



HOME Investment Partnerships American Rescue Plan Program



HOME-ARP Allocation Plan

November 2022

Clark County HOME-ARP Allocation Plan

Participating Jurisdiction: Clark County, Washington

Date: November 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. Local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

Clark County consulted stakeholders by requesting feedback by online survey on the prioritization of eligible activities and qualifying populations. A preliminary draft needs assessment was included with the survey to solicit feedback from providers who work with these populations. A draft of the HOME-ARP Allocation Plan was also emailed to stakeholders for review and input. Stakeholders include a variety of homeless and social service providers in Clark County as well as housing developers, Veteran organizations and By and For agencies that serve disadvantaged populations. Over 400 stakeholders were invited to comment on the development and content of the plan. The organizations listed below are only a few of the organizations consulted. The initial survey and request for feedback was sent to these stakeholders in Winter 2022, before the Allocation Plan was developed. After the plan was drafted these stakeholders were contacted again for comments and feedback.

In addition to the survey and email requests for comment, County staff had additional phone and video call meetings with some of the providers to discuss service gaps, potential projects to fund and processes for prioritizing households for HOME-ARP funding. Meetings of the Urban County Policy Board and Veterans Advisory Board also informed this Allocation Plan.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Vancouver Housing Authority	Public housing authority	Survey, emails, meeting	Contributed information to needs assessment, project ideas
Council for the Homeless	CoC Convener	Survey, emails, video meeting, phone call	Contributed information to needs assessment, project ideas, qualifying populations and preferences

Share	Homeless service provider	Survey	See attached survey responses
YWCA Clark County	Domestic violence shelter	Survey, project proposal	Needs assessment; See attached survey responses
Janus Youth	Homeless service provider for youth	Survey	See attached survey responses
Cities of Camas, Washougal, Battle Ground, Ridgefield, LaCenter, Yacolt, and Woodland	Clark County small cities	Participation in Urban County Policy Board	Made HOME-ARP funding recommendations
Clark County Public Health	County department	Survey	See attached survey responses
ESD112	School District	Survey	See attached survey responses
Hispanic Metropolitan Chamber	Small business assistance	Survey	See attached survey responses
Clark County Veterans Assistance Center	Veterans service provider	Survey and consistent, ongoing in-person discussions about Veteran needs	Veteran housing needs, needs of homeless veterans
CDM Caregiving Services	In-home care provider for elderly and disabled	Survey	See attached survey responses
Columbia River Mental Health	Mental health services	Survey	See attached survey responses
NAACP Vancouver; Latino Community Resource Group; Clark County Volunteer Lawyers Program	Civil rights, fair housing, legal advocacy for underserved populations	Survey	See attached survey responses

The stakeholder consultation survey was sent to 400+ stakeholders representing a broad variety of local organizations. The above is a small selection of the organizations consulted. 46 responses were received.

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 and 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:

Clark County initially advertised the availability of HOME-ARP funding in conjunction with the 2022 CDBG and HOME Annual Action Plan process. The Urban County Policy Board reviewed applications and made funding recommendations in spring 2022. The HOME-ARP Allocation Plan was released for public comment period in October 2022, with a public hearing scheduled November 1, 2022, prior to submission in HUD's IDIS system as an attachment to the 2021 approved Action Plan.

Public comment period: October 21, 2022 to November 10, 2022

Public hearing: November 1, 2022

Describe any efforts to broaden public participation:

The public hearing was advertised in the local newspaper, the Columbian. Clark County also advertised the HOME-ARP Allocation Plan through the County's social media accounts, Facebook and Twitter. The draft plan was sent out to a diverse stakeholder list, representing a wide spectrum of service-providers and community members to advertise the public hearing and request public comments.

In addition to the Clark County Council meeting, the Urban County Policy Board discussed the allocation of HOME-ARP funding in two public meetings. All Council and Advisory Board meetings were open to the public and were accessible by virtual participation. The Council meeting and public hearing were also in-person. Audio and visual accommodations were made available for all meetings. County Council meetings are also broadcast on local access television (CVTV).

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:

No public comments were received.

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

No public comments were received.

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.

Size and demographic composition of qualifying populations within Clark County

Qualifying Population #1: Homeless as defined in 24 CFR 91.5: lacking a fixed, regular, adequate nighttime residence such as emergency shelter, exiting an institution or someplace not designed for people to live. Households are also considered to be homeless if they will imminently lose their housing and have no other housing or support networks. Youth under age 25 are considered homeless if they are considered homeless in another federal act or have had no housing or unstable housing in the past 60 days and can be expected to continue in such status for an extended period of time because of history or conditions.

The share of people experiencing homelessness has increased since 2017, and many of those residents remain unsheltered.

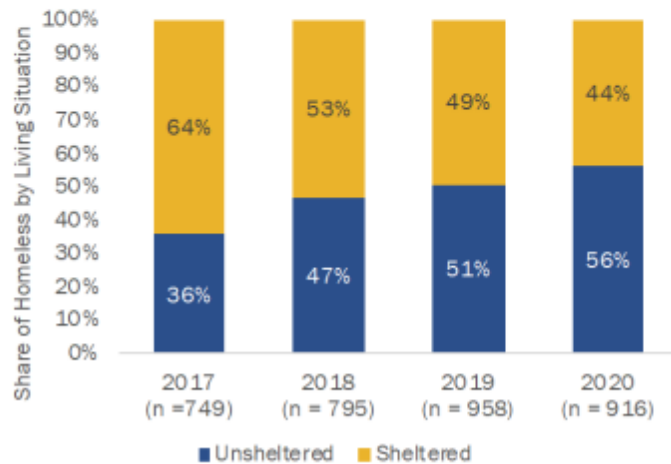
In 2020, 916 people experienced homelessness in Clark County—an increase of 167 people from 2017 (or a 22% change).

In 2020, 516 people experienced homelessness and were unsheltered—an increase of 247 people from 2017 (or a 92% change).

Exhibit 10. Homelessness Estimate (Sheltered and Unsheltered), Clark County, 2017 through 2020

Source: Council for the Homeless, PIT Estimates. Clark County 2019-2022 Homeless System Action Plan, PIT Estimates.

Note: N = total number of persons experiencing homelessness.



The table above is from Clark County’s Housing Inventory and Analysis for the Clark County Unincorporated Vancouver Urban Growth Area and shows how unsheltered homelessness has steadily increased over time.

The Council for the Homeless reports that of the 916 people experiencing homelessness in 2020, 45% were women, 55% were men and 24% were people of color. The Council also reports that 197 of these households (or 21%) were chronically homeless and 64 (or 7%) were survivors of domestic abuse.

Additional demographic information from the 2020 Point in Time count shows:

- 120 families with children
- 41 young adults (ages 18-24)
- 8 unaccompanied minors (under 18)
- 61 seniors (62 and over)
- 54 Veterans

Qualifying Population #2: At risk of Homelessness, as defined in 24 CFR 91.5: households with an annual income below 30% of median family income that do not have sufficient resources or support networks; and has moved more than 2 times in 60 days; living with someone else because of economic hardship; current housing will end in 21 days; lives in a hotel or motel not paid by charitable or government programs; lives in overcrowded housing or is exiting an institution or system of care.

HUD provides housing numbers for the county (including the City of Vancouver), compiled from the Census, called Comprehensive Housing Affordability Strategy (CHAS) data for use in planning. The most recent numbers are from 2014-2018:

Income by Cost Burden (Owners and Renters)	Cost burden > 30%	Cost burden > 50%	Total
Household Income <= 30% HAMFI	11,240	9,570	14,775
Household Income >30 to <=50% HAMFI	13,010	6,755	17,095
Household Income >50 to <=80% HAMFI	14,610	2,990	28,130
Household Income >80 to <=100% HAMFI	5,765	685	18,930
Household Income >100% HAMFI	5,545	555	92,595
Total	50,170	20,560	171,520

Although it is unknown whether these households have access to sufficient support networks or have moved recently, data shows that there are 11,240 households in Clark County, with extremely low-income, who are cost burdened by their housing, meaning they spend more than 30% of their income toward housing costs. In fact, 9,570 of these households must pay more than 50% of their income to remain in their housing.

The CHAS data also provides information by household income showing housing problems. Housing problems defined by HUD include: incomplete kitchen, incomplete plumbing, more than 1 person per room; or cost burden greater than 30%.

Income by Housing Problems (Owners and Renters)	Household has at least 1 Housing Problem	Household has no Housing Problems (OR cost burden not available)	Total
Household Income <= 30% HAMFI	11,455	3,320	14,775
Household Income >30 to <=50% HAMFI	13,160	3,940	17,095
Household Income >50 to <=80% HAMFI	15,490	12,640	28,130
Household Income >80 to <=100% HAMFI	6,520	12,415	18,930
Household Income >100% HAMFI	7,380	85,215	92,595
Total	53,995	117,525	171,520

This table shows that from 2014-2018, 11,455 households in Clark County earn less than 30% of area median income and have a housing problem that could put them at higher risk for homelessness.

Qualifying Population #3: Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD.

For HOME-ARP, this population includes any household that is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. Domestic violence, dating violence, sexual assault, and stalking are defined in 24 CFR 5.2003. Human Trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000.

The following map from the Council for the Homeless indicates the number of people who lost their housing in Clark County in 2021. Domestic Violence was one of the top reasons for homelessness in 2021, with 338 households reporting that as the cause for losing their housing. The 2022 Clark County Point in Time Count identified 51 survivors of domestic violence who were currently homeless. Additionally, there are many more individuals and families experiencing domestic violence and in need of housing who would not be counted as homeless because they have not fled their abusive environment. These individuals are in need of housing assistance to make the transition out of their current unsafe housing. Service providers like the YWCA can work with survivors throughout this process to transition them directly into new housing.

There are an estimated 3.49 victims of human trafficking for every 100,000 people in the State of Washington. This would translate to roughly 18 victims in Clark County, although this number is probably higher given Clark County’s location between Portland and Seattle along the Interstate 5 corridor, an area known to have particularly high instances of human trafficking.

In preparation of this Allocation Plan, County staff reviewed a variety of statistics on domestic violence, sexual assault, and stalking, in Clark County and the wider population. We were unable to disaggregate repeated victimization of the same individuals or households from crime reports (it is known that approximately 80% of women victims of domestic violence have previously been victimized by the same partner), or to determine how many victims attempted to flee in a given year or were

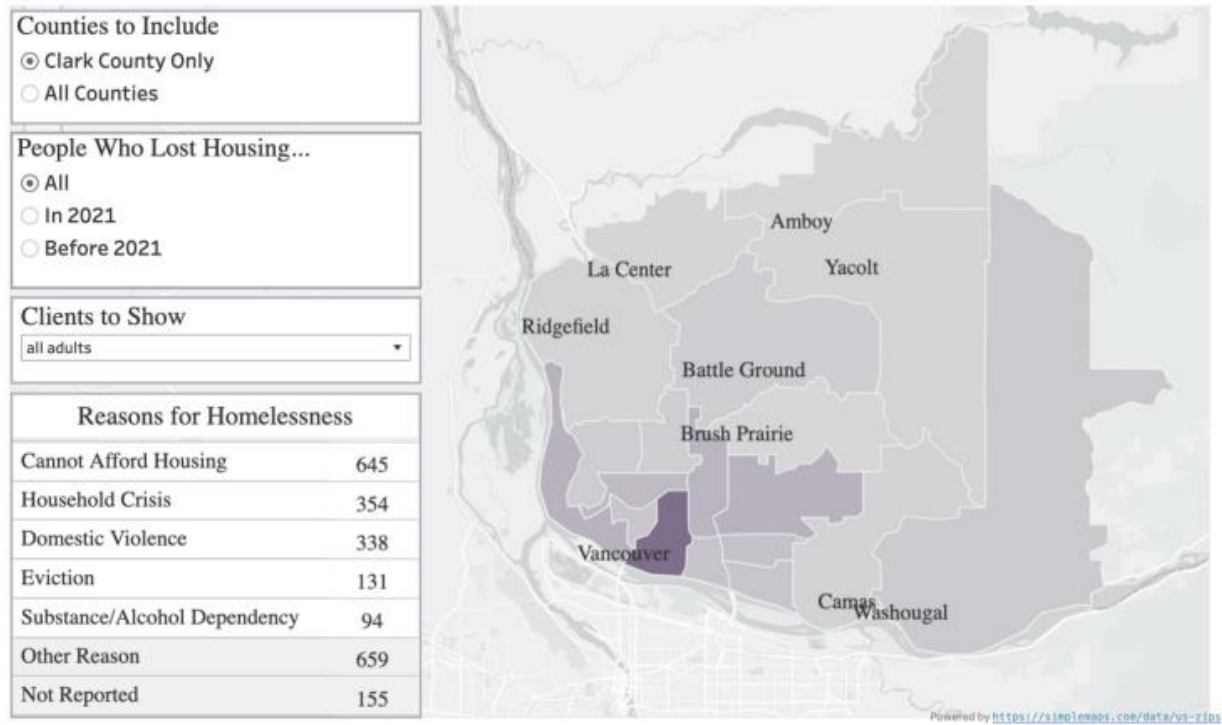
displaced as a result of their victimization. However, we know that in a single year there were over 3000 law enforcement service calls for domestic violence, and 80 reported rapes in Clark County. While we were unable to develop a single estimate for the number of people comprising Qualifying Population #3, it is clear that domestic and sexual violence, trafficking and stalking are significant issues in the County. With just 10 emergency shelter beds and 16 rapid rehousing beds dedicated specifically to these survivors, our community is nowhere close to meeting the housing needs of this qualifying population.

Rapid rehousing is an extremely high need for individuals and families who have fled and are experiencing homelessness to prevent survivors from returning to unsafe environments. Survivors need supportive services like housing case management, safety planning and other advocacy programming associated with their housing assistance. PTSD, depression and anxiety are very frequently present among this population. There are two organizations which provide domestic violence-related services within Clark County: YWCA SafeChoice and the Cowlitz Indian Tribe Pathways to Healing program. Clark County also has a Human Trafficking Taskforce coordinating the community response to trafficking, including educating and training service providers to identify and work with this population.

2021 Zip Code Interactive Map

People who access services through the homelessness crisis response system in Clark County are given the option to provide their last permanent zip code and the primary reason they lost their housing. This information is entered into HMIS, a secure database, and can be used to identify regional patterns.

This map is shaded from purple to green. Zip codes shown in purple saw more people losing their housing than expected, while zip codes shown in green saw fewer. Select a client population from the menu on the left or hover over a zip code for more information.



All local data from Clark County, WA HMIS

Qualifying Population #4: Other Populations where providing supportive services or assistance would prevent the family’s homelessness or serve those with the greatest risk of housing instability.

If a household does not qualify under one of the above populations, they may still be assisted if they: have previously been homeless, are currently housed due to temporary assistance and need additional assistance to stay housed; or earn at or below 30% of AMI and are severely cost burdened, OR have income at or below 50% AMI, and meet one of the conditions of “At risk.” Veterans and Families that meet the criteria for one of the qualifying populations described above are also eligible to receive HOME-ARP assistance.

Approximately 24% of renters in the unincorporated Vancouver urban growth area are severely cost burdened (44% are cost burdened). 23% of homeowners are cost burdened. HUD Comprehensive Housing Affordability Strategy data identified 9,570 households earning below 30% AMI and spending greater than 50% of their income on rent.

There are estimated to be 32,577 Veterans living in Clark County. Clark County has a Veteran By Name List (VBNL) workgroup that meets monthly to case conference Veterans who are homeless and coordinate outreach from Veteran service providers. There were 83 Veterans on average who were active on the VBNL in the last 12 months. Clark County has a history of strong support for Veterans with a Portland-VA medical campus that includes two Veteran housing developments, and the Clark County Veterans Assistance Center (CCVAC), that serves Veterans with a range of needs, including housing. The Clark County Veterans Assistance Fund funds housing and homelessness services at the CCVAC.

The following tables from the Clark County 2020 Community Needs Assessment (data from US Census) provide additional information about the most economically vulnerable populations in Clark County to whom housing services may prevent housing instability and homelessness. Youth experience the highest rates of poverty in Clark County. People of color experience disproportionately high rates of poverty compared to white residents of Clark County.

Population by Gender

Report area	Male	Female	Percent Male	Percent Female
Clark County, WA total population	231,128	237,531	49.3	50.7
Clark County, WA below poverty	19,018	24,366	8.2	10.3

Population by Age

Report area	Age 0-4	Age 5-17	Age 18-35	Age 35-64	Age 65 and over
Clark County, WA total population	6.1%	17.9%	21.2%	39.7%	15%
Clark County, WA below poverty	13.3%	11.2%	11.4%	7.3%	7.2%

Population by Race

Report area	White	Black	Asian	American Indian Alaska Native	Native Hawaiian Pacific Islander	Other Race	Multiple Races
Clark County, WA total population	84.7%	1.7%	4.6%	0.6%	0.8%	2.6%	5.0%
Clark County, WA below poverty	8.65%	14.85%	11.0%	11.4%	19.9%	15.2%	12.5%

Population by Ethnicity

Report area	Total	Number Hispanic or @Latin	Percent Hispanic or Latin@	Non-Hispanic or non-Latin@	Percent non-Hispanic or Latin@
Clark County, WA total population	468,659	44,891	9.6%	368,406	78.6%
Clark County, WA below poverty	43,384	7,215	16.1%	29,186	7.9%

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 to prevent homelessness; and,**
- **Those at greatest risk of housing instability or in unstable housing situations:**

The Point In Time Count from 2020, indicated the following needs in Clark County:

INCREASE SHELTER BEDS: The Clark County Homeless Action Plan identifies a need for nearly 100 new 24/7, year-round shelter beds, including those for people with high health needs, youth and domestic violence survivors.

INCREASE RENT ASSISTANCE AND SUPPORTIVE SERVICES: The community must fund additional permanent housing programs that provide rent assistance and supportive services (Rapid Re-housing and Permanent Supportive Housing).

- Rapid Re-housing is designed to help people exit homelessness quickly and return to permanent housing by providing three core activities including housing identification, limited financial assistance and housing-based supportive services. Due to the lack of affordable housing in our community, many households need longer-term rental assistance and support.
- Permanent Supportive Housing (PSH) programs are linked with services that help residents maintain housing and improve their quality of life. People in PSH have been shown to reduce their dependence on systems of care and access behavioral/physical health supports.

CREATE SHARED HOUSING OPPORTUNITIES: With an increase in the number of youth, seniors and domestic violence survivors experiencing homelessness, shared housing can offer stable housing in untraditional and affordable ways. A program focused on seniors experiencing homelessness should be funded with a focus on outcomes versus outputs, recognizing long-term stability is more important than the number of matches. Host home programs focused on youth age 24 and younger should be explored and opportunities to support DV survivors with shared housing should be created.

EXPAND AND ENHANCE STREET OUTREACH: Outreach staff are often the only connection to high-risk persons living unsheltered. Health care professionals in partnership with outreach staff and people with lived experience of homelessness, must be deployed as “Street Medicine Teams.” These teams can assess, treat, and educate patients, and provide follow-up evaluation and care as needed.

AFFORDABLE HOUSING FOR PEOPLE WITH EXTREMELY LOW-INCOME: Clark County must dedicate itself to increasing the supply of housing and creating new housing opportunities for people with diverse incomes. This includes people who have zero income, those who rely on the Aged, Blind and Disabled (ABD) program, and those who receive social security.

Identify and consider current resources available to assist qualifying populations, including shelter, supportive services, TBRA, and affordable and permanent supportive housing

The following tables are from the Clark County Housing Inventory Chart published by the Council for the Homeless on February 24, 2022.

Emergency Shelter: Non-permanent congregate beds or rooms where a household can reside. Supportive services are provided and focus on meeting the basic needs of the residents and addressing barriers to moving into permanent housing.

Agency Name	Shelter Name	Beds	Population
Catholic Community Services of Southwest Washington	Bertha Cain Baugh Place (<i>non-congregate; opened 2022</i>)	85	Single Women and Couples 55 years +
Catholic Community Services of Southwest Washington	Bertha's Too (<i>non-congregate; opened 2022</i>)	32	Single Women and Couples 55 years +
Family Promise	Family Promise	14	Families
Janus Youth	Oak Bridge Youth Shelter	5	Youth under 18
Outsiders Inn	St. Paul & WHO St. Paul	30	Single Men
Outsiders Inn	The Outpost Community	23	Singles and Couples
Share	Share - WHAT	18	Single Women
Share	Homestead	63	Families & Four Single Women
Share	Share House	30	Single Men
Share	Orchards Inn	58	Families & Four Single Women
YWCA	Clark County Safe Choice	10	DV Survivors (Singles/Families)
Total Beds		368	

Temporary/Severe Weather Emergency Shelter: Time limited congregate beds or motel space where households can reside overnight, especially during winter and severe weather.

Agency Name	Shelter Name	Beds	Population Type
Council for the Homeless	Motel Vouchers	25	All populations
Janus Youth – Ascend	Motel Vouchers	7	Youth-headed 18 – 24
Janus Youth	Hotel Vouchers	3	Youth-headed 18 – 24
Living Hope Church	Severe Weather Shelter	29	All populations
Outsiders Inn	Satellite Overflow Shelter	19	All populations
WHO – St. Andrew	WHO – St. Andrew	36	Single Women, Couples, Families
Total Vouchers/Beds		35/84	

Transitional Housing: Time limited site-based housing paired with supportive services for people with low to medium vulnerability. Household must exit the housing once program ends.

Agency Name	Program Name	Beds	Population Type
Janus Youth	Caples Terrace	39	Youth 18 – 24
Open House Ministries	Open House Shelter & Annex	59	Families and single women
Open House Ministries	Pinewood Terrace	34	Families
Second Step Housing	CF Transitional Housing	7	Families, singles, couples
Share	Resident Transitional	20	Single adults
Xchange Church	Transitional Housing	28	Singles and couples
Total Beds		187	

Rapid Re-housing: Time limited rent assistance in scattered site units paired with supportive services for people with medium to high vulnerability. Household can remain in housing once program ends.

Agency Name	Program Name	Units	Population Type
Cowlitz Tribal Health	Cowlitz Tribe - RRH	11	Tribal Member
Impact NW	Impact NW - RRH	11	All Populations
Janus Youth	Janus Nest 2 – City/County	44	Youth (18-24)
Lifeline Connections	Lifeline TBRA/COV RRH AHF	5	All Population
Salvation Army	TSA - COV RRH AHF	35	All Populations
Share	ASPIRE HOME/ESG/Pros	108	All Populations
Share	Share HEN RRH	121	People with a disability
YWCA	ESG-CV RRH	16	Survivors of DV
Total Units		351	

Permanent Supportive Housing: Permanent affordable housing with intensive supports for people who are most vulnerable in the community.

Agency Name	Program Name	Type	Units	Population Type
Comm Services NW	CSNW PSH NW, NW II, Way Home, Way Home 3	Scattered	38	Singles/Couples
Housing Initiative, LLC	The Pacific	Site-based	18	Singles/Couples
Housing Initiative, LLC	Elwood	Site-based	44	Singles/Couples
Impact NW	Impact NW – PSH/local	Scattered	17	Singles/Couples
Janus Youth	Janus Connections	Scattered	6	Youth (18-24)
Lifeline Connections	Lifeline PSH Local	Scattered	11	Singles/Couples
Share	ASPIRE - Story Street, B2H4, Bridging the Gap	Scattered	37	Families
Share	Share - Lincoln Place	Site-based	30	Singles/Couples
Share	Share - Senior Program	Scattered	5	Over 55+
Share	Share Step Forward	Scattered	13	Singles/Couples
VHA	Central Park Place	Site-based	70	Singles/Couples
VHA	Central Park Place - VASH	Site-based	2	Veterans
VHA	Freedom's Path - VASH	Site-based	40	Veterans
VHA	Isabella Court II	Site-based	85	Families
VHA	HUD VASH	Scattered	182	Veterans - All
VHA/Lifeline/CSNW	Merriwether	Site-based	32	Singles/Couples
VHA	Rhododendron Place	Site-based	30	Singles/Couples
Total Units			660	

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

Clark County struggles with having enough affordable rental options for households with rental barriers or low incomes. Although relationships between the small cities in Clark County are good, it can be difficult to outreach and provide a high level of service and affordable housing to the more rural communities in the county; many of the affordable housing projects are developed in or near the City of Vancouver where more services and economic opportunities are available. Public transportation and social services outside of the metropolitan areas are limited. Available resources to meet the needs identified in this Consolidated Plan are a constraint. Clark County continues to assess ways to increase affordable housing in outlying areas of the county through planning and conversation with small cities.

As stated in the Homeless Action Plan, Clark County is fortunate to have many philanthropic and community-minded businesses, individuals, foundations and nonprofits seeking to address homelessness. Through these partnerships our system offers shelter (safe parking spaces, winter shelter, severe weather shelter and congregate shelter), housing (recovery, interim and permanent), basic need services (showers, food/meals, laundry, fellowship), rental assistance and much more. Clark County has a robust Homeless Crisis Response System doing outreach and maintaining shelters.

A 2015 Housing Needs Assessment by the State of Washington determined that there were just 16 units affordable for every 100 households making below 30% AMI. The study identified just 48 subsidized units available for every 100 qualified renters in the 0-30% AMI category. Housing development in Clark County has not kept up with the pace of population growth, and affordable housing development is far behind.

Emergency rental assistance programs available during the COVID-19 pandemic contributed significantly to filling the gap in housing affordability and preventing households from becoming homeless. These programs are now ending, leaving an additional gap in rental assistance for permanent housing available directly to homeless or at-risk families.

While the current service delivery system covers all sub-populations and types of services needed to prevent and end homelessness, resources are not scaled to the extent needed to adequately respond to homelessness. The Homeless Action Plan calls for increased mobile outreach, strengthening prevention and diversion practices, leveraging community resources and increasing housing options, both for transitional and permanent housing.

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:

A stagnant wage structure, rising rents, low vacancy rates, domestic violence, mental and physical health challenges, the inability to gain or sustain stable employment, generational poverty, and loss of system support by those leaving institutions are all characteristics that have been linked with instability and increased risk of homelessness.

Identify priority needs for qualifying populations:

Clark County has identified Affordable Housing and Homelessness as one of the top needs in our community as shown in the 2020 Consolidated Plan:

Priority Need Name	Affordable Housing and Homelessness
Priority Level	High
Population	Extremely Low, Low, Large Families, Families with Children, Elderly, Frail Elderly, Chronic Homelessness, Individuals, People with Disabilities, Chronic Substance Abuse, Veterans, Persons with HIV/AIDS, Victims of Domestic Violence, Unaccompanied Youth
Associated Goals	Affordable Housing and Homelessness
Description	Maintain and improve the response to homelessness including emergency shelter, rapid rehousing, transitional housing, permanent supportive housing, and construction or rehabilitation of affordable multifamily units.
Basis for Relative Priority	Priority needs are based on data discussed earlier, including affordable housing, community development, homelessness, and non-homeless special needs.

Clark County has also identified the need to fund programs and projects which will increase access to affordable housing quickly and prevent loss of existing units or beds.

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:

Consultation with service providers and other stakeholders. Availability of funding to support the variety of affordable housing solutions.

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:

Clark County considered applications for HOME-ARP funding through the annual 2022 CDBG and HOME Request for Applications. HOME-ARP activities are eligible under the current application process and were considered with applications for entitlement funding. All applications received were reviewed by the Urban County Policy Board, comprised of mayors or their appointees of the small cities and towns within Clark County and chaired by a Clark County Councilor. Highest scoring applications within each category are fully funded and a lower scoring application may receive partial funding or no funding based on availability. Affordable housing program and project applications were reviewed by staff for suitability for CDBG, HOME or HOME-ARP funding.

Clark County will not administer any HOME-ARP activities directly.

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 and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Not applicable. Clark County is not providing administrative funds to a subrecipient or contractor.

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 by Activity Type

HOME-ARP Activity Type	Funded Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$141,800	7%	N/A
Non-Congregate Shelter	-	-	N/A
Tenant Based Rental Assistance (TBRA)	\$640,100	32%	N/A
Affordable Rental Housing Development	\$923,819	46%	N/A
Non-Profit Operating	-	-	5%
Non-Profit Capacity Building	-	-	5%
Administration and Planning	\$301,009	15%	15%
Total HOME-ARP Allocation	\$2,006,728	100%	

In addition to determining funding allocation by activity type, Clark County has identified the specific projects it intends to fund with HOME-ARP funding. Below is a brief description of each project.

Project: Vancouver Housing Authority Weaver Creek Affordable Housing Development

Category: Affordable Rental Housing Development

Award: \$923,819

Construction of an 80-unit new affordable rental housing complex in Battle Ground, a small city in Clark County.

Project: Share ASPIRE TBRA

Category: Tenant-Based Rental Assistance

Award: \$253,000

Description: Rental assistance program.

Project: Share ASPIRE Housing Case Management and Supportive Services

Category: Supportive Services

Award: \$50,000

Description: Housing case management and supportive services for Share TBRA recipients.

Project: Lifeline Connections Recovery TBRA

Category: Tenant-Based Rental Assistance

Award: \$128,400

Description: Rental assistance program specializing in assistance for individuals with behavioral health needs.

Project: Lifeline Connections Recovery TBRA Housing Case Management

Category: Supportive Services

Award: \$25,000

Description: Case management and supportive services for Lifeline Connections TBRA recipients.

Project: Janus Youth the Nest TBRA

Category: Tenant-Based Rental Assistance

Award: \$103,000

Description: Rental assistance for youth ages 18-25

Project: Janus Youth the Nest TBRA Case Management

Category: Supportive Services

Award: \$20,000

Description: Case management for the Nest TBRA clients

Project: YWCA Domestic Violence TBRA

Category: Tenant-Based Rental Assistance

Award: \$151,200

Description: Rental assistance program for individuals and families fleeing domestic violence.

Project: YWCA Domestic Violence TBRA case management

Category: Supportive Services

Award: \$28,800

Description: Case management and supportive services for clients receiving tenant-based rental assistance through the Domestic Violence TBRA program.

Project: Salvation Army TBRA

Category: Supportive Services

Award: \$18,000

Description: Case management and supportive services for TBRA clients. Note this funding will support clients receiving tenant-based rental assistance with County HOME funding.

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:

Although there is a high need for all the activities that are eligible under HOME-ARP, Clark County receives Document Recording fees, Community Service Block Grant, and Consolidated Homeless Grant funding that can support many of the supportive services needed for homeless and at-risk households. The County and its community partners have also made significant strides in establishing higher shelter bed capacity and opening more non-congregate shelters over the last few years, which will remain operational indefinitely.

Clark County receives very limited funding for construction of new housing, usually around \$500,000 per year in HOME entitlement funding. While additional funding was available for a variety of emergency housing assistance programs over the last few years, the construction of new units was set-back significantly by construction delays, supply chain issues, vast and unexpected increases in the cost of building, and the need for service providers to pivot to meeting the emergency needs of households impacted by the COVID-19 pandemic, rather than focusing on longer-term housing production projects. Because of the high cost of housing, the long-term impact of constructing new units and the lack of other County resources available for new construction, Clark County has prioritized HOME-ARP funding for construction of affordable housing. The Vancouver Housing Authority Weaver Creek project will provide 80 new units of housing in the small city of Battle Ground. This project is additionally beneficial in its proposal to bring more affordable units to Clark County farther out from the population center around the City of Vancouver where the majority of affordable housing is located.

Clark County's annual HOME application process limits applicants to a maximum funding award of \$300,000. Often, applicants will request HOME funding over several years to accumulate enough funding to acquire or build new housing. The Urban County Policy Board raised that maximum for the 2022 funding cycle to try to facilitate a shorter pre-development timeline with HOME-ARP funds.

Clark County is unique in that it has ongoing Tenant Based Rental Assistance programs provided by multiple agencies who have a strong understanding of the HUD HOME requirements and the homeless system goals. Clark County has been targeting HOME TBRA to homeless households for many years. At least four agencies in Clark County have experience with HOME TBRA and serve subpopulations such as families, youth, chronically homeless people, and people who are engaging in substance use or mental health treatment programs. All TBRA providers are required by contract to serve households referred by the Housing Solutions Center, the coordinated entry system in Clark County. Because of this organizational capacity and history of experience, TBRA is an efficient way for Clark County to help additional households exit homelessness or prevent their imminent homelessness with the HOME-ARP funding. This approach will also help to fill the gap left in rental assistance available when the last of COVID-related emergency rental assistance has been expended.

In addition to direct rental assistance payments, Clark County is also proposing to use HOME-ARP funds for housing case management through our TBRA providers. The County recognizes the need to support households through the challenges of acquiring and maintaining housing, and help these

households become self-sufficient so they can successfully exit TBRA programs. It was also clear from consultation with service providers and stakeholders that there was a need for additional funding for supportive services in the affordable housing system.

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:

HOME-ARP funding will support construction of an 80-unit affordable housing development. Clark County intends for approximately 4-5 of these units to be HOME-ARP-specific units available to the four qualifying populations.

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:

Although per-unit subsidy limits are waived for HOME-ARP funding, Clark County anticipates roughly following the established cost per unit for new construction. The following are maximum per-unit subsidy amounts for HOME Participating Jurisdictions in Washington State: 0 Bedrooms \$153,314; 1 Bedroom \$175,752; 2 Bedrooms \$213,717. Using these limits as a guide, Clark County hopes to achieve one new HOME-ARP unit for each \$200,000 awarded. With the need to serve all qualifying populations, subsidy per unit may be higher if necessary to ensure the units are financially viable long-term.

Preferences

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.

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:

The YWCA TBRA program will give preference to households fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. Individuals can access this program directly by contacting YWCA or may access it through coordinated entry with the Council for the Homeless.

The other TBRA programs will be accessed through the Council for the Homeless' Coordinated entry. Homeless households and households at-risk of homelessness are eligible for tenant-based rental assistance. The coordinated entry system prioritizes assistance by vulnerability: homeless households have preference over households at-risk of homelessness, and unsheltered homeless households are highest priority.

Within the qualifying populations, Lifeline Connections TBRA program gives preference to individuals with behavioral health needs. Lifeline frequently serves Veterans. Janus Youth the Nest TBRA gives preference to youth-headed households (ages 18-25). Supportive services provided to Salvation Army TBRA recipients will support households who are also eligible for regular HOME funding.

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:

By constructing additional rental units and providing additional capacity to our Tenant-Based Rental Assistance programs, households currently experiencing homelessness or who are housing-insecure in one of the other qualifying populations will be moved into and stabilized in housing.

Coordinated entry prioritizes placement by vulnerability. Individuals who go through coordinated entry may be placed with a TBRA provider with specific competencies to meet their needs (YWCA – survivors; Lifeline – behavioral health; Janus – youth), but overall, there is not a *preference* to place these segments of the population. All homeless families and those at risk of homelessness will qualify for TBRA. All members of each qualifying population will qualify for newly constructed rental units.

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:

Through the variety of programs and projects Clark County intends to fund through HOME-ARP, all qualifying populations will be served through the HOME-ARP grant.

The largest share of HOME-ARP funding will go towards Vancouver Housing Authority for construction of the Weaver Creek Affordable Housing project. This affordable housing development will not establish preferences for unit rental between the qualifying populations. Populations who are homeless or at risk of homelessness and other populations who would be stabilized in housing by access to these units will qualify. This includes households fleeing domestic and sexual violence and qualifying Veteran households.

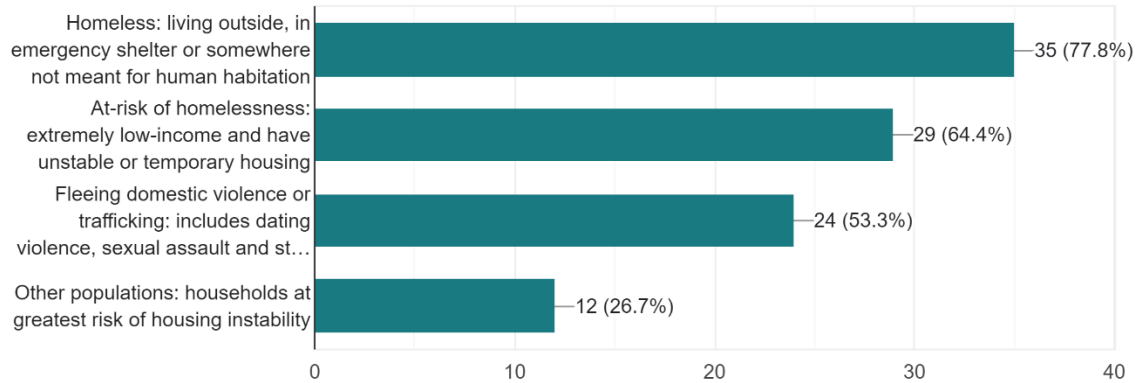
HOME-ARP Refinancing Guidelines

Clark County does not plan to use any HOME-ARP funding for refinancing existing debt.

Appendix A: HOME-ARP Stakeholder Survey Response Charts

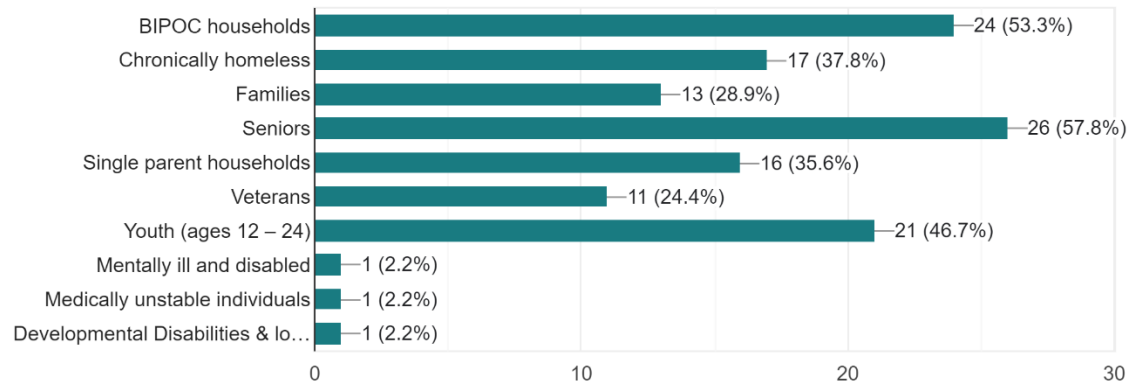
Of the eligible populations identified by HUD for this funding, should any of the below be prioritized? You may select more than one.

45 responses



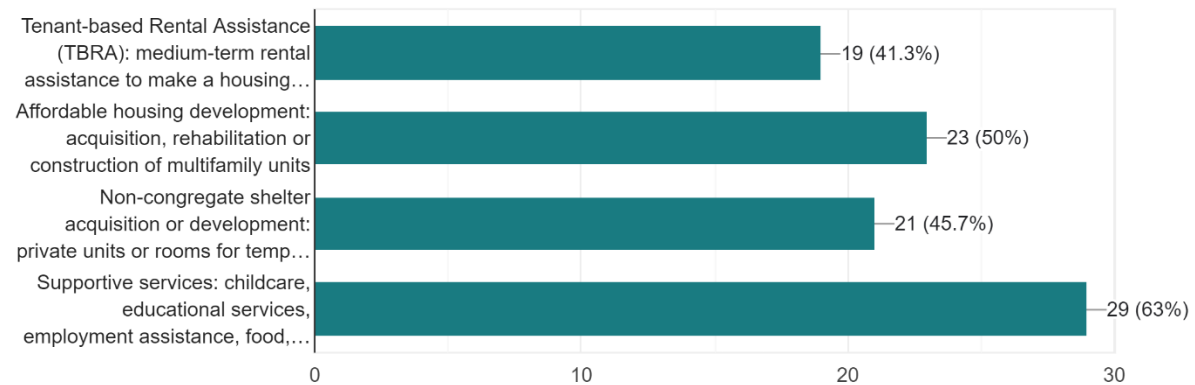
Are there subpopulations that you would like to see prioritized for homelessness assistance? You may select more than one.

45 responses



The following are HOME-ARP eligible activities to serve qualifying populations. Should any activity be prioritized? You may select more than one.

46 responses



Appendix B: HOME-ARP Stakeholder Survey Qualitative Responses

Clark County proposes to allocate a portion of HOME-ARP funding to applications received through the 2022 HOME RFA, and to make a direct allocation to an eligible project or projects identified through consultation with partner organizations. Do you have comments or feedback on this proposed allocation process?

No

Shared Housing should be considered as a cost-effective preventive program.

Support this process

Please consider partnering with WSW as are strong stewards of Federal funding and there is high need for increased employment services and supportive services for those who are not engaged in the labor market.

It is important to work with partner organizations with diverse leadership and experience. I would define this as organizations with leadership that includes women and BIPOC individuals, immigrants, veterans and the voices of those with lived experience that reflects those served, and those who serve the houseless and housing insecure populations effectively. Clark County's inspection of these shelter facilities has to improve. County inspectors should inspect facilities much more frequently and spontaneously - without making an advance appointment - in order to ensure that shelters are clean and the food is safe.

Considerations in eligibility, technical assistance and support to BIPOC led organizations from application and funding.

prioritize new/additional service, not simply paying for work already being done

It would be important to allocate funds to organizations that are well plugged into the communities that are selected as top priorities to serve and that they are already doing the work or have the capacity to stand up programs as soon as possible.

Need to be shovel-ready projects

I support this effort. Would love to see the projects be comprehensive in scope to include more than just shelter but also the supports needed to sustain housing.

N/A

Working in the Eviction Resolution Program, we have identified vulnerable households are the most likely to end up homeless. These populations include elderly, disabled and children in very low income households. Housing is the priority followed by additional services. Due to the Moratorium lift, we have received over 3700 cases.

Sounds like a good idea to fill an identified gap.

Allow new proposals in case others in the community may have opportunity to add shelter beds albeit it is extremely difficult to acquire new real estate/space.

A list of the eligible projects should be available for the public to make comments and/or vote on which projects the community would like to see receive funds.

Seems like many of the projects are located in the City - It would be great to see innovation / investment in scattered county sites

This is a good idea.

Unclear. Would it include Salvation Army's application?

The HOME-ARP allocation plan is required to include a needs assessment. The draft needs assessment has been provided with this survey. If you have comments or feedback on the draft needs assessment please provide them here:

Ok

For the dignity of all, people should have their own independent units for sleeping and privacy. Some shared facilities may be practical, but the 80 cots in a building model is not a solution. The county should invest in small storage lockers and make them available to people without charge. This would be safer for everyone, and allow people to protect the very little they may have from being stolen, ruined or treated like trash by municipal authorities. (It also solves the image problem that impacts businesses in areas where the houseless may congregate.) It would solve problems and gain compliance from those resistant or rebellious over their campsites, if they know they can have access to their possessions and do not need to stand their ground guarding them or carrying them on their backs. There are other small things that can be done to help individual people, create a sense of belonging to our community and show respect for each person's humanity.

none at this time

Nothing to add--everything I would think of appears to be addressed.

Looks good.

N/A

I align with your needs assessment and want to clarify that my answer to prioritizing households includes domestic violence in single parent households. We have work more than a few cases with domestic violence in the households facing eviction.

The assessment is very helpful. No additional comments.

Households impacted by domestic violence seems to be a disproportionate under-count. We work with a lot of survivors who are remaining in an unsafe household (and therefore would not be counted as "reason for homelessness") because of lack of options for leaving. I recognize that the purpose of this funding is to prevent homelessness, so it's good to know who is currently homeless because of DV/SA, but we also know people currently live outside and experience sexual assault/DV. Safe and affordable housing would help them leave abusive situations.

The assessment of community need is solid.

Are you aware of a specific program or project in need of funding that may be an appropriate recipient for Clark County HOME-ARP funds? Eligible programs or projects must be located in

Clark County, be a HOME-ARP eligible activity serving a qualifying population, and must have the capacity to accept HUD funding and spend it following County and Federal HOME requirements within the next few years.

No

Family Promise of Clark County's Emergency Shelter Program

Workforce SW Washington

HUD tracking and reporting requirements are difficult for many of the smaller nonprofits that provide services but operate on small budgets, small staffs and mostly volunteers. If you could have a "collective" of small organizations who received support from the County to assist with meeting those Federal HOME requirements - have that work streamlined by county employees who are skilled in the requirements - your funds could go a lot further in meeting the actual needs of the houseless and housing insecure. Mostly volunteer 501c3 organizations are not equipped to handle all that paperwork and do the work.

Our Place/Nuestra Casa Multicultural Center

nothing to add at this time

None

The Mullen-Polk Foundation is seeking funding to build a 15-20 studio apartments to help youth between the ages of 17-25 that are considered homeless or at risk of becoming homeless. These youth have ages out of the foster care system.

Homeless medically unstable individuals.

Funds which help people get to work to be able to stand on their own two feet - education/training programs? Like the Skills Center?

I am not

N/A

I don't have a specific recommendation but stabilized sustainable housing for vulnerable populations would be ideal.

Outsiders Inn is building capacity and preparing to add more non-congregate shelter space in the community through partnerships with others.

"Clark County Volunteer Lawyers Program is seeing an increased demand for pre-eviction/eviction prevention issues. Whether habitability, discrimination, unfair housing practices, or failure to pay rent (before an eviction is started), CCVLP doesn't have the capacity to serve everyone with these issues (and prevent an eviction from moving forward) with volunteer attorneys alone.

CCVLP can also use additional resources in its Survivor Support program-serving active survivors of DV/SA, many of whom are housing insecure. "

It would be great if we could identify existing sites to upgrade or convert to low income housing - - Converting the mobile home site on Hwy 99, for example, could be upgraded to safe low income housing. Must be other under-used site opportunities that with help on conditional use permits could be developed like the Community Roots community for example.

Council for the homeless rent assistance

"Council for the homeless diversion assistance
Share Rent assistance"

Salvation Army would like to be considered for diversion dollars as well as RRH.

Do you have additional comments on the development of the HOME-ARP Allocation Plan?

Thank you for helping our community members stabilize and survive!

Well done!

I'm pleased to see that for the first time it mentions shared housing. However, I think attention should be paid to supported sanctioned camping and health services like dumpsters and public toilets. Providing dumpsters and toilets would greatly reduce risk to the general population. It would reduce environmental risk, and would probably reduce some of the objections to homeless camps. Also, perhaps it is out of the purview of this report, but we won't eliminate homelessness until we eliminate some of the root factors: inadequate wages, unaddressed mental health needs, inadequate laws and enforcement of renter protections and runaway greed.

I'd like to see more small grants given to spur nonprofit involvement like the model of Odyssey World International Education Services' "Downtown Dignity Project." Odyssey provides small visa giftcards that allow houseless people to purchase necessities like feminine hygiene products, deodorant, soap, shoe laces, underwear, socks, a can opener (without one it's hard to use canned food in most food boxes), etc. We really need a committed community that is able to overcome our collective distress over people on the street and replace it with meaningful empathy and compassion interwoven with and supported by health and social services and the other practical aspects of community care.

safe and affordable or even subsidized child care support for low income households is essential as a support to this program. Lack of child care is a big barrier to people who want to work to sustain themselves and their families, or people who have a small business and need to be able to work without worrying about how their children will be taken care of.

This money should be used to address the immediate health and safety crisis of people living in squalor on the sides of our freeways, in trail systems, and on our streets. Don't wait for permanent housing to be available. Get them into more humane living conditions now.

None. Thank you!

No additional comments. Thanks.

N/A

Thank you for the opportunity to provide feedback.

No

Since Proud Ground provides services to low/moderate income first time homebuyers we would advocate that a portion of the funds be used towards acquisition of properties for first time homebuyers. Thank you!

Keep doing what you're doing!

The need for RV parks that take older RV's.

The Salvation Army is eager to join others in solving the homeless crisis, especially for families.