state.

CHAS data from 2014-2018 data reports that in New Mexico there are 15,855 extremely cost burdened renter households with incomes between 30% and 50% household of the area median income, which is an indication of being at risk of homelessness. An analysis of data from the New Mexico Interpersonal Violence Data Central Repository found that in 2019 there were 25,375 domestic violence victims identified by law enforcement in New Mexico. This population

also faces a high risk of homelessness because when leaving an abusive relationship, long-term affordable housing options are scarce.

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:***

New Mexico's rental housing market has become increasingly competitive. In 2020 the average rent price was \$848, a 14% greater than 2016 average rent prices. Relatedly, vacancy rates have declined from 5.9% in 2016 to 4.3% in 2020. The tightening of the rental market has impacted low-income renters more than any other segment, who more than ever face challenges finding affordable rental units. Consequently, housing insecurity, including homelessness, has become a more acute concern for New Mexico.

As indicated by HMIS data, significant segments of the qualifying populations who are homeless have special needs, including substance use disorders and/or behavioral health conditions. These persons face limited options for housing that incorporates supportive services, which are critical to maintaining housing. 2020 Housing Inventory County (HIC) data shows that statewide the permanent supportive housing beds are utilized at a rate of 84%. During the consultation process, stakeholders emphasized that addressing deficit of permanent rental housing units, including permanent supportive housing units, will have the greatest and most lasting impact on reducing homelessness. Stakeholders also noted that there is a gap in short term housing solutions (emergency shelters are utilized at a rate of 82%) but that responding to the gaps in permanent housing is the most urgent concern.

For those currently housed populations, other families requiring services or housing assistance or to prevent homelessness, and those at greatest risk of housing instability or in unstable housing situations, there is a gap in homelessness prevention services. 2020 HIC data shows that the rapid-rehousing program in New Mexico is operating at full capacity. Further, funding for coronavirus relief programs, like the Emergency Rental Assistance Program and CARES Act Emergency Solutions Grant, are set to expire in the fall of this year. The loss of these resources coupled with termination of protections like eviction moratoria, make new supportive services for homelessness prevention especially critical to combating a rise in homelessness in the near future.

These groups face the risk of homelessness in part due to a lack of affordable permanent rental housing units. CHAS data reports that there are 56,040 renters at the 30% AMI level who are housing cost burdened. Among these renters, 33,330 are extremely cost burdened. Further 27,376 households are overcrowded. This housing condition issue is a reflection of an affordable

housing deficit when households are compelled to take in family and friends who are unable to secure housing for themselves and who might otherwise become homeless.

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:

The 2020 Housing Inventory Count (HIC) reports that there are 2,067 emergency shelter beds (82% utilization rate), 661 transitional housing beds (56% utilization rate), 820 rapid rehousing beds (100% utilization rate), and 2,070 permanent supportive housing beds (84% utilization rate). The HIC data includes non-federally funding programs, like the state-financed permanent supportive housing program Linkages.

For program year 2021-2022, MFA's recurring funding for homelessness prevention was \$798,748, for emergency shelter activities and operations the amount was \$941,768.00, and for Continuum of Care MFA received \$461,966. MFA administered \$3,001,884 for a state program called Linkages, which provides housing vouchers for individuals experiencing or at-risk of homeless who also have a serious mental illness. MFA total reoccurring funding for homelessness and homelessness prevention was \$5,204,366.

MFA also received a one-time Coronavirus Aid, Relief, and Economic Security (CARES) Act Emergency Solutions Grant \$12,936,302 award, which it has put toward homelessness prevention and emergency shelter activities. This funding is set to expire in November 2022. While the CARES Act funding has been an essential resource for mitigating and addressing homelessness in the wake of the coronavirus, the recurring regular funding is insufficient to provide services statewide. Without additional funding for homelessness prevention, only 11 out of 33 New Mexico counties will retain these supportive services.

New Mexico received \$200,000,000 through the Emergency Rental Assistance Program. As of February 2022, the State of New Mexico and the City of Albuquerque have spent \$93,976,167 of their \$185,543,756.80 allocation on 40,247 awards. Any unspent balance will expire in September 2022. Beyond that period, resources will be needed to keep New Mexicans housed who are at-risk of homelessness.

MFA's 2021 National Housing Trust Fund allocation was \$6,111,129. While this resource essential resources for producing housing for extremely low-income households, the funding falls short of providing sufficient resources for rental housing development demand.

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

All partners cited that the lack of deeply affordable rental housing was the greatest gap in New Mexico's housing inventory, which is supported by quantitative housing data. Among renters, 54,537 (21.6%) households pay between 30% and 50% of their annual income on housing cost and 54,074 (21.4%) pay more than 50%. An analysis of 2019 American Community Survey

shows that there is only one affordable rental unit for every two renters with incomes less than \$25,000 and a gap of approximately 32,000 rental units for households at the 30% AMI level. An analysis completed by the Coalition for Supportive Housing found that New Mexico is in need of 7,299 supportive housing beds. (Coalition for Supportive Housing. Supportive Housing Needs in the United States. 2020.)

This gap has created a challenge for homeless service providers in transitioning the sheltered homeless population out of temporary housing and implementing homelessness prevention programs. Partners explained that the lack of housing affordable for extremely low-income households has made it difficult for even portable housing voucher holders to find and secure housing. Relatedly, partners noted that addressing homelessness for some of the most vulnerable unhoused persons demands an investment in permanent supportive housing. Persons who are homeless with behavioral health and/or medical conditions and other special needs require supportive services, including health care and case management, to achieve stable housing.

Homeless service providers noted that the many homeless persons lack options for immediate shelter or short-term transitional housing options. The lack of emergency shelters or space for the homeless to set up tents means many individuals experiencing homelessness live unsheltered and in unsafe conditions. These service providers explained that the development of non-congregate shelters should be low-barrier and align with the “Housing First” model, which focuses on triaging individuals and families to supportive services, health care, and permanent housing. Also, some Tribal housing partners cited a need for shelters for persons that have experienced or are fleeing domestic violence. Both homeless service providers and Tribal housing partners emphasized that shelters and temporary housing provides relief to individuals experiencing homelessness or at risk of homelessness but are not a solution that will result in an actual reduction of homelessness and extreme housing instability.

Partners agreed that in addition to responding to the needs of people currently experiencing homelessness, preventing homelessness is key to avoiding an exacerbated problem. Supportive services programs that offer short- and medium-term rental assistance to keep at risk households in their home, or quickly re-house persons who have lost their home, was cited as an essential homelessness prevention response that should be expanded. As eviction moratoriums expire, the need for these services is becoming more acute.

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:

MFA will not include any additional conditions in its definition of other qualifying populations as established in the HOME-ARP notice.

Identify priority needs for qualifying populations:

MFA has identified two priority needs for the qualifying population from its 2021 Consolidated Plan: 1) Affordable housing development and rehabilitation; and 2) Housing assistance for

vulnerable population. Using HOME-ARP funds for rental housing development addresses the first need through new construction or substantial rehabilitation of rental units targeted to these populations. Allocating HOME-ARP funds for supportive services activities, including, but not limited to, homelessness prevention and rapid re-housing assistance, addresses the second need.

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:

MFA relied primarily on four data sources to determine levels of need in the state: the Homelessness Management Information System (HMIS), the Point in Time (PIT) count, the Comprehensive Housing Affordability Strategy (CHAS) and the Housing Inventory Count (HIC). The HMIS data reflects the unduplicated count of persons seeking services for homelessness during calendar year 2021, which captures to a reasonable degree the prevalence of homelessness and those at risk of homelessness in New Mexico. The PIT count data provides an indication of the sheltered and unsheltered homeless population on a given night. CHAS data indicates the number of households at risk of homelessness. Finally, the HIC data captures the shelter and permanent supportive housing inventory and utilization rates.

Drawing on these quantitative data sources along with the feedback received during the consultation process supports the need for rental housing and supportive services for homelessness prevention. Responding to these needs will increase long-term housing stability for those experiencing and those at risk of homelessness.

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:

MFA intends to publish a Request for Proposals (RFP) to contract with housing developers for the rental housing activities. Through the RFP process for rental housing, MFA will incentivize partnerships between housing developers, property management companies, and entities that provide behavioral health services. One of the goals of these partnerships is to ensure that a portion of the rental units produced through the HOME-ARP program can support the special needs of the qualifying population.

MFA will use a Notice of Funding Availability (NOFA) or and RFP for supportive services for homelessness prevention. MFA seeks to utilize the service providers currently administering Emergency Solutions Grants homelessness prevention programs and maintain statewide coverage. MFA will also explore options to partner with state mandated eviction diversion programs.

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:

MFA will not provide any portion of the HOME-ARP administrative funds to a subrecipient or contractor prior to HUD's acceptance. MFA is not relying on any subrecipient or contractor to administer the entirety of its HOME-ARP grant.

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	\$ 9,000,000		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ 7,640,638		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 2,936,589	15 %	15%
Total HOME ARP Allocation	\$ 19,577,227		

Additional narrative, if applicable:

Enter narrative response here.

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:

MFA drew on feedback received during the consultation process and housing data to determine the plan to fund supportive services and rental housing development. MFA allocated \$7,640,638 to rental housing development to address the shortage of units affordable and suitable to the qualifying population. MFA allocated \$9,000,000 for supportive services because of the need to prevent homeless among the at-risk qualifying population and to assist those experiencing homelessness secure and maintain housing.

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:

MFA estimates that it can support between 60 and 150 rental housing units, depending on the financing structure of the developments

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:

By producing 60-150 new rental housing units MFA will address the affordable housing development and rehabilitation priority need. Throughout the consultation process, partners and stakeholders emphasized that addressing this deficit is key to reducing the number of people experiencing homelessness.

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.

In order to serve the greatest number of people in the qualifying population through the HOME-ARP program and to ensure program flexibilities that allow subrecipient and contractors to respond to their specific community needs, MFA will not incorporate any preferences.

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:

Enter narrative response here.

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:

Enter narrative response here.

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***

Enter narrative response here.

- ***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.***

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

Appendix 1: Entities Invited to Participate in the HOME-ARP Consultations

<i>Entities that Attended a Consultation and Provided Input</i>	<i>Entity Type</i>
New Mexico Coalition to End Homelessness	New Mexico Continuum of Care
New Mexico Center for Law & Poverty	Organizations that address civil rights, fair housing, and people with disabilities
Greater Albuquerque Housing Partnership	Other public or private agency that addresses the need of the qualifying population (rental housing developer)
Santa Fe Civic Housing Authority	Public/Tribal Housing Authority
Mesilla Valley Public Housing Authority	Public/Tribal Housing Authority
Pueblo of Acoma Housing Authority	Public/Tribal Housing Authority
Albuquerque Housing Authority	Public/Tribal Housing Authority
San Felipe Pueblo Housing Authority	Public/Tribal Housing Authority
St. Elizabeth Shelter	Homelessness Supportive Services Provider
Chicanos Por La Causa/HELP NM	Homelessness Supportive Services Provider
HopeWorks	Homelessness Supportive Services Provider
Beaux Simone Consulting	Other public or private agency that addresses the need of the qualifying population (rental housing developer)
Project Moxie	Other public or private agency that addresses the need of the qualifying population (rental housing developer)
Mesilla Valley Community of Hope	Other public or private agency that addresses the need of the qualifying population (rental housing developer)
YES Housing	Other public or private agency that addresses the need of the qualifying population (rental housing developer)
Families and Youth, Inc.	Homelessness Supportive Services Provider/Recover & Transitional Housing

New Day Youth and Family Services	Homelessness Supportive Services Provider/Recover & Transitional Housing
Albuquerque Health Care for the Homeless, Inc.	Homelessness Supportive Services Provider/Recover & Transitional Housing
Alianza of New Mexico	Homelessness Supportive Services Provider
Heart of Taos- HEART House	Homelessness Supportive Services Provider/Recover & Transitional Housing
<i>Entities that Attended a Consultation and Did Not Provided Input</i>	<i>Entity Type</i>
El Camino Real Housing Authority	Public/Tribal Housing Authority
JL Gray	Other public or private agency that addresses the need of the qualifying population (rental housing developer)
Barrett Foundation, Inc.	Homelessness Supportive Services Provider/Recover & Transitional Housing
<i>Entities that Were Invited But Did Not Attended A Consultation Opportunity</i>	<i>Entity Type</i>
Jemez Pueblo Housing Department	Public/Tribal Housing Authority
Mescalero Apache Tribe Housing Department	Public/Tribal Housing Authority
Santa Clara Pueblo Housing Authority	Public/Tribal Housing Authority
Pecos Housing Authority	Public/Tribal Housing Authority
Alamogordo Housing Authority	Public/Tribal Housing Authority
Santa Clara Housing Authority	Public/Tribal Housing Authority
Isleta Pueblo Housing Authority	Public/Tribal Housing Authority
Jicarilla Apache Housing Authority	Public/Tribal Housing Authority
Wagon Mound Housing Authority	Public/Tribal Housing Authority
Tucumcari Housing Authority	Public/Tribal Housing Authority
Santa Fe County Housing Authority	Public/Tribal Housing Authority
Springer Housing Authority	Public/Tribal Housing Authority

Taos Pueblo Housing Authority	Public/Tribal Housing Authority
Clayton Housing Authority	Public/Tribal Housing Authority
Southern Ute Indian Housing Authority	Public/Tribal Housing Authority
Truth or Consequences Housing Authority	Public/Tribal Housing Authority
Bayard Housing Authority	Public/Tribal Housing Authority
San Juan Housing Authority	Public/Tribal Housing Authority
Artesia Housing Authority	Public/Tribal Housing Authority
Rio Arriba Housing Authority	Public/Tribal Housing Authority
Chama Housing Authority	Public/Tribal Housing Authority
Fort Sumner Housing Authority	Public/Tribal Housing Authority
Raton Housing Authority	Public/Tribal Housing Authority
Eastern Regional Housing Authority	Public/Tribal Housing Authority
Santa Clara Village Housing Authority	Public/Tribal Housing Authority
County of Sandoval Permanent Supportive Housing	Public/Tribal Housing Authority
Bernalillo County Housing Department	Public/Tribal Housing Authority
Sunland Park Housing Authority	Public/Tribal Housing Authority
Sandia Pueblo	Public/Tribal Housing Authority
Native Partnership for Housing	Public/Tribal Housing Authority
Clovis Housing Authority	Public/Tribal Housing Authority
Pueblo of Pojoaque	Public/Tribal Housing Authority
Santo Domingo Housing Authority	Public/Tribal Housing Authority
Northern Pueblos Housing Authority (Picuris, Tesuque, San Ildefonso)	Public/Tribal Housing Authority
Las Vegas Housing Authority	Public/Tribal Housing Authority
Gallup Housing Authority	Public/Tribal Housing Authority
Western Regional Housing Authority	Public/Tribal Housing Authority

Pueblo of Zuni Housing Authority	Public/Tribal Housing Authority
Pueblo of Zia Housing Services	Public/Tribal Housing Authority
Nambé Pueblo Housing Entity	Public/Tribal Housing Authority
Pueblo de Cochiti Housing Authority	Public/Tribal Housing Authority
Lordsburg Housing Authority	Public/Tribal Housing Authority
Navajo Housing Authority	Public/Tribal Housing Authority
Rio Arriba County Housing Authority	Public/Tribal Housing Authority
Cuba Housing Authority	Public/Tribal Housing Authority
City of Santa Fe Housing and Community Development	Public/Tribal Housing Authority
Okhay Owingeh Housing Authority	Public/Tribal Housing Authority
Tamaya Housing Inc.	Public/Tribal Housing Authority
Assurance Home	Homelessness Supportive Services Provider
Barrett Foundation	Homelessness Supportive Services Provider
Center of Protective Environment (COPE)	Homelessness Supportive Services Provider
DreamTree	Homelessness Supportive Services Provider
El Refugio	Homelessness Supportive Services Provider
Family Crisis Center	Homelessness Supportive Services Provider
Grammy's House	Homelessness Supportive Services Provider
Hartley House	Homelessness Supportive Services Provider
Haven House	Homelessness Supportive Services Provider
Heading Home	Homelessness Supportive Services Provider
Option, Inc.	Homelessness Supportive Services Provider
S.A.F.E. House	Homelessness Supportive Services Provider
Valencia Shelter Services	Homelessness Supportive Services Provider
CLNkids, Inc.	Homelessness Supportive Services Provider

Crisis Center of Northern NM	Homelessness Supportive Services Provider
Enlace Comunitario	Homelessness Supportive Services Provider
The Life Link	Homelessness Supportive Services Provider
San Juan County Partnership	Homelessness Supportive Services Provider
Abode Inc.	Homelessness Supportive Services Provider
Catholic Charities	Homelessness Supportive Services Provider
La Casa Inc.	Homelessness Supportive Services Provider
Housing Trust	Other public or private agency that addresses the need of the qualifying population (rental housing developer)
Steelbridge Ministries	Homelessness Supportive Services Provider/Recover & Transitional Housing
Amistad Crisis Shelter - YDI	Homelessness Supportive Services Provider/Recover & Transitional Housing
Casa Hermosa- YDI	Homelessness Supportive Services Provider/Recover & Transitional Housing
Santa Fe Recovery Center	Homelessness Supportive Services Provider/Recover & Transitional Housing
People Assisting the Homeless (PATH)	Homelessness Supportive Services Provider/Recover & Transitional Housing
Women's Housing Coalition	Homelessness Supportive Services Provider/Recover & Transitional Housing
Community Against Violence, Inc.	Homelessness Supportive Services Provider/Recover & Transitional Housing
Town of Taos	Homelessness Supportive Services Provider/Recover & Transitional Housing
Pueblo of Santa Clara	Homelessness Supportive Services Provider/Recover & Transitional Housing
New Mexico Veterans Integration Center	Homelessness Supportive Services Provider/Recover & Transitional Housing

Childhaven	Homelessness Supportive Services Provider/Recover & Transitional Housing
Casa Esperanza	Homelessness Supportive Services Provider/Recover & Transitional Housing
All Faiths Receiving Home	Homelessness Supportive Services Provider/Recover & Transitional Housing
La Casa, Inc.	Homelessness Supportive Services Provider/Recover & Transitional Housing
Santa Clara Pueblo Behavioral Health	Homelessness Supportive Services Provider/Recover & Transitional Housing
Rio Arriba County	Homelessness Supportive Services Provider/Recover & Transitional Housing
City of Espanola	Homelessness Supportive Services Provider/Recover & Transitional Housing
Community Against Violence	Homelessness Supportive Services Provider/Recover & Transitional Housing
Espanola Pathways Shelter	Homelessness Supportive Services Provider/Recover & Transitional Housing
Good Shepherd Center	Homelessness Supportive Services Provider/Recover & Transitional Housing
New Mexico AIDS Services	Homelessness Supportive Services Provider/Recover & Transitional Housing
El Centro Family Health	Homelessness Supportive Services Provider/Recover & Transitional Housing
Crossroads for Women	Homelessness Supportive Services Provider/Recover & Transitional Housing
San Juan Catholic Charities	Homelessness Supportive Services Provider/Recover & Transitional Housing
Susan's Legacy	Homelessness Supportive Services Provider/Recover & Transitional Housing
El Refugio, Inc.	Homelessness Supportive Services Provider/Recover & Transitional Housing

Youth Shelters & Family Services	Homelessness Supportive Services Provider/Recover & Transitional Housing
Silver City Gospel Mission	Homelessness Supportive Services Provider/Recover & Transitional Housing
Therapeutic Living Services, Inc.	Homelessness Supportive Services Provider/Recover & Transitional Housing
Saranam, LLC	Homelessness Supportive Services Provider/Recover & Transitional Housing

Appendix 2: Homelessness Management Information System (HMIS) Data on New Mexico's Homeless Population Size and Demographic Characteristics (Calendar Year 2021)

Total Persons Seeking Services for Homelessness	23,079	
Gender		
Male	12385	53.7%
Female	9925	43.0%
Trans	134	0.58%
Gender Non-Conforming	34	0.15%
Client Does Not Know/No Data Collected	601	2.6%
Race		
White	15312	66.3%
Black or African American	1932	8.4%
Asian	75	0.3%
American Indian Alaska Native	3542	15.3%

Native Hawaiian or Other Pacific Islander	191	0.8%
Multiple Races	774	3.4%
Client Does Not Know/No Data Collected	1253	5.4%
Ethnicity		
Non-Hispanic/Non-Latino	11152	48.3%
Hispanic/Latino	11014	47.7%
Client Does Not Know/No Data Collected	913	4.0%
Age		
Under 17 (Children)	4588	19.9%
18-24 (Youth)	1781	7.7%
25-61 (Adult)	14298	62.0%
62+ (Senior)	1729	7.5%
Client Does Not Know/No Data Collected	683	3.0%