

**CITY OF
BIRMINGHAM**



ALLOCATION PLAN HOME-ARP

CITY OF BIRMINGHAM
DEPARTMENT OF COMMUNITY DEVELOPMENT
710 20TH STREET N
BIRMINGHAM, AL 35203

Introduction

On March 11, 2021, President Biden signed the HOME Investment Partnerships Program – American Rescue Plan (HOME-ARP) into law, which provides over \$1.9 trillion in relief to address the continued impact of the COVID-19 pandemic. The U.S. Department of Housing and Urban Development (HUD) through the Home Investment Partnerships (HOME) Program Grant has allocated the City of Birmingham **\$5,074,139.00** from the American Rescue Plan (ARP) Act (ARP) of 2021.

The HOME-ARP funds will be allocated to benefit the following qualifying populations:

- Homeless
- At-risk of homelessness
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, human trafficking
- Other populations where providing supportive services or assistance would prevent the family's homelessness or would serve those at greater risk of homelessness
- Veterans and families that include a veteran that meets one of the preceding criteria

Per HUD guidelines the activities described in the proposed plan must primarily benefit the qualifying individuals and families who are homeless, at risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or in other vulnerable populations as defined below:

Qualifying Populations

QP1: HOMELESS

Homeless as defined in [24 CFR 91.5](#), **1**, **2**, or **3** below:

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - b. 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



- c. 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:
 - a. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - b. No subsequent residence has been identified; and
 - c. 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:
 - a. 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);
 - b. 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;
 - c. 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
 - d. 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;

QP2: AT RISK OF HOMELESSNESS

At risk of homelessness as defined in [24 CFR 91.5](#), below

1. An individual or family who:
 - a. Has an annual income below 30 percent of median family income for the area, as determined by HUD;



- b. 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
- c. Meets one of the following conditions:
 - i. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - ii. Is living in the home of another because of economic hardship;
 - iii. 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;
 - iv. 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;
 - v. 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;
 - vi. 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
 - vii. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
- 2. A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
- 3. A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

QP3: FLEEING OR ATTEMPTING TO FLEE, DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, STALKING, OR HUMAN TRAFFICKING

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. This population includes cases where an individual or family reasonably believes that



there is a threat of imminent harm from further violence due to 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 or remain within the same dwelling unit. In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the same dwelling unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

Domestic violence, which is defined in [24 CFR 5.2003](#) includes felony or misdemeanor crimes of violence committed by:

1. A current or former spouse or intimate partner of the victim (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);
2. A person with whom the victim shares a child in common;
3. A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner;
4. A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving HOME-ARP funds; or
5. 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.

Dating violence which is defined in 24 CFR 5.2003 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:
 - a. The length of the relationship;
 - b. The type of relationship; and
 - c. The frequency of interaction between the persons involved in the relationship.

Sexual assault which is defined in 24 CFR 5.2003 means any nonconsensual sexual act proscribed by Federal, Tribal, or State law, including when the victim lacks capacity to consent.

Stalking which is defined in 24 CFR 5.2003 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.

Human Trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102). These are defined as:



1. Sex trafficking means the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose 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 act has not attained 18 years of age; or
2. Labor trafficking means the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

QP4: OTHER QUALIFYING POPULATIONS

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);
 - 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 of the “At risk of homelessness” definition above, established at [24 CFR 91.5](#)

NOTE: Veterans and Families that include a Veteran Family Member that meet the criteria for one of the Qualifying Populations described above are also eligible to receive HOME-ARP assistance.

Eligible Activities

Eligible activities that may be funded with HOME-ARP include:

- o Preservation and Production of affordable rental housing
- o Tenant Based Rental Assistance (TBRA)
- o Housing Related Supportive Services, Homeless Prevention Services, and Housing Counseling
- o Purchase and Development of Non-Congregate Shelters (NCS)
- o Non-Profit Operating and Capacity Building



o Administration and Planning Costs

HUD issued guidance for the utilization of the HOME-ARP funds through CPD-Notice 21-10 on September 13, 2021, to ensure the funds are intended to benefit qualifying populations and be used for specific activities not necessarily normally permitted under the HOME Program. HOME ARP sub-recipients must create an allocation plan which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. The development of the HOME-ARP Allocation Plan must also be informed through stakeholder consultation and community engagement. The City of Birmingham (“the City”) has prepared the following HOME-ARP Allocation Plan for review, consideration, and acceptance by HUD

Consultation

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

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

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

SUMMARY OF THE CONSULTATION PROCESS

Before the development of this allocation plan, The City of Birmingham collaborated with housing partners and service providers serving the Birmingham metropolitan area. During the consultation process, the City engaged over 30 housing partners and agencies whose clientele include the HOME-ARP qualifying populations to identify unmet needs and gaps in housing or service delivery systems. The City of Birmingham also met with the CoC on multiple occasions virtually and in-person with the final in-person meeting taking place Friday, December 8, 2023.

The City facilitated outreach to partners through surveys and in-person/virtual meetings. Stakeholders’ comments were documented via (1) surveys and (2) assessment documents which summarizes feedback from various stakeholder engagement sessions. The City published a survey online soliciting feedback from stakeholders, affordable housing developers, and community members about homelessness needs in the City and HOME-ARP eligible activities and projects planned. The survey was made accessible at birminghamal.gov/community-



development/. The survey was also sent via email directly to many community stakeholders. There were 48 responses received. Summary responses identified the development of affordable housing as the top priority for HOME-ARP funding as shown in the chart below.

SURVEY

The online HOME-ARP survey was sent to the consultation contact list and remains open to date. The survey was completed by 50 stakeholders from 34 distinct organizations and agencies. The brief survey consisted of 13 total questions. The first ten questions gathered data pertaining to the homeless population and housing. The last three questions gathered contact and organizational information. Reference Appendix A to view the complete survey.

1. What are the most pressing needs to address homelessness in Birmingham? Please rank the following ARP Funding Categories based on community homeless need, with 1 being your highest homeless priority need and 5 being the lowest homeless priority need.

☰ Production of Affordable Housing	^	▼
☰ Preservation of Affordable Housing	^	▼
☰ Tenant-Based Rental Assistance (TBRA)	^	▼
☰ Supportive Services, Homeless Prevention Services and Housing Counseling	^	▼
☰ Purchase and/or Development of Non-Congregate Shelter	^	▼

Figure 1: Ranking question used in the City's HOME-ARP Survey



8. Are there other eligible uses of this funding that were not specifically asked about that you think should be considered for potential funding?

9. Name two possible locations for a non-congregate shelter?

10. If a non-congregate shelter(s) was developed, how could operating costs be sustained once HOME ARP funds have been expended?

Figure 2: Open-ended questions used in the City's HOME-ARP Survey

The responses to the open-ended questions have been integrated into the List of Agencies/Organizations Consulted section below. The City has organized this summarized information by respondent organization or agency, shown in the feedback column.

In March of 2022, Mayor Randall Woodfin established a Neighborhood Housing and Homelessness Subcommittee with a goal to identify workable solutions for those experiencing homelessness and strategies for expanding affordable housing. The group met in person on a weekly basis to develop a strategy that would support the City's collective housing goals. The weekly meetings included as many community voices as possible to obtain targeted feedback related to homelessness and affordable housing needs in Birmingham. The subcommittee developed two subgroups—one for housing and one for homelessness—that met on a weekly basis to complete surveys, gather public feedback, and best practices for potential pilot projects.

The following charts and graphs represent the types of organizations the respondents represent and the most need in the City.



Figure 3: Respondent's organization/agency type from the City's HOME-ARP Survey

Summary of comments and recommendations received through the consultation process:

Responses from the stakeholder agencies significantly identified the development of more affordable rental housing as the greatest priority, however many also commented that there was a need for additional non-congregate transitional housing with ongoing case management and supportive services. This included a range of services from counseling, workforce training, legal services, education/training, food, medical, etc.

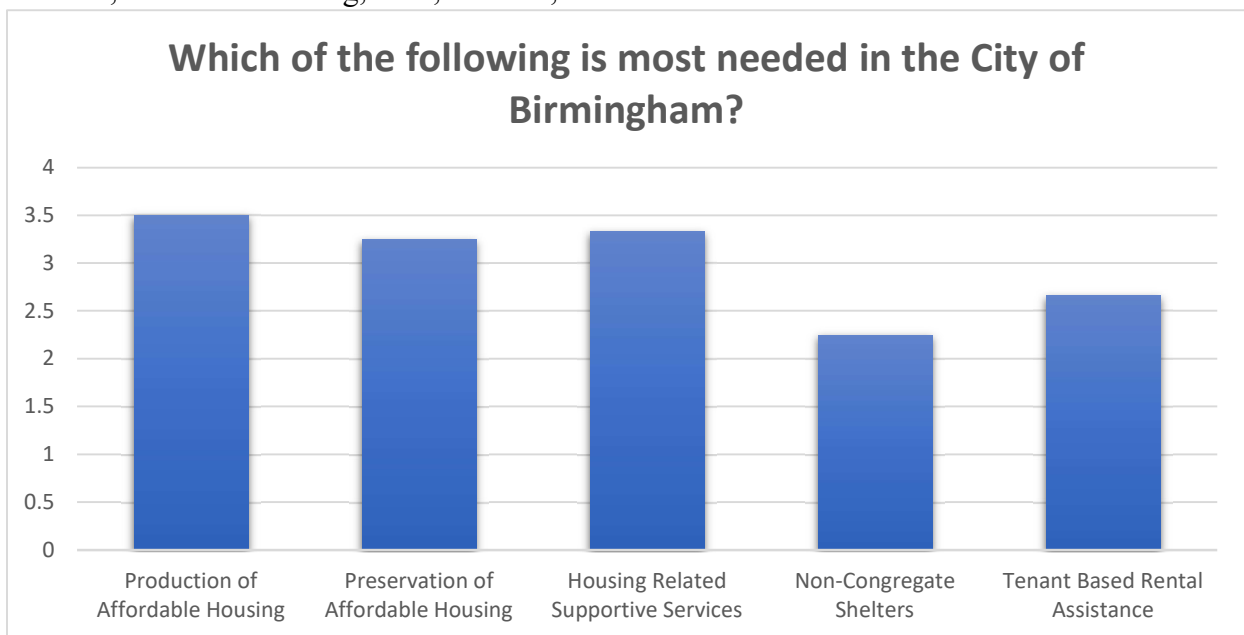


Figure 4: Respondents were asked to rank the most needed service

The City also engaged REV Birmingham, a place-based revitalization & economic development nonprofit, who performed research and developed a set of recommendations for long-term projects to address the lack of housing for persons experiencing homelessness. Long term projects identified by the community included non-congregate shelter and transitional/supportive housing models. Additionally, REV researched and identified the potential ways a new facility can provide more services for the community. REV Birmingham’s work included convening a group of local, boots-on-the-ground experts to steer the process of data gathering, research, and design of housing solutions. Over three work sessions, seven Birmingham homeless service providers and representatives from the faith-based community discussed best practices, viable solutions, and potential service management structures.

REV then conducted outreach surveys to homeless and housing insecure citizens in Birmingham over the course of 15 days. Outreach included strategically partnering with service centers, church food giveaways and homeless shelters to conduct citizen surveys. Outreach members also canvassed in local parks and areas of Birmingham that homeless populations regularly frequent. Feedback collected from the working sessions and surveyed citizens validated service providers’ experiences and revealed new opportunities to address non-congregate shelter and transitional housing needs in Birmingham.

List of Agencies/Organizations Consulted

For purposes of this table, the Qualifying Populations served are below:

- QP1 - Homeless households, as defined by HUD
- QP2 - Households at risk of homelessness
- QP3 - Households fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking
- QP4 - Households at greatest risk of housing instability.

Agency/Org Consulted	Type of Agency/Org	Qualifying Population Served	Method of Consultation	Feedback
Community Care Development Network	Faith Based Nonprofit/Service Provider	QP1	Survey	Identified moving expenses as another eligible use of funding that was not considered.
Food For Our Journey	Nonprofit/Service Provider	QP1	Survey	Identified mental health and drug counseling services as another eligible use of funding that was not considered.
AIDS Alabama, Inc.	Social Services Organization	QP1 & QP2	Survey	Indicated the non-congregate shelters should be in the vicinity of the Firehouse Shelter, the

Agency/Org Consulted	Type of Agency/Org	Qualifying Population Served	Method of Consultation	Feedback
				under construction AIDS Alabama facility and Faith Chapel. Another possibility might be to convert the King's Inn to a congregate shelter
Woodlawn United	Service Provider *Veteran Serving	QP2	Survey	Identified Day Centers with transitional housing for the overnight hours as another eligible use of funding that was not considered.
The Help Project	Economic Development Agency	QP1	Survey	Identified specifically, housing for 30% AMI and below.
Love/Light	Service Provider *Veteran Serving	QP1	Survey	Identified home repair assistance for residents, assistance with foreclosure prevention, and new and old homeowner education as other uses of funding that was not considered.
The Housing Authority of the Birmingham District	Housing Authority	QP1 & QP2	Survey	Identified services specifically designed for young people experiencing or at risk for homelessness as an eligible expense that was not considered.
Strengthening Hearts	Unknown	QP1	Survey	Identified single parents as a population needing more assistance.
Birmingham City Council	Local Government *Veteran Serving	QP1, QP2, QP3 & QP4	Survey	Identified educating the general public about discrimination in housing and air pollution as an eligible use of funding that was not considered.
Lifting As We Climb Foundation	Social Services Organization	QP1	Survey	Identified the following as expenses that should be funded: 1) Relocation Assistance (Moving Expenses, Transitional Housing, Permanent Relocation, Temporary Storage, etc.); 2) Transportation Assistance, Bus Fare, Transportation Services, etc.
Woodlawn Community	Non-profit	QP1 & QP4	Survey	Indicated that converting one of the motels to High quality full wrap around services facility -



Agency/Org Consulted	Type of Agency/Org	Qualifying Population Served	Method of Consultation	Feedback
Table/Food Bank				1st Avenue North (Woodlawn) would be a good option.
United Way of Central Alabama	Non-profit *Veteran Serving	QP1, QP2, QP3 & QP4	Survey	Identified addressing food security as an eligible expense that was not identified.
YMCA	Service Provider	QP4	Survey	Identified an intensive approach to improving Tenant-Based Rental Assistance or introducing more effective Tenant-Based Rental Assistance is something the community could benefit from.
YWCA	Service Provider	QP2 & QP3	Survey & Virtual Meeting	Indicated that all entities of the community should share the costs for one of the most vulnerable groups of our community.
Faith Chapel Christian Center	Faith Based Nonprofit/Service Provider	QP1	Survey, Virtual Meeting, & In-person Meeting	Indicated that there should be some type of work development project to assist with funding non-congregate shelters.
Garland Highlands Neighborhood	Neighborhood Association	N/A	Survey	Indicated that having Housing Authority project-based vouchers for the facility would assist with funding non-congregate shelters.
Titusville Development Corporation	Nonprofit/Community Housing Development Organization	QP2	Survey	Indicated a system (OJT, Employer Owned System, or Vested Services) that allows residents to operate the facility or even own it would be best.
NHS Birmingham, Inc.	Nonprofit/Community Housing Development Organization	QP2 & QP4	Survey	Identified Downtown Birmingham, Alabama or on the North part of Birmingham Downtown as good locations for non-congregate shelters.
Echo Highlands Neighborhood	Neighborhood Association	N/A	Survey	Identified JCCO Headquarters 300 8th Ave W, Birmingham, AL 35204, as a good location for non-congregate shelters.
Baldwin Properties	Real Estate Agency	QP2	Survey	Identified Elyton School - 100 Tuscaloosa Ave. SW; 2337



Agency/Org Consulted	Type of Agency/Org	Qualifying Population Served	Method of Consultation	Feedback
				Nabors Rd SW, Birmingham, AL 35211; 2900 S Park Dr SW, Birmingham, AL 35211; and - A.G. Gaston 4401 4th Avenue South, Birmingham, AL 35222, as good locations for non-congregate shelters.
Aletheia House	Nonprofit/Service Provider *Veteran Serving	QP1, QP2, QP3 & QP4	Survey	Identified Carraway Hospital and Calloway School as good locations for non-congregate shelters.
Firehouse Ministries Homeless Shelter	Nonprofit/Service Provider	QP1	Survey & Virtual Public Hearing	Identified the former Ramada Inn property at I-65 and the plan curve area downtown as potential sites for non-congregate shelters.
Kingston Neighborhood Association	Neighborhood Association	N/A	Survey	Indicated that a non-congregate shelter would best be suited in a common community where they can feel a part of that community that will allow jobs and build the community stronger.
Family Promise of Birmingham	Nonprofit/Service Provider	QP1	Survey	Identified McArthur school site as a potential site for non-congregate shelters.
Franklin Outreach Ministries	Franklin Outreach Ministries	QP1	Survey	Identified Warehouses and foreclosed hotels/motels as potential sites for non-congregate shelters.
iHICA! Hispanic Interest Coalition of Alabama	Nonprofit/Service Provider	QP2	Survey	Identified language access. Hiring interpreters and translators to produce materials in different languages as an additional eligible expense that was not considered.
Community on the Rise	Nonprofit/Service Provider	QP1	Survey	Identified the use of tiny homes on City owned land as an eligible expense that was not identified.
Grace Episcopal Church	Faith Based Nonprofit/Service Provider	QP1	Survey	Indicated that the Western side of Birmingham needs a homeless shelter for men and



Agency/Org Consulted	Type of Agency/Org	Qualifying Population Served	Method of Consultation	Feedback
				women that operates similar to Brother Bryan that ministers to their needs and requires them to have a job to prepare.
St. Paul UMC	Faith Based Nonprofit/Service Provider	QP1	Survey	Indicated that any non-congregate shelter should be in a low traffic area where impact on businesses and residents is low. The new Firehouse location and Jimmie Hale location are examples of well-located shelters.
First Presbyterian Church	Faith Based Nonprofit/Service Provider	QP1	Survey	Indicated 1. Abandoned apartments 2. Abandoned hospital like Carraway would be good locations for non-congregate shelters, but must be strategic on placement such as sex offenders and mental health patients
Christian Service Mission	Faith Based Nonprofit/Service Provider	QP2	Survey	Identified supportive housing programs that offer rent-free safe, quality housing connected to life skills-training, trauma-informed care, and counseling to help people move to stability and out of homelessness as eligible expenses that were not considered.
Offender Alumni Association	Nonprofit	QP2	Survey	Indicated an eligible expense that was not considered is funding educational programs for landlords to understand the opportunities to assist the homeless.
Family Connection	Nonprofit/Service Provider	QP1	Survey	Indicated supportive housing programs that offer rent-free safe, quality housing connected to life skills-training, trauma-informed care, and counseling to help people move to stability and out of homelessness.



Agency/Org Consulted	Type of Agency/Org	Qualifying Population Served	Method of Consultation	Feedback
Pathways	Nonprofit/Service Provider	QP1	Survey & Virtual Meeting	Indicated that an additional eligible expense would be to address gun and violence by investing in neighborhoods.
Alabama Legal Service	Nonprofit	QP1 & QP2	Virtual Public Hearing	Expressed the need for a case management portion to any potential proposals.
The High Mountain Group	Property Management	QP2	Virtual Public Hearing	Participated in group feedback.
Offender Alumni Association	Nonprofit	QP2	Virtual Public Hearing	Participated in group feedback.
United Way of Central Alabama	Nonprofit *Veteran Serving	QP1, QP2, QP3 & QP4	Virtual Public Hearing	Participated in group feedback.
Wilhoit Properties Inc.	Property Management	QP2	Virtual Public Hearing	Participated in group feedback.
The Housing Authority of the Birmingham District	Housing Authority *Veteran Serving	QP1 & QP2	Virtual Public Hearing & Virtual Meeting	Participated in group feedback.
Aletheia House	Nonprofit/Service Provider *Veteran Serving	QP1, QP2, QP3 & QP4	Virtual Public Hearing	Participated in group feedback.
Birmingham Urban League	Nonprofit	QP4	Virtual Public Hearing	Participated in group feedback.
One Roof	Service Provider CoC Collaborative Applicant/Lead *Veteran Serving	QP1, QP2, QP3 & QP4	Virtual Public Hearing & In-person Meetings	Participated in group feedback. Indicated that those individuals that are chronically at risk of homelessness need to be prioritized.
Foundry Ministries	Service Provider	QP1 & QP3	Virtual Public Hearing	Participated in group feedback.
Help Birmingham	Nonprofit	QP1	Virtual Public Hearing	Participated in group feedback.



Agency/Org Consulted	Type of Agency/Org	Qualifying Population Served	Method of Consultation	Feedback
Habitat for Humanity	Nonprofit/Service Provider	QP2	Virtual Public Hearing	Participated in group feedback.
Titusville Development Corporation	Nonprofit/Community Housing Development Organization	QP2	Virtual Public Hearing	Participated in group feedback.
AIDS Alabama	Service Provider	QP1 & QP2	Virtual Public Hearing	Participated in group feedback.
Woodlawn United	Faith Based Nonprofit/Service Provider	QP2	Virtual Public Hearing	Participated in group feedback.
Food For Our Journey	Nonprofit/Service Provider	QP1	Virtual Public Hearing	Participated in group feedback.
Fair Housing Center of North Alabama	Nonprofit/Service Provider	QP2	Virtual Public Hearing	Participated in group feedback.
Department of Veteran Affairs	Service Provider *Veteran Group	QP1, QP2, QP3, & QP4	Virtual Meeting	Identified the need for financial assistance for veterans to get into housing and financial assistance to prevent a return to homelessness.

Public Participation/Stakeholder Input Meetings

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

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

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



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

Three (3) Virtual Public hearings were held at the following times on the following date(s):

- ***Date(s) of public hearings:*** 4/13/2022 at 9:30 AM: 4/13/2022 at 5:00 PM 4/22/2022 at 10:00 AM

The public comment period was held on the following dates:

- ***Date(s) of public notice:*** 5/8/2024
- ***Public comment period: start date – 5/8/2024 end date 5/23/2024***

The public was encouraged to participate in the allocation plan development process via multiple efforts.

- The City of Birmingham notified the public with a notice in the local newspaper, The Birmingham News and Alabama Messenger on March 30, 2022 and May 8, 2024 respectively.
- The City of Birmingham held multiple public hearings via Webex.

The virtual public hearings focused on housing and community development needs in preparation for the forthcoming HOME-ARP allocation plan as well as gathering community needs for qualifying populations identified in the HOME-ARP guidance. The HOME-ARP Public Hearing Notice was distributed through our Community Development Department's Listserv via email as well as newspaper listings. The City of Birmingham provided notice that the HOME-ARP allocation plan was made available to persons needing special assistance (such as translated materials) or a reasonable accommodation by request. Ongoing efforts also included targeted meetings to engage with agencies that serve Birmingham's qualifying populations.

Each agency serves at least one and sometimes multiple qualified populations as outlined in subsequent sections of this Allocation Plan below. A comprehensive list of partners and agencies consulted during the development of this allocation plan is included in the preceding table.

Comments received throughout the public hearing meetings and stakeholder engagement period resulted in the content of this Allocation Plan. These comments are captured in the compiled comments in Appendix B. Written comments received during public engagement sessions included 10 separate emailed comments. Comments received were largely geared towards HOME-ARP Allocation Plan details, future timeline of funding availability, and RFP solicitations.



There were many comments collected from an online survey and the public hearings. All comments received have been compiled and may be found in Appendix B.

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

There were no comments that were received that were not accepted.

Needs Assessment and Gaps Analysis

*In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.*

HUD issued guidance for the utilization of the HOME-ARP funds through CPD-Notice 21-10 on September 13, 2021. The HOME-ARP funding is different from traditional HOME funding. Traditional HOME grants fund the construction or development of affordable housing, including the acquisition and rehabilitation of housing for renters or owners, for households that earn 80 percent or less of the Area Median Income (AMI), known as very-low to low-income households. HOME funds, in addition to paying for construction activities, can fund down payment assistance to homebuyers or rental assistance for households who rent their home. HOME funds cannot be used for provision of services or for the development of shelters.

Key differences for the HOME-ARP funding are outlined in the HUD issued CPD-Notice 21-10. The notice outlines a range of activities that can be funded under this special allocation and the populations that can be served. HOME-ARP funds can be used for the following: 1) administration and planning activities, 2) acquisition, rehabilitation, and construction of rental housing, 3) provision of supportive services, 4) tenant based rental assistance, 5) acquisition and development of non-congregate shelter units, and 6) non-profit operating and capacity building. Non-congregate shelter units were utilized by many communities nationwide to house homeless individuals and families safely, minimizing exposure and spread of COVID-19.

The populations that can be served with HOME-ARP funds are different from traditional HOME funding requirements. HOME-ARP funds can only be used to serve specific populations, known as Qualifying Populations. Qualifying populations are as follows and additional information about the Qualifying Populations can be found in Section IV.A of CPD-Notice 21- 10. See introduction of this plan for full definition of each qualifying population



QP1: Homeless households

QP2: Households at risk of homelessness.

QP3: Households fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking.

QP4 Other Populations:

Households requiring services or housing assistance to prevent homelessness. These are households who have been previously qualified as homeless and are currently housed but receiving temporary or emergency assistance to avoid a return to homelessness.

Households at greatest risk of housing instability. For HOME-ARP funds, this means a household that is either extremely-low income (earns less than 30% AMI) AND is experiencing severe cost burden (paying more than 50% of monthly income towards housing costs); or is low-income (earns between 31-50% AMI) AND meets one of the conditions of "at risk of homelessness".

Note: Veterans or families with a veteran who also meet one or more of the above definitions are eligible.

Since these are the only populations the City of Birmingham may serve under this funding resource, the City of Birmingham will only evaluate data regarding the housing gaps for this data population. The Area Median Income is updated annually by HUD for purposes of the HOME Program and vary by household size.



City of Birmingham, Alabama						
HOME Investment Partnerships American Rescue Plan Program (HOME-ARP)						
Income Limits by Household Size - Effective 2022						
Persons per Household	Percent of Area Median Income					
	Extremely Low Income		Very Low Income		Low Income	
	20%	30%	40%	50%	60%	80%
1	\$ 11880	\$ 17850	\$ 23760	\$ 29700	\$ 35640	\$ 47500
2	13580	20400	27160	33950	40740	54300
3	15280	22950	30560	38200	45840	61100
4	16960	25450	33920	42400	50880	67850
5	18320	27500	36640	45800	54960	73300
6	19680	29550	39360	49200	59040	78750
7	21040	31600	42080	52600	63120	84150
8	22400	33600	44800	56000	67200	89600

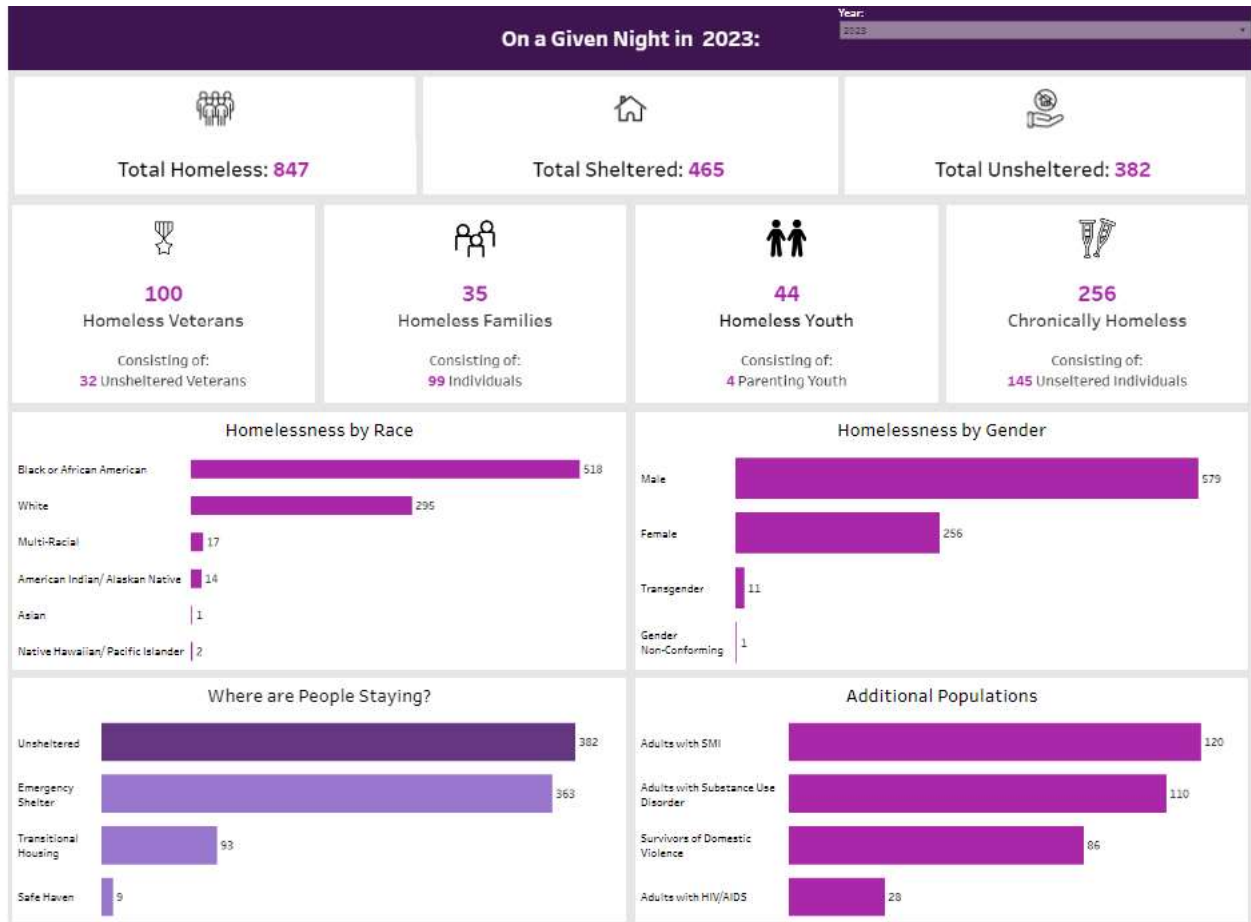
Extremely low-income households are defined as households earning 30 percent or less of area median income (AMI); very-low income households earn 50 percent or less of AMI; low-income households earn 80 percent or less of AMI; and median income households earn 100 percent of AMI.

Source: U.S. Department of Housing and Urban Development

The data analysis in this Allocation Plan will focus on extremely-low income households, with annual incomes of up to 30% AMI.



Point-In-Time Count 2023 Table



Source: <https://www.oneroofonline.org/point-in-time-count>

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

QP1: People Experiencing Homelessness as defined in 24 CFR 91.5

Population Experiencing Homelessness:

Per Point-in-Time (PIT) data collected in January 2023, the total number of homeless persons was 847 and they were in 758 distinct households. Of these 847 persons, 465 were sheltered (ES and TH) and 382 were unsheltered. These numbers indicate an overall drop in homeless numbers from the February 2022 PIT which identified a total of 601 sheltered persons, a decrease of 136 sheltered persons. However, the 2022 unsheltered count was 342 persons meaning that there was an increase of 40 people identified on the streets or in places unfit for habitation from February 2022 to January 2023.

2023 Point-in-Time included 32 sheltered youth and 12 unsheltered youth, consisting of 4 parenting youth. This indicates there was an increase in homeless youth in the City of Birmingham over the past year. Even more alarming, the number of unsheltered youth more than doubled from 2022. It should also be noted that the CoC, while working in the most recent NOFO scoring and ranking process, identified at least 4 youth in programs who are chronically homeless. This is the first time that chronically homeless youth have been recognized in Birmingham.

2023 Point-in-time identified that at least 145 of the 382 unsheltered people are Chronically Homeless, plus there are another 111 sheltered chronically homeless persons to make a total of 256 measurably chronically homeless people. While this is a total measured decrease of 11 people, this is not statistically significant since the unsheltered 2023 number was 36 individuals higher than in 2022, a 25% increase.

The total number of 2023 PIT Veterans is 100 with only 32 of those identified as Unsheltered. This is an overall decrease from the 124 Veterans identified in 2022.

Remembering that PIT information is self-reported, it is significant that of the 382 unsheltered individuals, 120 self-identified as having at least one Serious Mental Illness; 110 claimed Substance Use Disorder; and 28 self-disclosed a positive HIV/ AIDS diagnosis.

The racial and ethnicity breakdown of persons in homelessness is fairly reflective of the City's population. The 2023 PIT identified 518 persons who identify as Black, 295 who identify as White, 17 who identify as multi-racial, and then 14 Indigenous persons, 1 Asian and 2 Pacific Islanders. There were 25 people identifying as Hispanic and 822 saying they are non-Hispanic.

Point-in-Time 2023 identified 256 females and 579 males plus 12 individuals that self-identified as non-binary or Transgender. This reflects a 6% increase in the percentage of men over the last 7 years and a decrease of 8% in the percentage of women in that same time frame.

Point-in-Time 2023 totals do include data from other geographies, but unsheltered homeless people surveyed in the additional geographies numbered fewer than 10 individuals and no families. Therefore, Birmingham is comfortable that PIT numbers submitted here are not overestimations.

QP2: *At Risk of Homelessness as defined in 24 CFR 91.5:*

As reported in the 2015–2019 Comprehensive Housing Affordability Strategy (CHAS), 35% of City of Birmingham renters have a household income less than or equal to 30% AMI. Of the 35% Extremely-Low Income (ELI) renter households are experiencing the highest rent burden. Over 70% of ELI renter households pay more than 30% of their income towards rent. High rent burden on ELI renter households coupled along with severe housing



problems is essentially a measure of proxy of a non-income household living in inhabitable conditions and considered at risk of homelessness.

Comprehensive Housing Affordability Strategy ("CHAS") data

Summary Level: City Created on: October 18, 2022
 Data for: Birmingham city, Alabama Year Selected: 2015-2019 ACS

Income Distribution Overview	Owner	Renter	Total
Household Income less-than or= 30% HAMFI	6,125	17,685	23,810
Household Income >30% to less-than or= 50% HAMFI	5,865	8,915	14,780
Household Income >50% to less-than or= 80% HAMFI	7,155	9,955	17,110
Household Income >80% to less-than or=100% HAMFI	4,425	3,970	8,395
Household Income >100% HAMFI	17,205	9,570	26,775
Total	40,775	50,095	90,865

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	12,900	10,230	17,685
Household Income >30% to less-than or= 50% HAMFI	6,230	1,730	8,915
Household Income >50% to less-than or= 80% HAMFI	3,475	215	9,955
Household Income >80% to less-than or= 100% HAMFI	355	25	3,970
Household Income >100% HAMFI	245		9,570
Total	23,205	12,200	50,095

Source: <https://www.huduser.gov/portal/datasets/cp.html>

QP3: *Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice:*

There were 86 persons who claimed a history of Domestic Violence (DV) in the 2023 PIT, with 29 of them in Emergency Shelter, 14 in Transitional Housing plus there were 43 who were surveyed in Unsheltered locations.

The YWCA is one Birmingham’s largest service providers for fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, and stalking, or human trafficking victims responded to 2,255 calls on the 24-hour Crisis Line. They have provided nightly shelter for 17 homeless families at Interfaith Hospitality House. They have also provided safe nights for 200 adults & 103 children in 2 shelters.

The Crisis Center of Birmingham provides 24-hour Rape Response Hotline answered by trained staff of the Crisis Center and Rape Response program. Assistance is provided to adults, young adults, teens, seniors, sexual assault survivors, and those individuals in crisis. For Jefferson County, the State of Alabama recorded 3,736 instances of domestic violence abuse and there were 3 reported instances of rape.

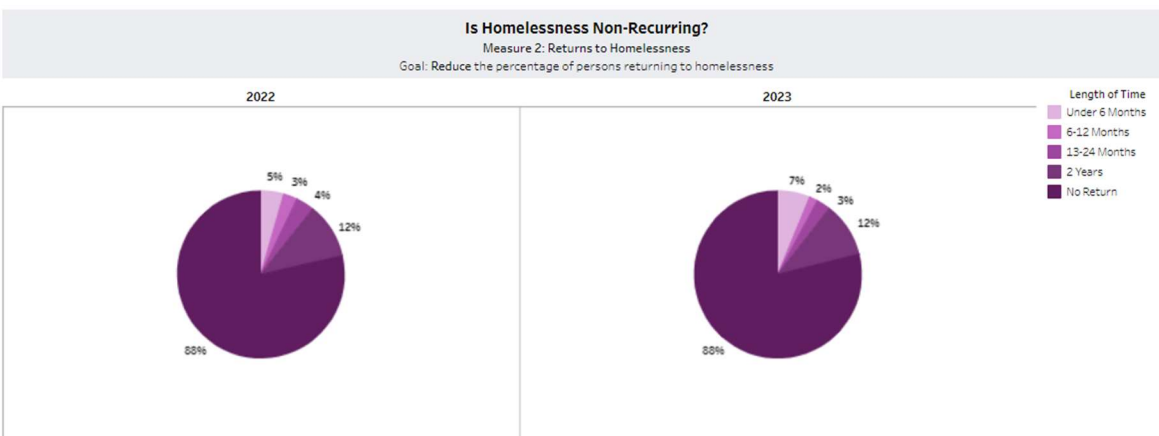
Nationally, from 2020-22, the top referral request in sex trafficking situations was for shelter or housing, according to National Human Trafficking Hotline data. The WellHouse is a national safe haven provider for female victims of human trafficking. They provide opportunities for restoration to female victims of human trafficking who have been sexually exploited through emergency, short-term, and long-term care programs. The WellHouse was founded in 2010 as a human trafficking shelter and resource center for women. Nationally, from 2021-22, WellHouse advocates served 85 women, 17 of them were children. “There are some commonalities that are true among the population of sex trafficking victims. Trafficking victims almost always are victims of childhood sexual abuse.” From 2021-22, advocates worked with 61 of the 85 residents reported sexually abused as a child, 34 experienced childhood emotional abuse and 17 were physically abused as a child, according to the WellHouse Restoration Report.; 26 women attended on-site Alcoholics Anonymous meetings, 12 women graduated from the program, 10 women found employment, and six moved to transitional housing.

In 2023, WellHouse Alabama took in 17 sex trafficking victims.

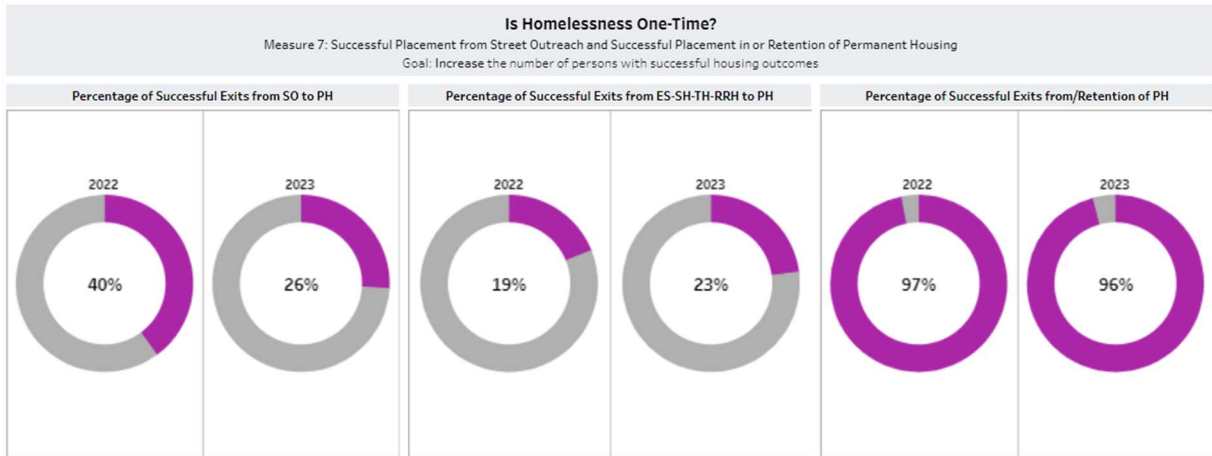
Domestic violence service providers consulted for this Plan indicated a need for more shelter options for those fleeing domestic violence.

QP4: Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice:

Other Families Requiring Services or Housing Assistance to Prevent Homelessness



According to 2023 data obtained by the CoC, in the Birmingham area approximately 88% of individuals receiving emergency shelter do not return to homelessness. However, 12% of individuals receiving emergency shelter are found to return to homelessness within 2 years.



According to the 2023 Housing Inventory Count (HIC) and PIT Count Reports, Alabama had 424 emergency shelter beds, this is down 7 beds from 2022. There were 110 transitional beds, down from 205 in 2022. According to the 2023 HIC & PIT there were 10 safe haven beds, down 14 beds from 2022. Additionally, there were 1,399 beds of Permanent Supportive Housing, 30 beds of Single Room Occupancy, and 77 Emergency Housing Vouchers reported in the 2023 Housing Inventory Count.

According to the 2023 HIC data, the total number of HUD-VASH Voucher beds for Jefferson County was 615.

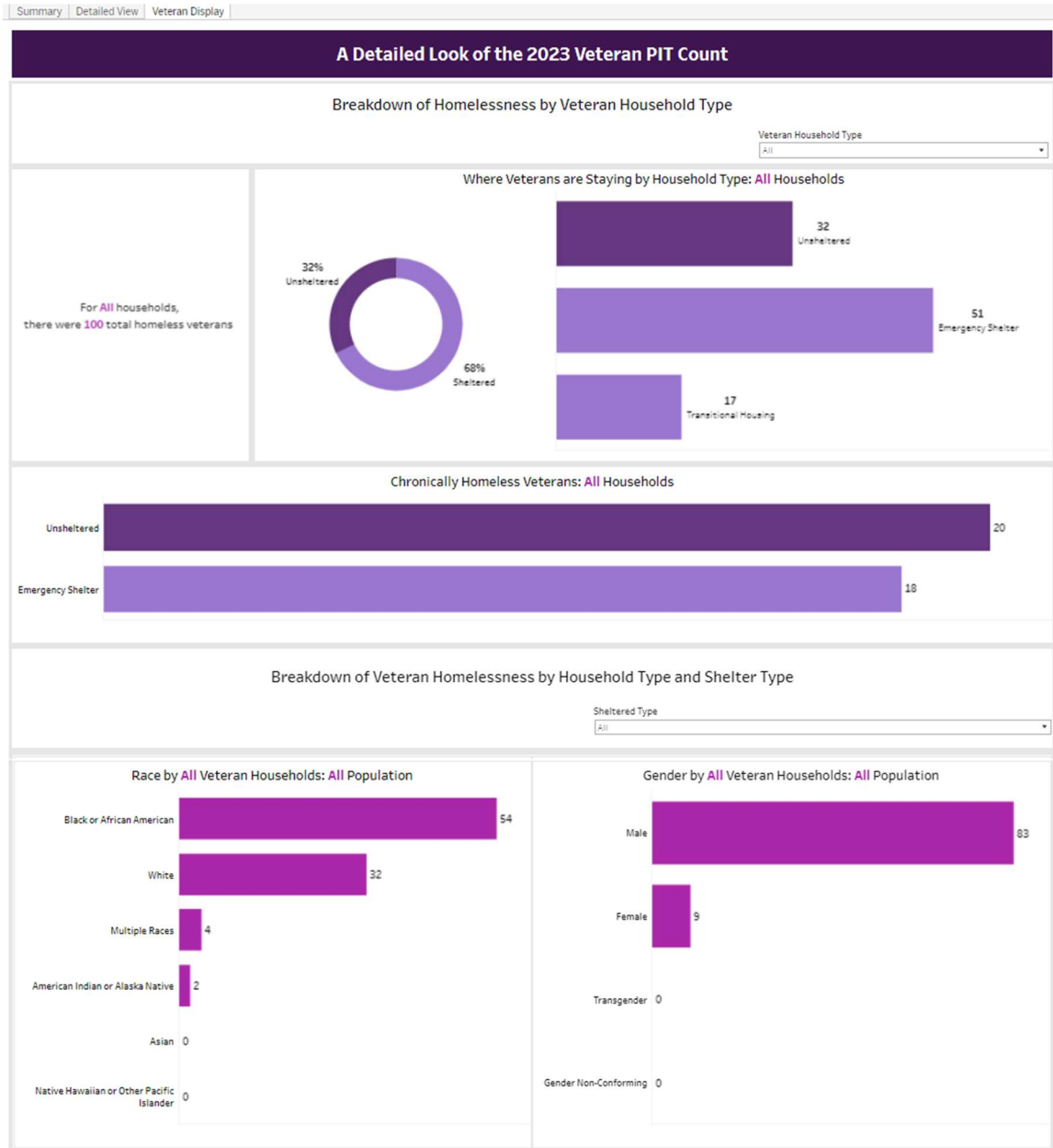
The U.S. Treasury Emergency Rental Assistance Program 1 and 2 (ERAP 1 and ERAP 2) have been closed out in the City of Birmingham. The City was able to serve approximately 9,844 households who were at risk for homelessness. Based on utilization of the program, 70% of ERAP was <30% AMI (6,883). 86% of ERAP was 50% AMI or lower (8,459).

Severely cost burdened households are those with housing expenses greater than 50% of their income and earning less than 50% of AMI. In the City of Birmingham, there are 26,600 renter households earning between 0-50% of AMI that are severely cost burdened or paying more than 50% of their income towards housing expenses.

The One Roof Continuum of Care has gathered, analyzed, and extracted data that supports prioritizing unstably housed persons with a history of homelessness. The CoC found that funds targeting unstably housed persons with a history of homelessness were significantly more likely to prevent a new incidence of homelessness than funds targeting unstably housed persons without a history of homelessness.

According to the Point-in-Time (PIT) Count estimates of homeless veterans at a point in time in January 2023 by the Continuum of Care (CoC) in the Birmingham area there are 100 homeless veterans, with only 68 of those veterans sheltered and 32 veterans are homeless without any shelter.

According to the PIT Count estimates of homeless youth at a point in time in January 2023 by the Continuum of Care (CoC) in the Birmingham area there were 44 homeless youth consisting of 4 parenting youth.



Source: <https://www.oneroofonline.org/point-in-time-count>



In reviewing the Housing Authority of the Birmingham District (HABD) waitlist numbers, there is a great need of subsidized housing for low and very low-income individuals. According to the waitlist, there are over 1,000 individuals awaiting Section 8 assistance and over 100 individuals awaiting public housing. Furthermore, there is a need for more affordable housing for the utilization of vouchers. Without the required affordable housing stock, those needing vouchers will not be able to secure affordable housing.

Unmet Housing and Service Needs

Describe the unmet housing and service needs of qualifying populations:

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

QPI: Homeless Populations, as defined in 24 CFR 91.5.

According to the Point-in-Time count from 2023, 847 persons were identified as homeless, with 465 (55%) of those persons sheltered. As indicated in the 2022 HIC (Housing Inventory Count), the Continuum of Care had 431 total year-round shelter beds for people experiencing homelessness. While this would appear to be sufficient beds to house those experiencing homelessness, some shelter beds are reserved for specific populations such as families, veterans, and those fleeing domestic violence. Further, shelters tend to be concentrated in specific areas so that needs are not met for all people experiencing homelessness. Furthermore, the type of shelter available is important.

A comparison of emergency shelter and transitional housing beds and family units totaled in the 2022 Housing Inventory Count to the 2023 Point-in-Time count reveals a shortfall in adult only shelter beds.

The availability of supportive services for these households as they transition into housing can greatly enhance the transition and help ensure that households retain their housing over time. In addition to these broad housing needs, there is a significant need for additional supportive housing inventory to meet the needs of chronically homeless adult households. COVID-19 placed unusual hardships on households leaving many in positions of past due rent/utilities, facing eviction and/or having to move. Between March 2021 – January 2022, 17,300 distressed household were assisted with the City’s Emergency Rental Assistance program.

Sheltered and unsheltered homeless persons need far more choices of safe, decent, accessible housing that is affordable at 0 – 30% AMI. At the time of this writing, the Coordinated Entry



Master List from which referrals are drawn, consists of 350+ families and individuals. The availability of supportive services does not meet the need for sheltered and unsheltered households to move from homeless to stability. Having services for these households as they transition into housing can greatly enhance the transition and help ensure that households retain their housing over time.

Homeless Needs Inventory and Gap Analysis				
Nightly Shelter Inventory	Family Beds	Family Units	Adult Only Beds	Veteran Beds
Emergency Shelter	79	27	345	90
Transitional Housing	42	16	163	12
Nightly Homeless Population	Individuals in Families	Family Households	Adults	Veterans
Sheltered	92	33	369	68
Unsheltered	7	2	375	32
Shelter Gap*	Family Beds**	Family Units	Adult Only Beds	Veteran Beds
Emergency Shelter & Transitional Housing Need	22	8	-236	2

*Shelter Gap calculations are sensitive to the categorization of shelter inventory by population served.

**Family Bed gap calculation assumes a 1-1 relationship between Family Beds and individuals in Families.

Note: Chart above does not include the 7 child-only shelter beds

QP2: At Risk of Homelessness, as defined in 24 CFR 91.5.

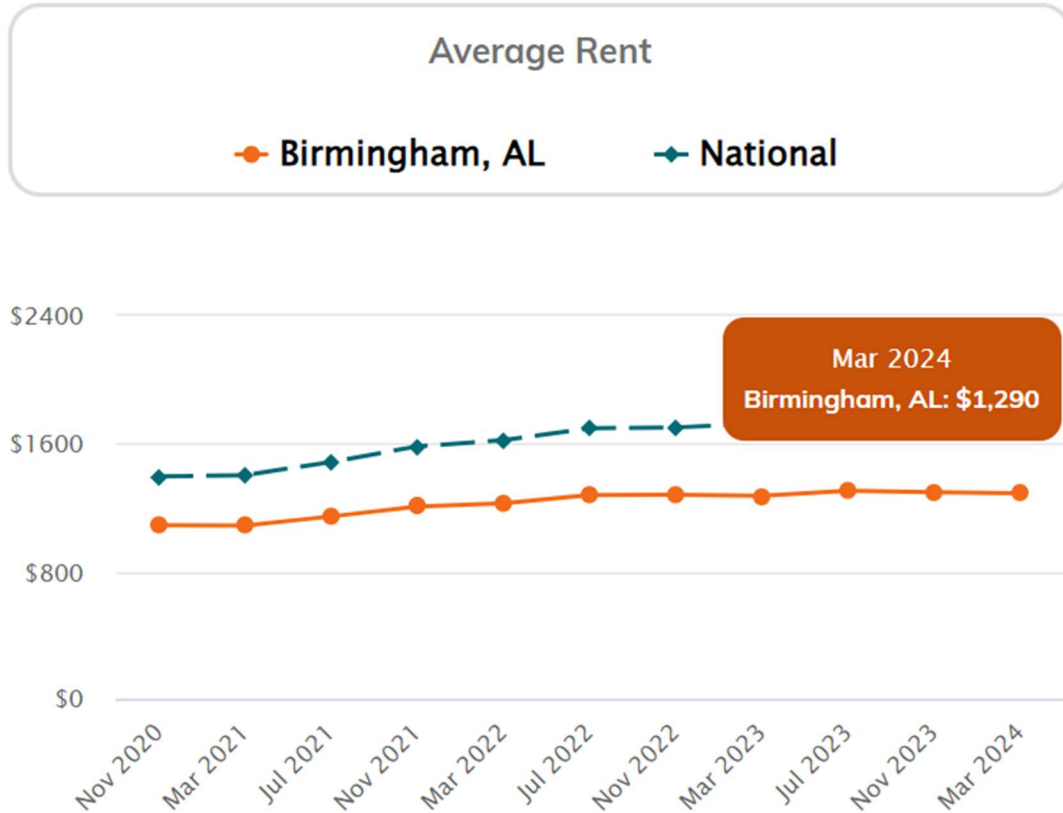
Households at risk of homelessness would most benefit from flexible funding targeted towards those who have a history of homelessness and housing options that are safe, decent, accessible and affordable at 0 – 30% AMI.

Cost burden and extreme cost burden are the most common housing problems for the City of Birmingham households earning less than 30% of AMI.

While costs of rents have continued to rise over the past five years, incomes of Birmingham residents have remained relatively the same. According to RentCafé, an online data source for rent and vacancy information nationally, the current average rent in the City of Birmingham is \$1,290 for a 967 sq. ft. unit.



Birmingham, AL rent trends



Source: <https://www.rentcafe.com/average-rent-market-trends/us/al/birmingham/>

Based on the 2022 national housing vacancy rates, the City of Birmingham ranks 8th in the country for vacancies. The City of Birmingham lost 7.7% of its residents between 2017 and 2022, with a trailing vacancy rate of 18.9%. In total, Birmingham reported 20,644 empty residences in 2022.

While this may seem like an opportunity to house some of the qualifying populations, it is important to consider the types of vacant units. The percentage of affordable units available in the City of Birmingham does not meet the needs of the residents. According to data obtained from the RentCafe, less than 25% of rental units in the City of Birmingham are affordable to residents who have a household income less than or equal to 30% AMI (See the graphic below).



Birmingham, AL apartment rent ranges



Source: <https://www.rentcafe.com/average-rent-market-trends/us/al/birmingham/>

QP3: Fleeing, Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, Or Human Trafficking, as defined in 24 CFR 5.2003

The 2023 Point-in-Time Report identified 86 homeless victims of domestic violence. Domestic violence or human trafficking survivors often lack easy access to short-term shelter and quick access to service providers for medical and mental health treatment and other services.

Services for those individuals and/or family units who are fleeing or attempting to flee domestic violence are provided through the YWCA. The YWCA Domestic Violence Services takes a holistic approach to empower victims and survivors. YWCA advocates provide safety planning, case management, information and referrals and legal advocacy. According to the Alabama Coalition Against Domestic Violence, domestic violence can happen to anyone. “Nearly one in three adult women experiences at least one physical assault by a partner during adulthood.” Crisis calls have been and continue to be processed by the YWCA, The Crisis Center, National Crisis Hotline, National Domestic Violence Hotline, and WellHouse. WellHouse seeks to educate the public on human trafficking and to provide restorative services to those who have been directly impacted by human trafficking. The United States was ranked one of the world’s worst places for human trafficking in 2018.



80% of victims are females and 50% are minors. From 2011-2019, federal human trafficking prosecutions increased by 79% in the United States. Justin Bowlin, a Jefferson County District Attorney's Office investigator, said he is seeing a rise locally in human trafficking cases both because the industry is profitable and because of the increase in awareness and resources for people to report.

Those fleeing domestic violence who use intervention services (e.g., counseling, information services, human resources, or employment assistance programs), and other workplace support services have a much better positive outcome, including a more positive outlook, greater drive to achieve their goals, better mental health, stronger workplace performance, and lower rates of absenteeism.

Further, experts generally concur that the programs and needs of children experiencing domestic violence have increased with the rising incidents of violence in families making their needs a heightened priority. Children need an environment with programs to address the trauma they have experienced.

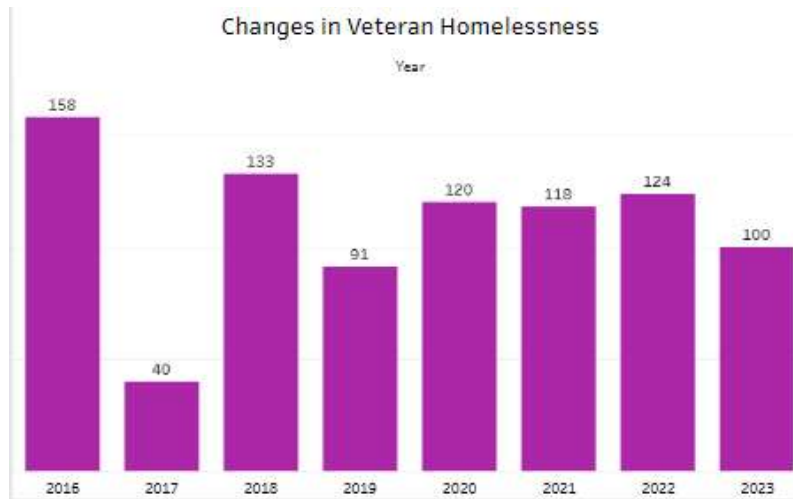
QP4: Other Qualifying Populations, Other Populations Requiring Services or Housing Assistance to Prevent Homelessness and Other Populations at Greatest Risk of Housing Instability, as defined by HUD

The issues already discussed in the previous sections for those at risk of homelessness, including cost burden, apply equally to those facing housing instability.

Veteran Housing and Supportive Services Needs across QPs

According to the City of Birmingham Point-in-Time Count from 2023, 100 homeless persons were veterans. The City of Birmingham consulted with the Department of Veterans Affairs to gather information regarding the veteran population. During the 2023 PIT Count, 32 unsheltered Veterans were counted, 51 Veterans who are currently sheltered were counted, and 17 Veterans were in transitional housing. There is a recorded decrease in the homeless Veteran population in the City of Birmingham. However, there are concerns about reoccurring homelessness and Veterans who may be at risk of homelessness.





Source: <https://www.oneroofonline.org/point-in-time-count>

The Birmingham VA’s Homeless Program Coordinator highlighted some areas of concern and potential sources of funding for Veteran services.

Recommendations for Funding Distribution	
<i>The Department of Veterans Affairs</i>	
Unhoused Needing to be Housed	
	Security Deposit
	Utility Deposit
	Landlord Incentive Fee (\$500)
	Application Fees
	Fees for Birth Certificates, Driver Licenses
	Bus Passes
	Emergency Hotel Stay Fees
Housed at Risk of Homelessness	
	Food Vouchers
	Gas Vouchers
	Rental Arrears
	Utility Arrears
	Cellphones
	Rental Insurance
	Moving Expenses
	Household Supplies
	Furniture
	Prevention Funds
	Delinquent Rental Payments
	Disconnected Utilities
	Assistance with Bedbugs Treatment

Source: This information was obtained via consultation with the VA.

There is a greater need for supportive services amongst the Veteran population than shelters. Supportive services are also needed to provide support to veterans currently homeless and at risk of homelessness.

Alethia House is a current service provider for the Veteran population. Alethia House is a community-based organization that provides employment training and job placement services for veterans experiencing homelessness. The organization was founded by a group of dedicated volunteers to address the needs of teens who were living on the streets in Birmingham. The services offered have evolved to include providing low-cost substance abuse treatment and prevention services to individuals, and the communities in which they live.

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

According to consultation with the CoC, the City of Birmingham, this Continuum, like many throughout the US, has seen major changes in the shelter and housing inventory over the past 3 – 5 years, some of those changes being directly related to the Pandemic and others attributable to the affordable housing crisis. The inventory of general communal emergency beds has decreased only slightly except during the height of COVID. The City of Birmingham did pivot and work collaboratively with the CoC lead agency, emergency shelters, the County, emergency shelter providers and others to open an emergency non-communal quarantine space which was successful. In the past, the City of Birmingham has not had an opportunity to adequately fund and implement the utilization of hotels/motels as non-congregate shelters due to a lack of financial and case management support. The CoC reports overdoses, damage to property, high rates of clients disappearing, and other distressing events that have resulted in zero hotel motel owners in a 5 – 7 mile radius of the City Center being willing to rent to any of our homeless services providers. Therefore, it would be imperative to provide wrap around services to any non-congregate shelter that is developed by converting hotels/motels.

While existing communal shelters have been retrofitted with social distancing in mind the CoC is anxious for alternatives as well, especially for our chronically homeless citizens who are not candidates for any type of communal program.

Non-communal emergency shelter is a gap. The Emergency shelter bed gap is 95 non-congregate beds for single adults, 25 units that are appropriate for couples, so that would be 50 beds but still 25 individual units.

The City of Birmingham and the CoC has expressed challenges when faced with housing large families of 6+ members, so there is a gap of 3 non-congregate family units able to house 6 – 8 members.

The Continuum lead agency has for several years expressed difficulty getting traditional DV providers to apply for new HUD funds that have been offered during the NOFO process. We know that they are now working with two grassroots DV providers including one specializing in LGBTQ+ services, an area that has never been served here, to increase their capacity to serve this vulnerable population. We are pleased that a comparable database has already been chosen



and that the Continuum is supportive of that choice of database. We look forward to increased continuum capacity to serve domestic and intimate partner violence since number of DV TH beds has decreased by half over the past 5 – 7 years.

We are overall concerned about the upcoming loss of two long-standing, important projects that serve very specific subpopulations and the gap that will be created in the continuum. The first is the closing of a 50 bed Transitional program that has been in place for more than 20 years which means of course that they still operate on the original funding, and that is simply no longer sustainable. For the last 8 – 9 years it has operated as a very low barrier program – Housing First at its best – even with having to continue with three men per apartment. Three men with many, many barriers that included lengthy felony histories, very short work histories, no credit histories, undiagnosed and denied mental illnesses and substance abuse issues, etc. The provider did apply for a Permanent Supportive Housing grant to help some of those men, but again, many of them deny any disability and are unable to find jobs that will sustain them after a Rapid Rehousing subsidy ended. The potential gap is large.

The second gap is the closing of a 24 bed Safe Haven program within that same agency. While this is a concern, the CoC has worked to mitigate negative effects as much as possible by funding a highly supportive medical/ PSH partnership that should house many of those seriously mentally ill men. Mental illness is prevalent here for many reasons, not the least of which is the fact that three of the few psychiatric facilities in the state are in our City, our County has the only licensed Boarding Homes and judges from all over the State send people with mental illnesses to our County to be housed and that is seldom successful. The CoC is monitoring the rate of reported mental illness carefully looking for increasing gaps.

At first glance it would seem that Permanent Supportive Housing/ Rapid Rehousing/ Other Permanent Housing is not a gap here since we had at least 159 empty units of housing at PIT 2022. Unfortunately, that is very misleading. At the same time that those units were empty, there were 200+ people on the CoC Master Waiting List. The Length of Time Homeless is increasing in this community, a statistic that is very distressing to the CoC, but it is easily trackable to the challenges in finding housing that will accept vouchers and subsidies, housing that is safe for vulnerable people, housing that meets minimum habitability standards, housing that is accessible for our clients with disabilities – or even just those who aren't disabled but who just can't climb the narrow rickety stairs of a slum apartment, and housing that is affordable. Permanent Housing is needed in this Continuum, and we need diverse answers to Permanent Housing. People with Lived Experience have requested fewer shared apartments, more free-standing housing, more SRO-type housing, more housing that is built around communities of other PLE's, and more housing that comes with services, services and more services.

Services leads us to the Unsheltered Community Planning Process that was done Fall 2022. More than 100 community members participated in the months-long process, a process that included focus groups of medical providers specializing in homelessness services, business and corporate people affected by unsheltered homelessness, municipal leaders serving neighborhoods affected by unsheltered homelessness, people with extended periods of incarceration and homelessness, and youth experiencing homelessness. Then there was a small group of five people with diverse current and past lived experience who gave hours upon hours of their time to



collate all of the gathered information and actually write the Community Plan. It is amazing how many of the suggested solutions were suggested by every one of the focus groups! It is also interesting that previous City Planning groups over the past 18 months have identified the same gaps and the same potential solutions.

Identify priority needs for qualifying populations:

The following priority needs have been identified for qualifying populations:

- Affordable housing units to address the severe lack of resources available to low-income, cost burdened households and vulnerable populations including people fleeing dangerous situations. (All QPs)
- Non-congregate shelter space that can accommodate adults and/or family household and their members. (QP1 and QP3)
- Supportive services for vulnerable populations that provide wrap around support, particularly to prevent housing instability and to meet basic human needs in a sustainable approach. The availability of supportive services for these households as they transition into housing or work to remain in housing can greatly enhance and help ensure that households retain their housing over time. (All QPs)
 - Supportive services needed include but are not limited to the following: employment assistance and job training, housing search and counseling services, legal services, life skills training, mental health services, outpatient health services, outreach, substance abuse treatment services, case management, services for special populations, financial assistance services. (All QPs)
 - Additional emphasis was noted for supportive services to support chronically homeless adult households to move into permanent supportive housing inventory. (QP1)
 - Another clear solution identified during stakeholder engagement are increasing supportive services for specific population that are impacted by homelessness such as 1) Single youth 2) youth families, and 3) family. (QP1)
- In addition to these broad housing needs, there is a significant need for additional supportive housing inventory to meet the needs of chronically homeless adult households.
- Providing funding support for transitional supportive housing facility will allow for an expansion of housing options and on-site services [(All QPs) (Date/time waitlist will be utilized)]

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

Gaps and needs were identified through extensive stakeholder engagement during fall and winter of 2021-2024. The City consulted with the One Roof, the local CoC serving the Birmingham 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, and the needs of persons with disabilities. Data were used to illustrate demographic trends and housing stability among the qualifying population. The data presented in this Allocation Plan is a compilation of data collected from ACS, CHAS, PIT Count, and other data sources that were cited.

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:

Pending HUD approval of its HOME-ARP allocation plan, the City of Birmingham will issue a Request for Proposals for interested and experienced developers of permanent supportive housing and/or affordable housing. The goal of the RFP will be to develop at least 15 units of permanent supportive housing. All funding awards will follow 2 CFR 200 procurement guidelines. The City will issue either Request for Proposals (RFPs), Request for Qualifications (RFQs), Notices of Funding Availability (NOFAs), or requests for Letters of Interest (LOIs) to select partner agencies. The City will encourage minority- and women-owned businesses (MBE/WBE), those leveraging Section 3 eligible workers, and Community Housing Development Organizations (CHDO) to apply. At the close of the application period, all applications will be reviewed for completeness, eligibility, and their ability to deliver the specified activity to the eligible qualifying populations listed in the City's HOME-ARP Allocation Plan. Proposals will be objectively scored by a qualified scoring committee. Awards will be approved by the appropriate authorized City official and the Birmingham City Council. Upon completion of the RFP process, a subrecipient will be selected to administer the program.

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

The City did not provide any funds to a subrecipient or contractor that would be responsible for the administration of its entire HOME-ARP grant.

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



Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 274,139		
Acquisition and Development of Non-Congregate Shelters	\$ 3,000,000		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 1,100,000		
Non-Profit Operating	\$ 0		
Non-Profit Capacity Building	\$ 0		
Administration and Planning	\$ 700,000.00		
Total HOME ARP Allocation	\$5,074,139.00		

Distribution of HOME-ARP funds in Accordance with Priority Needs

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

Supportive Services: The city will provide HOME-ARP funds for a broad range of supportive services to the qualifying individuals and families that meet HUD’s requirements. The eligible supportive services include (1) McKinney-Vento Supportive Services; (2) HOME-ARP Homelessness Prevention Services; and (3) Housing Counseling Services, except homeowner assistance and related services. Eligible costs associated with McKinney-Vento supportive services and homelessness prevention supportive services include: Costs of child care, Costs of improving knowledge and basic educational skills, Costs of establishing and/or operating employment assistance and job training programs, Costs of providing meals or groceries, Costs of assisting eligible program participants to locate, obtain and retain housing, Costs of certain legal services, Costs of teaching critical life management skills, Financial assistance costs, including, Rental application fees, Security deposits, Utility deposits, and Payment of rental arrears. Costs associated with housing counseling services include staff salaries and overhead costs of HUD-certified housing counseling agencies related to directly providing eligible housing counseling services to HOME-program participants. Other costs are the development of a housing counseling workplan, marketing and outreach, intake, financial and housing affordability analysis, action plans that outline what the housing counseling agency and the client will do to meet the client's housing goals and that address the client's housing problem(s).

Acquisition and Development of Non-Congregate Shelters: The city will use the HOME-ARP funds to acquire and develop non-congregate shelters for qualifying individuals and families according to the CPD Notice. The potential non-congregate shelters will provide private units or rooms as temporary shelter to individuals and families. The activities include the construction of new structures or the acquisition and/or rehabilitation of existing structures (such as motels, nursing homes, or other facilities) to be for use as HOME-ARP NCS. Eligible Costs are as follows (1) Acquisition Costs: Costs to acquire improved or unimproved real property for use as or development of non-congregate shelters; (2) Demolition Costs: Costs to demolish existing



structures to develop non-congregate shelters; (3) Development Hard Costs: Costs to rehabilitate or construct non-congregate shelters units, which are costs to make improvements to the project site, such as installation of utilities or utility connections, laundry facilities, community facilities, on-site management, or supportive service offices; (4) Related Soft Costs associated with financing, acquisition, and development of non-congregate shelters projects; and, (5) Replacement Reserve Costs to capitalize a replacement reserve to cover reasonable and necessary costs of replacing major systems and their components.

Development of Affordable Rental Housing: The City will use HOME-ARP funds to acquire, construct and rehabilitate rental housing for occupancy by individuals and families that meet one of the qualifying populations. HOME-ARP rental housing that will provide single family or multifamily housing, transitional or permanent housing, and housing with supportive services.

Administration and Planning: The city will use the HOME-ARP funds to pay reasonable administrative and planning costs of up to 15 percent of the HOME-ARP allocation. Some or a portion of the HOME-ARP administrative funds would be to subrecipients and contractors that are administering activities on the behalf of the city.

Rationale Funding Based on Characteristic Needs Identified in the Gap Analysis

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:

The analysis of the current inventory of housing available to persons who experience homelessness and who are at risk of homelessness shows that the current housing inventory is not sufficient to address the numbers of persons and families actually experiencing homelessness throughout the year. A total of 382 persons were unsheltered on the night of the PIT Count. A total of 256 persons were chronically homeless. Both emergency shelter beds and transitional housing beds were near capacity. Currently, the City does not have established recurring funds for the creation or renovation of non-congregate homeless service facilities. The large number of people experiencing homelessness and lack of funds for emergency shelter. This data shows that addressing the emergency shelter needs of homeless persons is of highest priority to combat persons having to sleep outside while experiencing homelessness. While permanent housing is the best solution to homelessness, emergency shelter is still an important safety net to help people move off the streets and into safer temporary quarters.

Data shows the need for more affordable housing units has been intensifying over recent years as cost burden among renters becomes more severe in a market with continually increasing rent prices. Further, units with more affordable costs are often located further from amenities and employment, shifting the rent cost burden to higher burdens around transportation, commute times, and access to opportunities. More affordable units are needed in locations where residents can find employment and access food, health care, and schools. The City of Birmingham intends to use HOME-ARP funds to assist in the development of affordable rental units where these



funds can be leveraged with other resources to enhance the impact of the HOME-ARP allocation.

Stakeholders also noted that, for the most vulnerable populations, maintaining housing stability is difficult without supportive services. Providing services that can support households in meeting basic needs and accessing mental and physical care fosters long term stability and success, especially for those transitioning out of difficult situations or facing potential homelessness. Many stakeholders noted the importance of assisting people with services that keep them housed in the current rental market. Those who find themselves unhoused may find it impossible to secure new housing due to rising rents and increased barriers to entry through requirements like high security deposits, eviction background checks, and rent to income ratios.

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 City anticipates addressing the most urgent need for more affordable housing units by using \$1,100,000 in HOME-ARP funding along with additional HUD federal funding such as CDBG funding to produce or support up to 15 affordable rental housing units.

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

The goal would be to provide individual or family affordable housing units which would be available to all QPs. The need for affordable housing was the number one ranked need identified in consultation with stakeholders and citizens. The City has received more applications for the 4% tax credit which are more costly and do not require targeting for households earning 30% of AMI. Therefore, the current market and housing costs does not yield a very high rate of return on affordable units produced per dollar of subsidy. However, increasing the affordable housing supply is certainly a major need in combating homelessness.



Preferences

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

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

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

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

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.



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

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

In an effort to provide maximum program flexibility and opportunities to all City residents experiencing or at-risk of homelessness, the City has elected to not apply preferences among the Qualifying Populations for the entire HOME-ARP allocation.

Instead the City of Birmingham has determined that it will give a preference for one HOME-ARP funded activity, the acquisition and development of non-congregate shelters, shown below. This preference is for those with people defined as QP1: homelessness.

Use of HOME-ARP Funding	Preference of Qualifying Population
Acquisition and Development of Non-Congregate Shelters	QP1: Homeless

The establishment of the preference herein complies with all applicable fair housing, civil rights, and nondiscrimination requirements, (e.g., Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD’s Equal Access Rule, and Americans with Disabilities Act). **The City of Birmingham will not establish limitations on eligibility for a HOME-ARP project or activity.**

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

The preference will allow people with no housing to obtain shelter prior to other populations that may be precariously housed. A non-congregate shelter gap was identified during Covid pandemic, was part of stakeholder feedback on QP1 needs and was supported by gaps data. Providing non-congregate shelter will also help reduce the number of people experiencing unsheltered homelessness to receive assistance in an environment that feels more accessible than traditional shelter model.



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:

The City has elected to not use its HOME-ARP funds to refinance existing debt secured by multifamily rental housing.

