

**A Substantial Amendment to
Alabama Housing Finance Authority’s
2021 HOME Action Plan**

HOME-ARP ALLOCATION PLAN
Revised February 22, 2023

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I. PURPOSE AND SCOPE OF THIS HOME-ARP ALLOCATION PLAN

The American Rescue Plan (ARP), enacted on March 11, 2021, provides \$5 billion to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability across the country. These grant funds will be administered through HUD's HOME Investment Partnerships Program (HOME).

On April 8, 2021, HUD allocated HOME-ARP funds to 651 grantees using the HOME formula established at 24 CFR 92.50 and 92.60. The HOME-ARP regulatory requirements were released by HUD in CPD Notice 21-10, on September 13, 2021. AHFA was allocated \$41,632,082 in HOME-ARP grant funding on September 24, 2021.

AHFA developed this Substantial Amendment to its 2021 HOME Action Plan - HOME-ARP Allocation Plan (HOME-ARP Allocation Plan) in accordance with The HOME American Rescue Plan and CPD Notice 21-10 to utilize HOME-ARP funds for eligible activities benefiting Qualifying Populations (QPs) in a manner which is most efficient and effective for Alabama.

This HOME-ARP Allocation Plan applies only to the AHFA 2021 HOME Action Plan and does not modify AHFA's HOME Action Plan for any prior or subsequent year. To the extent any provision of this HOME-ARP Allocation Plan applies only to a specified period, that provision affects the 2021 HOME Action Plan only for the period specified. Except to the extent expressly amended by this HOME-ARP Allocation Plan, all provisions of the 2021 HOME Action Plan remain in full force effect.

II. SUMMARY OF THE HOME-ARP CONSULTATION PROCESS

The Department of Housing and Urban Development (HUD) requires that each HOME-ARP Participating Jurisdiction consult with agencies and service providers whose clientele include HOME-ARP qualifying populations. In January 2022, AHFA began the process of seeking input for the development of its draft HOME-ARP Allocation Plan. AHFA contacted representative stakeholders from 19 different organizations in Alabama serving Qualifying Populations (QPs) in accordance with CPD Notice 21-10. More specifically, AHFA contacted representative stakeholders from the following types of organizations/entities: Continuum of Care (CoC), homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of QPs, and public private organizations that address fair housing, civil rights, and the needs of persons with disabilities. On Thursday, February 17, 2022, AHFA hosted a virtual meeting to collect information from stakeholders as part of the consultation process. The meeting was attended by 14 of the 19 representative stakeholders consulted. The stakeholders provided input regarding:

1. The supportive housing in use by the QPs served by the stakeholders.
2. The vouchers and/or subsidies utilized for the current housing for their QPs.
3. The ratio of available vouchers/subsidies for housing versus the availability of suitable housing for their QPs.
4. The type(s) and location(s) of housing needed for their QPs.

AHFA staff documented the information provided during the virtual meeting and requested studies or other pertinent data from the stakeholders that could further support or expand upon the information shared prior

to, during and after the meeting. Stakeholders were instructed to provide all applicable data to AHFA by February 28, 2022, for use in its development of an initial draft of the AHFA HOME-ARP Allocation Plan. Entities representing the Qualifying Populations identified by CPD Notice 21-10 were invited to participate in the consultation process conducted by AHFA. The table below lists entities that did not respond to invitations. The means of outreach is noted as well as the entity's level of participation.

<i>Below is a list of the 19 organizations consulted and a summary of the feedback received.</i> Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
<u>Alabama Department of Mental Health</u>	Government Entity – Public Agency Serves Alabama citizens with mental illnesses, developmental disabilities, and substance use disorders. Heads the Mental Illness Planning Council (MIPC)	1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 4. Virtual MIPC meetings (ongoing)	Currently utilizing set-asides in AHFA funded projects. Seeing decreases in the number of available units. Need units for transitional aged children with needs, aged 18-29. Need peer-run housing for those in substance abuse recovery. Need medical complex/facility separate from housing.
<u>Alabama Rural Coalition for the Homeless</u>	Non-Profit Agency AL-507: Continuum of Care (Balance of the State) Advocate of permanent supportive housing, homelessness prevention, and rehousing. Active in <u>Emergency Rental Assistance Program</u> .	1. Phone consultation 2. Virtual HOME ARP meeting 3. Email	Currently assist 4,688 in 42 of 67 counties. Have 187 active units with subsidies (majority in Lee, Dallas, and Walker counties, and the wiregrass region). Current voucher availability is ~\$4M through FY22 for short-term rapid rehousing. Utilize Emergency Solutions Grant (ESG) Housing Vouchers (~89 available). Most suitable housing type currently in use in rural areas is manufactured housing. Since June, \$2M spent housing 595 homeless families (342 with children). Need more housing units in rural areas.

<p><u>Veterans Affairs Homeless Program</u></p>	<p>Government Entity – Public Agency Homeless Veteran Service Provider</p>	<ol style="list-style-type: none"> 1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 	<p>Provide outreach, transitional housing, and permanent housing to homeless veterans.</p> <p>Currently have 282 vouchers (VASH). Have access to vouchers, need realistic access to housing units (handicapped accessible, able to work with criminal record, require support from CoCs, etc.)</p>
<p><u>Mid-Alabama Coalition for the Homeless</u></p>	<p>Non-Profit Agency AL-504: HUD Continuum of Care Montgomery City/County Advocates for: Homeless housing Community assessment, coordination & planning</p>	<ol style="list-style-type: none"> 1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 	<p>Provide rapid rehousing to homeless in Autauga, Montgomery, Lowndes, and Elmore Counties.</p> <p>Need property owners and landlords to allow former felons, families with 5+ children, single fathers with children, and seniors (55+). Need more units and relationships with existing property managers.</p>
<p><u>Brantwood Children’s Home</u></p>	<p>Non-Profit Foster Care Provider</p>	<ol style="list-style-type: none"> 1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 	<p>Provide Independent Living services for young adults aging out of the foster care system.</p> <p>Need housing with supports for these young adults who are not quite prepared or mature enough to be on their own. Need vouchers and units to support foster children who have extended family who could care for them if appropriate housing (5+ children) were available.</p>
<p><u>Life House Alabama</u></p>	<p>Non-Profit Supportive Housing Provider Provides: Transitional housing Job training Adult education Supportive services Case management</p>	<ol style="list-style-type: none"> 1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 	<p>Provide supportive housing for victims of domestic violence, those recovering from substance abuse, those transitioning from prison.</p> <p>Need housing to serve as middle-ground after rapid-rehousing, but before transition to permanent housing.</p>

<p>Alabama Department of Corrections – <u>Inmate Transition Services</u></p>	<p>Government Entity</p>	<ol style="list-style-type: none"> 1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 	<p>Need units for people releasing from the prison system (especially sex offenders) that provides a form of support/supervision.</p> <p>No housing = 1st step to failure. Basic housing is necessary, otherwise, there is not a lot of hope for successful reentry into society.</p>
<p><u>Mobile County Commission</u></p>	<p>Government Entity Local HOME PJ</p>	<ol style="list-style-type: none"> 1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 	<p>Also received HOME-ARP funds and plans to mirror/partner with AHFA’s HOME-ARP uses.</p>
<p><u>Auburn Housing Authority</u></p>	<p>Public Housing Authority</p>	<ol style="list-style-type: none"> 1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 	<p>Auburn Housing Authority has 304 units, with 2,060 on the waitlist. Lafayette Housing Authority has 102 units with 750 on waitlist. Roanoke Housing Authority has 50 units with 90 on waitlist. Have 18 veteran vouchers and no units. All have subsidies and vouchers, but not enough units. All types of housing can be used.</p>
<p><u>Community Action Partnership of North Alabama (CAPNA)</u></p>	<p>HUD Housing Counseling Agency</p> <p>Non-Profit Affordable Housing Developer (CHDO) Supportive services provider</p> <p>Advocates for: Financial literacy Community development Financial literacy Poverty reduction</p>	<ol style="list-style-type: none"> 1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 	<p>Rural rehabilitation and weatherization are needed. Assistance to help landlords make properties rentable.</p>

<p><u>Paladin, Inc.</u></p>	<p>Non-Profit Affordable Housing Developer (CHDO)</p> <p>Community Development Advocate</p>	<ol style="list-style-type: none"> 1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 	<p>Need for more affordable housing. Turnover in affordable housing is rare. Need better coordination of timing regarding availability of units to QPs.</p>
<p><u>Home - Neighborhood Concepts and Low-Income Housing Coalition of Alabama (LIHCA)</u></p>	<p>Non-Profit Affordable Housing Developer (CHDO) and Low-Income Housing Coalition Board Member</p> <p>Advocates for: Fair Housing for renters Housing needs Local / state housing policy Healthy living Eviction prevention</p>	<ol style="list-style-type: none"> 1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 	<p>Huntsville and Madison County markets are exploding. They provide housing for families and seniors at or below 30% AMI. Populations are priced out of the market. Need units for \$350/month.</p>
<p><u>Alabama Affordable Housing Association</u></p>	<p>Trade Association</p>	<ol style="list-style-type: none"> 1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 	<p>Developers are ready to assist utilizing existing relationships to financing and other program leveraging resources to build multifamily communities.</p>
<p><u>Ball HealthCare Services, Inc.</u></p>	<p>Affordable Housing Developer</p> <p>Elder Care Service Provider with expertise in cognitive care, dementia, and Alzheimer's.</p>	<ol style="list-style-type: none"> 1. Phone consultation 2. Virtual HOME ARP meeting 3. Email 	<p>Participated. No input provided.</p>

<u>YWCA – Central Alabama</u>	Shelter and Domestic Violence (DV) Service Provider Advocates for: DV Services Voting Advocacy Racial Justice Civil Rights	1. Phone consultation 2. Email	Did not participate. No input provided.
<u>Salvation Army</u>	Non-Profit Homeless Service Provider Social service programs Human and sexual trafficking advocacy Veterans’ services Prison services	1. Phone messages 2. Email	Did not participate. No input provided.
<u>Alabama Department of Human Resources</u>	Government Entity Independent Living Program	1. Phone messages 2. Email	Did not participate. No input provided.
<u>Second Shift</u>	Non-Profit Independent Living Services	1. Phone messages 2. Email	Did not participate. No input provided.
<u>Alabama Bureau of Pardons and Paroles</u>	Government Entity Special Populations and Programs	1. Phone messages 2. Email	Did not participate. No input provided.

AHFA sought input from agencies and organizations with existing and active collaborative stakeholder structures with a decades-old history of successfully addressing housing issues for what HOME ARP now defines as Qualifying Populations. These stakeholder groups have a history of service and advocacy for populations receiving supportive services for their unique and often challenging needs, which contribute to housing vulnerability. Two collaborative groups included in the initial consultation process because of their successful history are the Alabama Department of Mental Health and the Low-Income Housing Coalition of Alabama. The collaborations spearheaded by these groups are described below:

- Alabama Department of Mental Health (ADMH): Representing mentally and developmentally disabled citizens, including those affected by substance abuse and injury. Additionally, since 2018 AHFA currently serves on the Mental Illness Planning Council (MIPC) chaired by ADMH, which was created at the recommendation of the Technical Assistance Collaborative (TAC) in the [Alabama Permanent Supportive Housing Strategic Plan for the Alabama Department of Mental Health dated 9-6-2018](#). This study, and the subsequent and ongoing MIPC, includes input

from a wide range of stakeholders, including Central Alabama Fair Housing Center, Low Income Housing Coalition of Alabama, various Alabama Continuums of Care, Alliance to End Homelessness/Housing Inc., various mental health providers, disabilities awareness groups, consumer advocacy groups, and affordable housing development groups (including AHFA). The MIPC meetings are an ongoing element of the existing supportive housing work established after the Wyatt v. Sawyer settlement (c. 2000) by AHFA and ADMH. Including this ADMH and, by extension, the MIPC in the consultation process for the development of HOME-ARP is a natural and far-reaching extension, including all the Qualifying Populations identified in CPD Notice 21-10.

- Low-Income Coalition of Alabama (LICHA), *see Neighborhood Concepts, Inc. / Low-Income Housing Coalition of Alabama*:
LICHA was established in 2007 to address the housing crisis and increase housing opportunities for Alabamians with the greatest financial need. The group advocates for the availability of healthy homes and the State Housing Trust Fund funding. Their board includes fair housing advocates, developers, physicians, economists, financiers, housing managers, educators, local and state government offices, special needs and disabilities advocacy groups, and others. LICHA provides support and resources for non-profit organizations providing services and care for at-risk populations in the state. Their advocacy and cultivation of collaborations have yielded the development and preservation of permanent housing rental units across the state.
- The YWCA of Central Alabama:
As a social justice organization with a long-standing history of providing and advocating for voting rights, social justice, civil rights, community housing, child development, domestic violence services, economic empowerment programs, and supportive services, the YWCA was invited to participate in the HOME ARP consultation. Initial phone conversations about the program were followed with emailed information about the program and an invitation to the virtual HOME ARP Consultation Meetings on January 13th and February 17th of 2022. Representatives from YWCA did not attend nor provide input.

The other representatives listed in the table are self-evident organizations, either a single entity (e.g., Brantwood Children's Home) or a group association (e.g., Alabama Affordable Housing Association), that serve or advocate for Qualifying Populations listed in CPD Notice 21-10.

In January 2023, after a preliminary review of the AHFA HOME-ARP Draft Plan, HUD required AHFA to conduct additional consultations with organizations. Specifically, [Fair Housing Program organizations](#) or [agencies](#), [NAACP](#), [Legal Aid](#) and a [local chapter of ARC](#). AHFA provided the following offices with the Draft HOME-ARP Plan and requested review and input:

Fair Housing Initiatives Program Organizations:

1. [Central Alabama Fair Housing Center](#) – Faith R. Cooper, Associate Director
In summary, this office was unable to consider if the plan will affirmatively further fair housing despite acknowledged dire need for additional affordable housing of any type in Alabama. Stated this office and two other fair housing centers in Alabama are available and willing to work with AHFA in the future to review plans to ensure AHFA developments promote all the goals of the Fair Housing Act. The complete response is provided in Exhibit F-3.
2. [Fair Housing Center of Northern Alabama](#) – Lila Hackett, Executive Director
In summary, this office thoroughly reviewed the plan and found it accurately reflects the needs of the targeted populations. It echoed the need for creation of affordable housing options in particular for the elderly. The complete response is provided in Exhibit F-3.

3. [Mobile Fair Housing Center](#) – No Response (see Exhibit F-3 for contact information)

Fair Housing Assistance Program Agencies:

There are no Fair Housing Assistance Program agencies in Alabama.

NAACP:

1. [NAACP Alabama State Conference](#) – Kecia Hendrix

In summary, this office did not have any more revisions to the HOME-ARP Plan but would like to be included in the decisions and outcomes of the program relative to black citizens. The complete response is provided in Exhibit F-3.

Legal Aid:

1. [Legal Services Alabama, Inc.](#) – Felicia Pettway

In summary, this office provides legal representation in eviction cases, negotiates settlement agreements, secures funding from AHFA to prevent homelessness, and provides outreach services for clients facing homelessness. The complete response is provided in Exhibit F-3.

The ARC local chapter:

1. [The ARC of Alabama](#) (the largest organization in Alabama dedicated solely to advocating for the rights and needs of children and adults with cognitive, intellectual, and developmental disabilities) – No Response (see Exhibit F-3 for contact information)

III. PUBLIC PARTICIPATION

To ensure broad participation and input into the development of the HOME-ARP Allocation Plan, HUD also requires that each participating jurisdiction provide opportunities for the public to comment on the proposed HOME -ARP Plan, including the amount of HOME-ARP funds that will be received and the range of activities that the State of Alabama (State) may undertake.

In accordance with Section 42 of the Internal Revenue Code and the HOME and National Housing Trust Fund Regulations, notices of the Public Hearing and the 30-day public commenting period for the draft 2023 Housing Credit Qualified Allocation Plan, draft 2023 HOME Action Plan, draft 2023 National Housing Trust Fund Allocation Plan, and the draft AHFA HOME-American Rescue Plan (Plans) were published in the Birmingham, Huntsville, Mobile, and Montgomery newspapers on June 29, 2022, and on the Alabama Housing Finance Authority (AHFA) website. AHFA emailed 1,796 notices on June 21, 2022, and 1,875 notices on June 30, 2022, of the draft Plans availability to interested parties, requesting that they submit oral comments at the Public Hearing or written comments regarding the proposed Plans by 5:00 p.m. CDT on August 15, 2022. AHFA conducted a Public Hearing on Thursday, July 14, 2022, at 10 AM CDT at the HOME Builders Association of Alabama, located at 7515 Halcyon Summit Drive, Montgomery, Alabama 36117. During the designated commenting period, AHFA received 122 written comments from 36 individuals and organizations pertaining to the 2023 Plans. Affidavits of Publication of Public Hearing Notice and AHFA MF Notices regarding the Public Hearing are provided in Exhibit F-2. The comments are available for review at the following AHFA website link:

<https://www.ahfa.com/multifamily/allocation-application-information/current-year-allocation-plans>

AHFA reviewed the comments received and revised the Plans based on certain comments submitted. A summary of the proposed changes to the HOME ARP is attached (See Exhibit F-2). Once the final Plans have been formally approved, we strongly encourage each reader to review the final Plans completely to view any changes made by AHFA in their full context. When revisions have been finalized and approved, the Plans will be available for review in their entirety at the following AHFA website link:

<https://www.ahfa.com/multifamily/allocation-application-information/current-year-allocation-plans>

AHFA wishes to thank the many individuals and organizations who provided comments during the commenting period. While all comments were carefully reviewed and considered, only the most

equitable comments pertaining to the process for the entire state and the variety of program participants resulted in changes being made to the final Plans. As the administrator of the Plans, AHFA's goal is to develop written criteria for the Plans that will provide equal access to all types of affordable housing developments, which include but are not limited to: various construction types (new construction, acquisition, rehabilitation, and adaptive reuse, etc.); diverse target populations (families, seniors, persons with mental and physical disabilities, Veterans, and homeless populations, etc.); and geographical characteristics (rural, metropolitan, qualified census tracts, distressed areas, etc.). In attempting to reach varied needs and population types across the state, our greatest challenge is to develop a fair and balanced allocation methodology with the intent to ensure that all applications, regardless of the targeted population and construction type, will have a fair chance of competing during each Application Cycle.

To that end, please keep in mind that certain perceived scoring impediments for a particular type of organization can be offset by other incentives in the Plans, which may not be necessarily applicable to other types of organizations. In addition, please consider that the Plans are not intended to serve as a replacement for other discontinued housing programs, which may have had different standards, costs, or otherwise. This is especially true as it relates to construction design standards. Any applicant that proposes to include design standards that significantly exceed AHFA standards or to include other design standards mandated by other programs must obtain additional funding sources to offset any additional costs, assuming the project's costs exceed AHFA's definition of reasonable costs. As an alternative and when feasible, applicants should consider submitting an application for Multifamily Housing Revenue Bonds, which are subject to availability, provided on a first-come, first-served basis, and subject to the criteria and requirements of the applicable Plan.

IV. NEEDS ASSESSMENT AND GAPS ANALYSIS

In accordance with HUD requirements, AHFA conducted an evaluation of the size and demographic composition of qualifying populations within the State and an assessment of the unmet needs of those populations. In addition, AHFA conducted research to identify any gaps within the State's current shelter and housing inventory as well as the service delivery system. AHFA used 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. AHFA also used optional tables provided on the following pages.

Housing Needs Inventory and Gap Analysis Table - Homeless

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# Of Beds	# Of Units	# Of Beds	# Of Units	# Of Beds					# Of Beds	# Of Units	# Of Beds	# Of Units
Emergency Shelter	526	181	1126	NA	131								
Transitional Housing	305	119	357	NA	76								
Permanent Supportive Housing	590	204	2229	NA	1140								
Other Permanent Housing	0	0	42	NA	10								
Sheltered Homeless						147	857	211	345				
Unsheltered Homeless						267	678	329	6				
Current Gap										534	267	1007	

Data Sources Used: 2021 HIC Counts by State (Hud exchange), 2021 and 2020 PIT Counts by State (Hud Exchange), Homeless in Alabama Statistics 2019. Homeless Estimation by State | US Interagency Council on Homelessness (usich.gov), 16th Annual Domestic Violence Counts Report. (NNEDV.org)

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Housing Needs Inventory and Gap Analysis Table – Non-Homeless

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# Of Units	# Of Households	# Of Households
Total Rental Units	581,999		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	156,133		
Rental Units Affordable to HH at 50% AMI (Other Populations)	111,681		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		137,376	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		73,024	
Current Gaps			210,400

Data Source Used: ACS 5-Year 2020

Description of the size and demographic composition of qualifying populations within AHFA boundaries:

1) **Homeless:**

During the 2021 Point in Time Count conducted by AL-507 Alabama Balance of the State CoC, the following demographics were identified:

- 190 total homeless individuals (52, or 27%, were under the age of 18)
- 125 households were counted (21, or 17%, contained children under the age of 18)
- 98 people were unsheltered (15, or 15% were under the age of 18)
- 72 unsheltered households were counted
- 105 of the homeless people were women (55%)
- 85 of the homeless people were men (45%)
- 4 of the homeless people were of Hispanic/Latin heritage (2%)
- 97 of the homeless people were white (51%)
- 80 of the homeless people were black (42%)
- 1 of the homeless people was of Asian heritage (<1%)
- 12 of the homeless people were of multiple races (6%)
- 11 of the homeless people were chronically homeless (6%)

2) **At risk of Homelessness:**

Per ACS-5-Year 2020 data, approximately 156,133 households (27%) of the renter households are extremely low income (0-30% AMI). Out of the 156,133 extremely low-income households, 137,376 (88%) of them are cost burdened (pay more than 30% of the household income toward rent) and are at risk of becoming homeless. In addition to the extremely low -income households, out of the 111,681 households with 31-50% AMI 73,024 (or 65%) of them are also cost burdened and are at risk of becoming homeless.

AHFA is the administrator of the Emergency Rental Assistance Program funded by the U.S. Department of Treasury for the State of Alabama (ERA Alabama). As of April 2022, ERA Alabama had helped 14,179 households (0-50% AMI) remain in their current rental households by providing rental and utility assistance and had prevented 1,038 evictions via its Imminent Eviction Prevention Initiative. At some point in the future, the Emergency Rental Assistance Program funds will expire, unless extended, and many of the low-income renter households may once again struggle to maintain occupancy in their rental units.

3) **Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking:**

According to the Alabama Coalition Against Domestic Violence (ACADV.org), nearly one in three adult women experiences at least one physical assault by a partner during adulthood. Two thirds of women physically assaulted by an intimate partner said that they were victimized multiple times by the same partner in a 12-month period. In Alabama, the most recent statistics for domestic violence homicide were 160 homicides reported in a 5-year period. Also 10,084 domestic violence aggravated assaults were reported in that same 5-year period. Unfortunately, most domestic violence is not reported. Only one-fourth of all physical assaults against women by intimate partners was reported to police, according to a national survey.

4) **Other Populations:**

According to the Point-in-Time (PIT) Count estimates of homeless veterans at a point in time in January 2020 by the Continuum of Care (CoC) in the State, Alabama has 329 homeless veteran, with only 231 of those veterans sheltered, which indicates 98 veterans are homeless without any shelter.

Description of 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 of housing assistance or to prevent homelessness; and,
- Those at greatest risk of housing instability or in unstable housing situations.

Based on data above, it is estimated that among those who experience sheltered and unsheltered homelessness, 3,422 individuals and 233 families will require a supportive housing intervention to exit homelessness. We estimate the existing Supportive Housing programs house 319 households per year, leaving a gap of 3,366 units. This includes both those who are chronically homeless, and a percentage of individuals with disabling conditions who have not yet been documented as chronically homeless in the Homeless Management Information System (HMIS.)

There are 11,358 households who experience homelessness and who lack access to safe and affordable housing, but whose needs do not rise to the level of the more intensive supportive housing intervention.

AHFA identified and considered the following current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, tenant-based rental assistance, and affordable and permanent supportive rental housing:

According to the 2021 HIC and PIT Count Reports, Alabama has 2,521 emergency shelter and transitional housing beds in use. Not including COVID-related increased rental assistance programs, 300 households were in rapid rehousing programs, the majority of which were families with children. Additionally, there were 3,959 units of Supportive Housing reported in the 2021 Housing Inventory Count.

Utilizing data from IMS/PIC System and HUDCAPS (as of 3/31/2022), 546 Emergency Housing Vouchers were awarded to Alabama PHAs of which only 143 (26%) are in use.

According to the HUD-Veterans Affairs Supportive Housing data, the total number of HUD-VASH Vouchers for Alabama 2008 through 2020 was 1,295.

There were 255 Mainstream Voucher Awards in Alabama reported by HUD in 2019. These vouchers assist non-elderly persons with disabilities.

Identification of gaps within the current shelter and housing inventory as well as the service delivery system:

Unfortunately, several counties in the balance of the State do not have shelter facilities for those experiencing homelessness. The unsheltered homeless count of 1,280 signifies the gap in shelter beds across the State. Additionally, multiple shelters currently operating do not provide separate sleeping quarters for individuals and families. Very few can accommodate the variety of family and household compositions of those experiencing homelessness, resulting in individuals and households remaining unsheltered. This gap in available and appropriate housing was verified by each of the consulting representatives who participated in the HOME-ARP data collection process.

Identification of 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:

HUD’s Comprehensive Housing Affordability Strategy (CHAS) reports that 251,236 Alabama renter households have at least 1 of 4 severe housing problems. These households lack safe, economically sustainable housing and are at increased risk of housing instability and homelessness. Therefore, households that spend more than 30% of their income and live in substandard housing are unstably housed and at risk of homelessness. Substandard housing is defined at 24 CFR §5.425, which reads:

- 1) When unit is substandard. (See §5.415(a)(2) and (c)(2)(ii) for applicability of this section to the Section 8 Certificate/Voucher, Project-Based Certificate, Moderate Rehabilitation programs and the public housing program.) A unit is substandard if it:
 - a. Is dilapidated; Does not have operable indoor plumbing
 - b. Does not have a usable flush toilet inside the unit for the exclusive use of a family
 - c. Does not have a usable bathtub or shower inside the unit for the exclusive use of a family
 - d. Does not have electricity, or has inadequate or unsafe electrical service
 - e. Does not have a safe or adequate source of heat
 - f. Should, but does not, have a kitchen; or
 - g. Has been declared unfit for habitation by an agency or unit of government.

2) Other definitions-

- a. Dilapidated unit. A housing unit is dilapidated if:
 - i. The unit does not provide safe and adequate shelter, and in its present condition endangers the health, safety, or well-being of a family; or
 - ii. The unit has one or more critical defects, or a combination of intermediate defects in sufficient number or extent to require considerable repair to rebuilding. The defects may involve original construction, or they may result from continued neglect or lack of repair or from severe damage to the structure.

Identification of priority needs for qualifying populations:

The Needs Inventory and Gaps Analysis, and input from the organizations that participated in the consultation process with AHFA, clearly confirms that there is an under supply of available affordable housing for qualifying populations. Information collected during the HOME-ARP consultations revealed the following immediate needs for vulnerable populations:

Alabama Department of Mental Health:

- Need units for transitional aged children (18-29) with special needs
- Need peer-run housing for those in substance abuse recovery
- Need medical complex/facility separate from housing

Alabama Rural Coalition for the Homeless (CoC) – homeless populations:

- Housing for families
- More housing units in rural areas

Mid-Alabama Coalition for the Homeless (CoC) – homeless populations:

- Properties able to work with tenants with criminal records
- Properties that can accommodate large families
- More available units

Veterans Affairs – veteran populations:

- Handicapped accessible units
- Properties able to work with tenants with criminal records
- Tenants who require support from CoCs

Brantwood Children’s Home – young adult populations:

- Need vouchers and units specifically for children aging out of foster care (age 18-26)
- Need units to accommodate large families

Life House Alabama – transitional populations (DV, parolees, SA recovery)

- Need units, vouchers, and services for those transitioning between rapid re-housing and permanent housing

Alabama Department of Corrections – Inmate transition

- Need units

Auburn Housing Authority – PHA

- Need units of all types - 2,918 on waiting lists
- Have vouchers but no units available

Neighborhood Concepts – non-profit developer

- Need units for seniors at or below 30% AMI

Even when homeless and/or at-risk households have access to resources like rental assistance vouchers, emergency rental assistance, or supportive services, many of them are unable to find an available apartment that they can afford.

Explanation regarding how the level of need and gaps in shelter and housing inventory and service delivery systems statewide were determined based on the data presented in the plan.

AHFA utilized data available in the CHAS, the 2021 Point in Time Count Report, the 2021 Continuum of Care Housing Inventory Count Report, and the American Communities Survey to ascertain the number of individuals experiencing homelessness. Additionally, AHFA consulted the representative stakeholders and service providers who provided insight into the specific characteristics relative to the production of affordable housing that will best serve the homeless qualifying populations they serve.

V. HOME-ARP ACTIVITIES

The following is a description of the methods used by AHFA for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether AHFA will administer eligible activities directly:

AHFA will utilize HOME-ARP funds to fund competitive applications until all HOME-ARP funds are awarded to the development of new construction of affordable rental housing units and fund Operating and Replacement Reserve Accounts for the benefit of HOME-ARP Qualifying Populations. All new construction rental housing will be required to meet AHFA's current Design Quality Standards and Construction Manual. AHFA may consider Housing Credits, HOME, and/or National Housing Trust Fund Allocations in combination with HOME-ARP funds to maximize the number of units produced and strengthen the financial feasibility of affordable rental projects.

Each application must consist of the following primary team members: An owner/developer with construction/development and affordable housing experience; a representative non-profit or other entity representing or advocating for the needs of a specific qualifying population group, and a supportive services entity/provider for the ongoing support of the designated qualifying population group.

In addition, the primary team members must evidence a clearly defined management plan from the initial application submittal throughout the life of the project. Specifically, the primary team must submit a detailed plan which includes/identifies all or key members of the project's development, management, and services teams and provide supporting documentation regarding team members' experience, capacity, roles, responsibilities, and other information deemed necessary to successfully execute the development, manage the property, and serve the QP beneficiaries for the duration of the compliance period(s). A list of entities in Alabama that have expressed an interest in partnering in AHFA HOME-ARP projects is listed at www.ahfa.com (not an exhaustive list). All members of the HOME-ARP project team must be identified in the application and applicable service agreement(s) and/or Memorandum(s) of Understanding (MOUs) evidenced.

All applications must include the following project amenities:

- Washer/Dryer provided in each unit (3-7 cu. ft. capacity. Washer must be Energy Star rated.)
- Completely furnished Apartment Unit (all Qualifying Population Units). The apartment must include the following:
 - Living Area (sofa, chair or loveseat and side table or coffee table), Kitchen or Dining Area (table and 4 chairs), Bedroom(s) (bed, dresser, and nightstand)

Priority will be given to projects that demonstrate excellence/highest proficiencies in collaborative efforts (joint ventures), cost efficiencies, leveraging, affordable housing experience, and comprehensive, sustainable, and cost-efficient supportive services for QPs. See the scoring details outlined in the Exhibit F-1: Point Scoring.

All required AHFA-provided forms for current year application. The application forms and related instructions will be posted at www.AHFA.com prior to the beginning of the application cycle. AHFA will post these forms as they become available, and applicants should regularly check www.AHFA.com to begin work on the required forms as soon as possible. All AHFA-provided forms should be completed pursuant to instructions, legible and with all applicable spaces fully completed.

AHFA will not award any portion of AHFA HOME-ARP administrative funds to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP Allocation Plan.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Development of Affordable Rental Housing	\$35,387,369.70	85%	
Administration and Planning	\$ 6,244,812.30	15%	15%
Total HOME-ARP Allocation	\$41,632,082.00	100%	100%

Additional narrative, if applicable:

AHFA will allocate 85% of its total grant to the development of affordable rental housing. As noted, service providers indicated to AHFA the dire need for units to house their clients. AHFA will use HOME-ARP funds to pay for development hard costs (defined in 24 CFR 92.206(a), related soft cost (defined in 24 CFR 92.206(d) and operating cost assistance (defined in CPD Notice 21-10).

Description of 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 available data from the 2021 Housing Inventory Counts by State and the 2021 Point-in-Time Counts by State in combination with the first-hand knowledge and experiences shared by homeless service providers in Alabama make apparent the lack of affordable housing units available to assist populations who are homeless or at risk of homelessness. In Alabama, these populations are inclusive of all Qualifying Populations as defined in the HOME-ARP program.

Further, the service providers reported having sufficient funding sources to provide supportive services and to assist with housing of clients. The consistent problem is the lack of appropriate and available housing, which results in utilizing hotel rooms in cases where that is possible, or unsheltered families and individuals. According to service providers, affordable rental units are the preferred type of housing for the QPs they serve.

AHFA's HOME-ARP Allocation Plan will focus on incentives to construct affordable rental units in collaborative developments that include experienced affordable housing developers, managers, owners, and service providers.

AHFA may allocate HOME-ARP funds to an approved project in one of the following ways:

1. As forgivable grant. Repayment of a grant of HOME-ARP funds will be forgiven entirely (but never in part) if the funded Project remains in compliance with HOME-ARP and AHFA requirements for the entire HOME-ARP Affordability Period.
2. As a loan. The HOME-ARP loan will bear an interest rate of one-half of one percent (1/2%) accrued annually with all principal and accrued interest payments due at the end of the 15th year. In the event of default, AHFA reserves the right to set a default rate more than the prevailing Prime Lending Rate applicable at the time of default.

VI. HOME-ARP PRODUCTION HOUSING GOALS

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

AHFA estimates producing and supporting between 75 and 100 affordable rental housing units for qualifying populations and will provide available resources toward costs to: a) acquire land and construct housing units, and b) establish operating reserve accounts for each project's 20- year compliance period.

AHFA will use 85% of the total HOME-ARP funding for the construction and development of new affordable rental housing units. Approximately 70% of that funding will be used for eligible project hard and soft costs. AHFA will determine the reasonableness of eligible project costs by comparing aggregate cost data based on all applications received, historical cost certification, cost data of completed projects, and current cost data provided by AHFA third-party construction consultant reports. Any line-item costs, square footage costs or total unit costs exceeding a range of reasonableness may be disallowed at the determination of AHFA. Additional information and documentation (verified by AHFA and/or an AHFA third-party consultant) may be required to substantiate the reasonableness of the cost, including without limitation information regarding proposed costs that significantly exceed AHFA minimum Design Quality Standards and Construction Manual. Any allocation of HOME-ARP funds will be determined using AHFA's assessment of cost and overall application feasibility. The remaining 30% of that funding will be used to support the affordable rental housing unit for qualifying populations by capitalizing an operating cost assistance reserve. Project operating costs will be established by using historical AHFA funded projects operating costs.

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

The AHFA will utilize HOME-ARP funding to produce new construction affordable rental units for the benefit of Qualifying Populations in Alabama. The scoring priorities will incentivize applicants to partner

with experienced affordable housing developers and supportive services providers in order to provide quality affordable housing units with amenities and good locations throughout the State.

Preferences

AHFA will not give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

Additionally, AHFA will not identify a preference or use a preference or method of prioritization to 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.

Last, AHFA will not identify a preference(s) to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference.

VII. HOME-ARP REFINANCING GUIDELINES

AHFA will not provide HOME-ARP refinancing guidelines under its AHFA HOME-ARP Allocation Plan.

Exhibit F-1

Alabama Housing Finance Authority's

HOME-ARP Point Scoring System

WITHOUT LIMITING ANY OTHER PROVISION OF THIS PLAN, ALL DETERMINATIONS, CALCULATIONS, JUDGMENTS, ASSESSMENTS OR OTHER DECISIONS MADE BY AHFA UNDER THIS HOME-ARP ALLOCATION PLAN, INCLUDING WITHOUT LIMITATION RELATED APPLICATION INSTRUCTIONS, AHFA FORMS AND THE HOME-ARP ALLOCATION PLAN ITSELF, SHALL BE MADE IN AHFA'S SOLE AND ABSOLUTE DISCRETION.

The point scoring system described in this Exhibit and related provisions of the HOME-ARP Allocation Plan (collectively, the Point Scoring System) will allow AHFA to award points to projects that best meet the identified housing priorities for the State of Alabama. The Point Scoring System will rank each project in two sections (Points Gained and Points Lost). The ranking of each project will be determined by taking the Points Gained section and deducting the Points Lost section to get an overall project score. The Point Scoring System will largely determine which projects should be allocated.

In the event of a tie between two or more applications, the projects will be ranked in the following order to determine which application will receive priority:

First, the application serving a QP population that has not been previously recommended for approval.

Second, the application with the fewest missing documents and incomplete forms as determined by AHFA during the completeness review.

Third, the application with the highest amount of subsidy funding per unit from sources other than HOME-ARP funds, excluding other AHFA Multifamily funding sources.

AHFA reserves the right to deny an allocation of HOME-ARP funds to any applicant or project, regardless of that applicant's point ranking if, in AHFA's determination, the applicant's proposed project is not financially feasible or viable. Additionally, AHFA may recommend that a HOME-ARP allocation be made irrespective of the ranking order established by the Point Scoring System, based on the amount of HOME-ARP funds needed relative to the amount of HOME-ARP funds available for the project to be financially feasible.

Regardless of strict numerical ranking, the Point Scoring System does not operate to vest in an applicant or project any right to a reservation or allocation of HOME-ARP funds in any amount. AHFA will in all instances reserve and allocate HOME-ARP funds consistent with sound and reasonable judgment, prudent business practices and the exercise of its inherent discretion.

POINTS GAINED

Project Characteristics (Maximum of 108 Points)

Project Construction (Maximum of 38 Points)

Project Amenities (Maximum of 30 Points)

A maximum of 30 points in aggregate will be given to projects that provide extra unit/project amenities. Refer to the application and its instructions for the distinction between an extra amenity and a required amenity. Only the extra amenities listed below

will be eligible for points. If a project receives an allocation of HOME-ARP funds and fails to provide any extra amenity in the manner represented in the Application Package, the project and its Responsible Owners will be subject to point penalties and other sanctions in accordance with AHFA's 2021 HOME Action Plan.

5 Points will be given for each of the following extra amenities:

- Project Community Building/Community Room/Tenant Service Center (*Must have at minimum a kitchen (with refrigerator/freezer, cabinets, and a sink with counter space), community meeting room (with seating and activity areas commensurate to total number of units) and restrooms.*)

Please Note: If project is solely financed by HOME-ARP funds, the Community Building/Community Room/Tenant Service Center must have a Qualifying Population unit attached.

- Exterior Project Security Package *Must include, at a minimum, the following:*
 - Alarm (sound and/or third-party monitored) system at the clubhouse/ community building, resident manager's office, and laundry.
 - Camera/Video monitoring system to provide visibility of all pedestrian and vehicular traffic of all main Project entry and exit points, parking lot and Project amenities.
 - Lighting of all project amenities, parking lot(s), and all Project entry and exit points.
- Unit Security Package (*Each unit must have an alarm on all entry doors and windows*)
- Storm Shelter (*Must meet the International Code Council National Storm Shelter Association Standard for the Design and Construction of Storm Shelters (ICC-500 August 2008) Standards*)
- Outdoor Fitness Activity Area (*Must provide 3 separate types of commercial grade outdoor fitness equipment with a minimum of 3 exercise activities. An instructional sign on the usage of fitness equipment must be located by each type of fitness equipment*)

4 Points will be given to each of the following amenities:

- Computer center (two or more computers with printer and internet access)
- Splash Center (at least 500 square feet) which includes at a minimum a spray zone and pad and 3 above ground water features
- Exercise/Fitness room with equipment (Room must be no less than 144 square feet and provide a minimum of 3 separate types of commercial grade exercise/fitness equipment)
- Covered bus stop shelter (minimum 6' wide by 12' long) with 2 fixed bench seating underneath same cover (Must be separate/independent of the mail kiosk unless location allows for proper access of bus to pick-up and drop off)
- Access Gate (Must be on all entry points of project if more than one)
- Walking Trail with Benches (5 feet wide concrete and minimum of ¼ of mile long) (Must be separate from required sidewalks)

2 Points will be given for each of the following extra amenities:

- Basketball court (Must have break-away rim and shatter-proof backboard)
- Picnic area (minimum of 168 square feet of concrete slab for each picnic table) with grills (1 grill (permanently fixed) 1 picnic table with attached bench seating for every 14 units proposed in the project). Rooftop area with 1 picnic table with attached bench seating for every 14 units proposed in the project.
- Storm doors (Must be aluminum construction)
- Emergency Pull Cord/Call Button (Minimum of 1 in each unit)
- Attached bike rack (1 per building including the community building) (Rack must be permanently installed on concrete in such a way that sidewalk traffic is not impeded)
- Gazebo (Minimum 16' x 16') (Minimum of 1 picnic table with attached bench seating)

Type of Construction (Maximum of 8 Points)

4 points will be given for storm windows; thermal break insulated windows or extruded vinyl windows and insulated exterior doors. Windows must be Energy Star Rated.

4 points will be given for full brick/cementitious siding, stucco, cultured stone or concrete masonry unit (CMU) products (*No Exterior Insulation Finishing System is acceptable*).

Multifamily units (*two or more units in a building*)

A minimum of 40% of each building, defined as the exterior façade from finished grade elevation to eave line, shall be brick. The remaining 60% can be cementitious siding, stucco, or CMU products. The CMU products must be decorative, textured, patterned, color core, or painted.

All entry areas into the apartment (including covered breezeways, porches, balconies, and patios) must have brick, cementitious siding, stucco, cultured stone, or CMU to be considered full brick.

Single-family units (*single unit/detached building*)

A minimum of 50% of the building, defined as the exterior façade from finished grade elevation to eave line, shall be brick. Each exterior wall must contain brick up to the bottom of the first-floor windows on a two-story unit or the windowsill of a one-story unit. The remaining 50% can be cementitious siding, stucco, cultured stone, or CMU products. The CMU products must be decorative, textured, patterned, color core, or painted.

Energy/Water Conservation and Healthy Living Environment (Maximum of 10 Points)

3 Points will be given for each of the following:

- HVAC of 15 SEER (HSPF 9.0) or above.
- Energy Star rated “cool roof” shingles or metal roof with a fifty (50) year warranty.

2 Points will be given for each of the following:

- Kitchen range hood ventilation to be vented to the exterior and equipped with a damper.

- EPA’s Partnership Program “WaterSense” labeled water closet, bathroom faucets and showerheads.

1 Point will be given for each of the following:

- Low Volatile Organic Compounds (VOC) wall finishes (maximum VOC levels of 50 grams/liter).
- Low VOC flooring finishes (maximum VOC levels of 100 grams/liter).
- Energy Star rated LED lighting in the kitchen.

Rent Affordability (Maximum of 10 Points)

New Funds. A maximum of 5 points in aggregate will be given to projects which have a commitment for new funds. Regardless of whether the funds are loaned (required repayment) or granted to the project, 100% of the total amount of funds committed for points must be a permanent source of funds. To qualify for these points, the application must include a fully executed firm commitment from the entity that will loan or grant funds to project. Up to 5 points will be given to projects as follows:

- 5 points – \$10,000+ per unit
- 4 points – \$5,000 – 9,999 per unit
- 3 points – \$2,000 - 4,999 per unit

Rental Assistance. A maximum of 5 points will be given to projects that have a commitment for federal, state, or local project-based and/or voucher(s) for rental assistance so that rents are affordable.

Location (Maximum of 20 Points)

Points Gained for Site Selection

Tenant Supportive Services Location (6 Points)

6 points will be given to a:

- a project that is located within 5 miles of a supportive service provider; or
- a project having a Service Agreement/MOU with a service provider (regardless of service provider office location) for the provision of onsite services for the project's Qualifying Populations for the duration of the compliance period.

Neighborhood Services (Maximum of 10 Points)

2 points will be given for each of the following neighborhood services located within 3 miles of the site. Distance will be measured by odometer from the automobile entrance of the proposed project site to the closest automobile entrance to the parking lot of the applicable neighborhood service. Projects located in a federally declared disaster county may receive points for neighborhood services if the neighborhood service is currently under construction and funded in whole or part by Federal or State disaster funds. Existing multifamily projects, located in rural areas, may submit the best option available for the grocery store (i.e., Dollar General, convenience store, etc.). The applicant must provide sufficient evidence of both requirements. Duplicate neighborhood services will not be eligible for additional points. Points will only be given for the

neighborhood services listed below. If AHFA cannot locate a service due to incorrect directions, 1 point will be deducted for each service where incorrect directions are provided. Refer to the Application Site/Project Information Form for instructions on providing directions from site, and a general definition of services eligible for points.

- | | |
|---------------------------|------------------------|
| Grocery Store | Pharmacy or Drug Store |
| Convenience Store | Bank or Credit Union |
| Hospital or Doctor Office | |

Census Tract Location (Maximum of 4 points)

A maximum of 4 points will be given to a project located in a Census Tract where the 2020 Estimate Tract Median Family Income from the Federal Financial Institutions Examination Council (FFIEC) Census and Demographic Data is equal to or higher than the following percentages (rounded down) of the county’s 2021 Median Family Income published by HUD:

- 1 point – 60% to less than 100%
- 2 points – 100% or more

Points Deducted for Site Selection

Negative Neighborhood Services (No Maximum)

There is not a limit on the number of points that can be deducted for negative neighborhood services. The following deductions will be taken:

- 5 points will be deducted for applications involving any other project that is adjacent to any incompatible use listed below. Adjacent is defined as nearby, but not necessarily touching. The following list of incompatible uses is not all inclusive. (Refer to Negative Neighborhood Services as defined in the Application Instructions)

- | | |
|--|----------------------|
| Junk yard or dump | Pig or chicken farm |
| Salvage yard | Processing plant |
| Wastewater treatment facility | Industrial |
| Distribution facility | Airport |
| Electrical utility Substation | Prison or Jail |
| Railroad | Solid waste disposal |
| Adult video/theater/live entertainment | |

*Please note: Points will not be deducted for properties located adjacent to a railroad if the noise levels are acceptable (outside noise level < 65 dB; interior noise level < 45 dB). The applicant must submit a noise level assessment with the application for points not to be deducted automatically.

If a project is not adjacent to one of the above incompatible uses, the following deductions will be taken:

- 2 points will be deducted for applications involving any other project that is within .3 miles of any incompatible use listed below. The list is not all inclusive.

- | | |
|-------------------------------|----------------------|
| Junk yard or dump | Pig or chicken farm |
| Salvage yard | Processing plant |
| Wastewater treatment facility | Airport |
| Prison or Jail | Solid waste disposal |

Points will not be deducted for a prison, jail, or detention facility if it is co-located with a police station or similar law enforcement office.

Accessibility (Maximum of 2 points Deducted)

2 points will be deducted if the condition of the streets and sidewalks are unsatisfactory. The width of the streets and the difficulty of access to the proposed site will be taken into consideration.

Applicant Characteristics (Maximum of 35 Points)

Minority or Women Owned (Maximum of 10 Points)

10 points will be given to applicants with participation of minorities or women owned. To qualify for the points for participation of minorities or women, the application must meet one of the following requirements:

- Minorities or women have ownership in the Ownership Entity or any Responsible Owner; or
- Applicant guarantees at least 20% of the total building cost is awarded to minority- or women-owned businesses.

In all cases, the minority or female individual(s) must serve as the general partner, manager or managing member of the Ownership Entity or Responsible Owner, must have at least a 50% ownership interest in the Ownership Entity or Responsible Owner, or must have at least 50% ownership interest in the participating business to qualify for the points. These businesses include, but are not limited to, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services. The name and address of the company and the anticipated contract amount must be listed at the time of application on the form provided by AHFA in the Application Package to receive the points.

Affordable Rental Housing Owner/Developer (5 Points)

5 points will be given to Ownership Entities with a Responsible Owner that currently owns and has previous successful experience in development in either of the following:

- Active AHFA Projects that received a Housing Credit Reservation Letter or HOME Written Agreement in 2000 or later (100+ units or 2+ projects); or
- Active Non-AHFA Projects that were Placed in Service in 2006 or later. The Ownership Entity must list each Non-AHFA Project on the Responsible Owner's AHFA Schedule of Real Estate Owned included in the application (500+ units or 5+ projects).

The Responsible Owner may include experience gained as a Responsible Owner in another firm, but not as an employee of another firm. Applicants must currently own the properties listed for development points.

All points relating to Applicant Characteristics will be awarded to the Ownership Entity identified in the application based on the characteristics of (a) for a for-profit Ownership Entity, its

Responsible Owners who are individuals, and (b) for non-profit Ownership Entities, the Ownership Entity itself.

Qualifying Population Advocate (5 Points)

5 points will be given to an entity that has an established history for advocating for the specific qualifying population group proposed in the application. To qualify for the points the entity must be a Responsible Owner in the Ownership Entity proposed in the application. An affordable rental housing owner/developer may also qualify for these points if they have an established history providing for the proposed qualifying population in the application.

Supportive Services Provider(s) (5 Points)

Supportive Services Provider(s) (Up to 10 Points)

A maximum of 10 points will be given for comprehensive services provided by a Supportive Service Provider(s) (Provider):

- 10 points for 3 services as defined in this section, or
- 7 points for 2 services as defined in this section

The responsibilities of the Provider are clearly defined, providing ongoing services to Qualifying Population tenants in a HOME-ARP project evidenced by a Services Agreement or MOU between the Owner and the Provider which is eligible to be renewed annually for the duration of the compliance period of the HOME-ARP project. Providers will serve QP tenants in at least of one the following:

- Child Care
- Counseling
- Family/Independent Living Counselling
- Financial Literacy Counselling
- Food Services
- Job Training/Counselling
- Mental Health Services/Counselling
- Occupational Therapy
- Rehabilitation/Physical Therapy
- Substance Recovery/Counselling
- Transportation Services

Affordable Rental Housing Management (10 points)

10 points will be given to an applicant with an experienced managing agent of low -income multifamily housing. This experience is defined by the highest number of units or projects (with at least 20% of the units being considered low- income) currently managed. Only those units in projects that are considered low-income units will be counted in this total.

- 10 points = (100+ units or 2+ projects)

POINTS LOST (No Maximum)

In addition to the points gained, each application submitted by an Ownership Entity may be subject to point deductions. Point deductions resulting from each existing AHFA-Project (approved and/or Placed in Service) will be based on AHFA's HOME-ARP Allocation Plan for the applicable year and will cover all non-compliance with AHFA documents, executed agreements, audits and inspections that is identified during the period from January 1st through December 31st of the year immediately preceding the current HOME-ARP Allocation Plan year. Point deductions for non-compliance identified between January 1st and December 31st of each year will consider whether the Ownership Entity or other Responsible Owner completes corrective actions, follow up inspections or other verification of compliance within the deadline required by AHFA, even if the deadline falls after December 31st of such year. Points lost will be assessed based on the following criteria:

Existing AHFA- Project(s) Approved and/or Placed-In-Service (No Maximum)

- 1) 5 points (for each occurrence) will be deducted from an application if any Responsible Owner of the Ownership Entity altered an approved project in any manner different from the approved project's original application without prior written consent from AHFA.
- 2) 5 points (for each occurrence) will be deducted from an application if any Responsible Owner of the Ownership Entity or the Management Company identified in the application is not in compliance with and/or has any uncured failure to meet a requirement specifically listed in any AHFA document(s), the AHFA HOME Loan Restructuring Policy or any applicable agreement(s) without prior written consent from AHFA.
- 3) 2 points (for each occurrence) will be deducted from an application if any Responsible Owner of the Ownership Entity or the Management Company identified in the application for any of the following with respect to Davis Bacon requirements on any AHFA-Project (approved and/or Placed in Service):
 - No response on outstanding issues for over 6 months
 - The general contractor is unable to submit payrolls, causing an escrow account to be established
 - Outstanding issues remain over 2 years from the date of the notice to proceed
 - Failure to provide AHFA the Section 3 report on the required date
 - Failure to provide AHFA the HUD 2516 report on the required date

Non-Compliance after the Initial On-Site Inspection (No Maximum)

Applications are subject to point deductions for failure to comply with the Compliance Requirements as outlined in "Addendum D - Compliance Monitoring Procedures, Requirements, Penalties and Suspension Criteria" attached to AHFA's 2021 HOME Action Plan.

Applications with Responsible Owners that have non-AHFA Projects, whether in the State and/or out-of-State, will be subject to the same AHFA requirements defined in "Addendum D - Compliance Monitoring Procedures, Requirements, Penalties and Suspension Criteria" attached to AHFA's 2021 HOME Action Plan. The 4-point threshold in such Addendum D does not apply to non-AHFA Project(s).

Exhibit F-2
Alabama Housing Finance Authority's
HOME-ARP Summary of Proposed Changes from Public Comments

Section	Page Reference*	Section Name	Description of Change(s)
V	13	Use of HOME-ARP Funding	Use of HOME-ARP Funding. AHFA may allocate HOME-ARP funds to an approved project in one of following ways: 1. As a forgivable grant. Repayment of a grant of HOME-ARP funds will be forgiven entirely (but never in part) if the funded Project remains in compliance with HOME-ARP and AHFA requirements for the entire HOME-ARP Affordability Period. 2. A loan. The HOME-ARP loan will bear an interest rate of one-half of one percent (1/2%) accrued annually with all principal and accrued interest payments due at the end of the 15th year. In the event of default, AHFA reserves the right to set a default rate more than the prevailing Prime Lending Rate applicable at the time of default.
V	17	Extra Amenities	Based on comments, the following amenities were added for points: <ul style="list-style-type: none"> - Basketball court - Picnic area - Storm doors - Emergency Pull Cord/Call Button - Attached bike rack - Gazebo
Point Scoring	19	Tenant Supportive Services Location	This section was modified to reflect the following options: A - 6 points will be given to a project that is located within 5 miles of a supportive service provider. or B - 6 points will be given to a project having a Service Agreement/MOU with a service provider (regardless of service provider office location) for the provision of onsite services for the project's Qualifying Populations for the duration of the compliance period.
Point Scoring	19 & 20	Census Tract Location	In response to comments, we broadened the scoring for Census Tract Location.
Point Scoring	22	Supportive Service Providers: Case Management	The points for this section were modified based on comments: A maximum of 10 points will be given for providing comprehensive services by Supportive Service Providers (Provider). <ul style="list-style-type: none"> - 10 points for 3 Services - 7 points for 2 Services

*Referenced pages were based on the draft versions of the Plans presented on the AHFA website.

Page references in final version of the Plans may not coincide with those in the draft versions.

**Exhibit F-2
Alabama Housing Finance Authority's
HOME-ARP Public Participation Process Documentation**

Alabama Media Group
P O Box 2488
Mobile, AL 36652-2488



Press Register

ALABAMA HOUSING FINANCE AUTH
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MONTGOMERY, AL 36124

AD#:0010367883

Sales Rep: Cristy Boyington
Account Number:2030789
AD#: 0010367883

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Page 1 of 2

Date	Position	Description	P.O. Number	Costs
06/29/2022	Notice of Bid AL	Notice of Public Hearing Regarding DRAFT AHFA 2023 Low-Income		
			Ad Size 1 x 56 L	Basic Ad Charge - 06/29/2022 \$119.42
				Total \$119.42

**Exhibit F-2
Alabama Housing Finance Authority's
HOME-ARP Public Participation Process Documentation**



AL Legal Liner

Press Register
LEGAL AFFIDAVIT

AD#: 0010367883

Total \$119.42

State of Alabama,) ss
County of Mobile)

Catherine Copas being duly sworn, deposes that he/she is principal clerk of Alabama Media Group; that Press Register is a public newspaper published in the city of Mobile, with general circulation in Mobile County, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

Press Register 06/29/2022

Catherine Copas

Principal Clerk of the Publisher

Sworn to and subscribed before me this 30th day of June 2022

Juanita DePuy

Notary Public



PRESS REGISTER
June 29, 2022

Notice of Public Hearing Regarding
DRAFT AHFA 2023 Low-income Housing
Credit Qualified Allocation Plan, HOME An-
nual Action Plan, and National Housing Trust
Fund Allocation Plan, and Draft HOME-
America Rescue Plan

Notice is hereby given that Alabama Housing
Finance Authority (AHFA) will conduct a
public hearing concerning the proposed
2023 Low-income Housing Tax Credit Quali-
fied Allocation Plan, HOME Action Plan, and
National Housing Trust Fund Allocation Plan
(Plans) for the distribution of funds in ex-
change for the new construction of ex-
tremely low-, low-, and moderate-income
projects and the monitoring of the funding
for those projects.

Additionally, AHFA will present the HOME-
American Rescue Plan, a significant amend-
ment to the 2021 HOME Action Plan for the
distribution of funds in exchange for the new
construction of extremely low-, low-, and
moderate-income projects for Qualifying
Populations and the monitoring of the fund-
ing for those projects.

The public hearing will be held on Thursday,
July 14, 2022, at 10:00 a.m., Central Daylight
Time, at the HOME Builders Association of
Alabama located at 7515 Halcyon Summit
Drive, Montgomery, Alabama, 36107. All at-
tendees must comply with COVID-19 protec-
tion measures in accordance with state, lo-
cal, and venue requirements. Attendees who
wish to speak must register to do so upon
arrival at the venue.

Release of the proposed 2023 Plans, HOME-
ARP Plan, and associated Commit Form is
pending.

ADA and EQUAL OPPORTUNITY COMPLIANCE
STATEMENT

If you need accommodations for physical
mobility, sensory impairment or language
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(334) 244-9200. Notification 48 hours prior
to the meeting will enable the AHFA to make
reasonable arrangements to ensure accessi-
bility to the meeting.

Si necesita adaptaciones para la movilidad
física, la discapacidad sensorial del lenguaje
debe participar en la reunión, comuníquese
con el AHFA al (334) 244-9200. La
notificación 48 horas antes de la reunión
permitirá al AHFA hacer arreglos razonables
para garantizar la accesibilidad a la reunión.
Si necesita adaptaciones para problemas
sensoriales o del lenguaje para revisar el
documento, comuníquese con el AHFA.

Exhibit F-2
Alabama Housing Finance Authority's
HOME-ARP Public Participation Process Documentation

Alabama Media Group
P O Box 2488
Mobile, AL 36652-2488



The Huntsville Times

ALABAMA HOUSING FINANCE AUTH
PO BOX 242967
MONTGOMERY, AL 36124

AD#:0010368022

Sales Rep: Debbie Childers
Account Number:2030789
AD#: 0010368022
Alabama Media Group
Dept 77571
P.O. Box 77000
Detroit, MI 48277-0571

FOR QUESTIONS CONCERNING THIS AFFIDAVIT,
PLEASE CALL DEBBIE CHILDERS AT 205-325-2133 OR EMAIL LEGALS@AL.COM

Page 1 of 2

Date	Position	Description	P.O. Number	Costs
06/29/2022	Legals AL	Notice of Public Hearing Regarding DRAFT AHFA 2023 Low-Income	Public Hearing ad	
			Ad Size 1 x 56 L	
				Basic Ad Charge - 06/29/2022 \$207.20
				Total \$207.20

**Exhibit F-2
Alabama Housing Finance Authority's
HOME-ARP Public Participation Process Documentation**



AL Legal Liner

The Huntsville Times

LEGAL AFFIDAVIT

AD#: 0010368022

Total

\$207.20

State of Alabama,) ss
County of Madison)

Catherine Copas being duly sworn, deposes that he/she is principal clerk of Alabama Media Group; that The Huntsville Times is a public newspaper published in the city of Huntsville, with general circulation in Madison County, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

The Huntsville Times 06/29/2022

Principal Clerk of the Publisher

Sworn to and subscribed before me this 30th day of June 2022

Notary Public



Notice of Public Hearing Regarding
DRAFT AHFA 2023 Low-Income Housing
Credit Qualified Allocation Plan, HOME
Annual Action Plan, and National Housing
Trust Fund Allocation Plan, and Draft
HOME-American Rescue Plan

documento, comuníquese con el AHFA.
Huntsville Times: June 29, 2022

Notice is hereby given that Alabama Housing Finance Authority (AHFA) will conduct a public hearing concerning the proposed 2023 Low-Income Housing Tax Credit Qualified Allocation Plan, HOME Action Plan, and National Housing Trust Fund Allocation Plan (Plans) for the distribution of funds in exchange for the new construction of extremely low-, low-, and moderate-income projects and the monitoring of the funding for those projects.

Additionally, AHFA will present the HOME-American Rescue Plan, a significant amendment to the 2021 HOME Action Plan for the distribution of funds in exchange for the new construction of extremely low-, low-, and moderate-income projects for Qualifying Populations, and the monitoring of the funding for those projects.

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Release of the proposed 2023 Plans, HOME-ARP Plan, and associated Comment Form is pending.

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Exhibit F-2
Alabama Housing Finance Authority's
HOME-ARP Public Participation Process Documentation

Alabama Media Group
P O Box 2488
Mobile, AL 36652-2488



The Birmingham News

ALABAMA HOUSING FINANCE AUTH
PO BOX 242967
MONTGOMERY, AL 36124

AD#:0010367584

Sales Rep: Nancy Bridgman
Account Number:2030789
AD#: 0010367584

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PLEASE CALL NANCY BRIDGMAN AT 205-325-3306 OR EMAIL LEGALS@AL.COM

Remit Payment to:
Alabama Media Group
Dept 77571
P.O. Box 77000
Detroit, MI 48277-0571

Page 1 of 2

Date	Position	Description	P.O. Number	Costs
06/29/2022	Legals AL	Notice of Public Hearing Regarding DRAFT AHFA 2023 Low-Income	Public Hearing	
			Ad Size 1 x 111 L	
				Basic Ad Charge - 06/29/2022 \$305.25
				Total \$305.25

Exhibit F-2
Alabama Housing Finance Authority's
HOME-ARP Public Participation Process Documentation



AL Legal Liner

The Birmingham News

LEGAL AFFIDAVIT

AD#: 0010367584

Total

\$305.25

State of Alabama,) ss
 County of Jefferson)

Catherine Copas being duly sworn, deposes that he/she is principal clerk of Alabama Media Group; that The Birmingham News is a public newspaper published in the city of Birmingham, with general circulation in Jefferson County, and this notice is an accurate and true copy of this notice as printed in said newspaper, was printed and published in the regular edition and issue of said newspaper on the following date(s):

The Birmingham News 06/29/2022

Principal Clerk of the Publisher



Sworn to and subscribed before me this 30th day of June 2022

Notary Public

Notice of Public Hearing Regarding
 DRAFT AHFA 2023 Low-Income Housing
 Credit Qualified Allocation Plan, HOME
 Annual Action Plan, and National Housing
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 DRAFT AHFA 2023 Low-Income Housing
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Bham News: June 29, 2022

Exhibit F-2
Alabama Housing Finance Authority's
HOME-ARP Public Participation Process Documentation



Daily-Montgomery, Montgomery County, AL

TO: ALABAMA HOUSING FINANCE
7460 HALCYON POINTE DR STE 200
MONTGOMERY, AL 36117

of Affidavits: 1
This is not an invoice

E-Verify#: DHS72179

PROOF OF PUBLICATION

State of Alabama
County of Montgomery:

Before the undersigned authority personally appeared said Legal Clerk who on oath, says that he/she is a personal representative of the *Montgomery Advertiser*, a daily newspaper published in Montgomery, Alabama: that the attached copy of advertisement, being a Legal in the matter of:

Ad Number: 0005310580

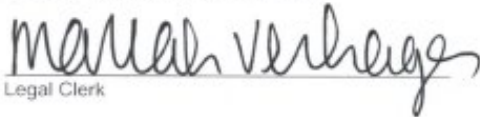
Was Published in said newspaper in the issue(s) dated:

MGM-Montgomery Advertiser

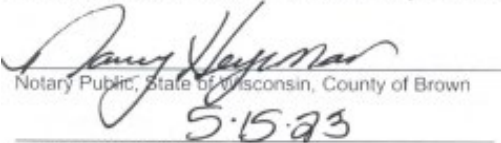
06/29/2022

Affiant further says that the said *Montgomery Advertiser* is a newspaper published in said Montgomery County, Alabama, and that the said newspaper has heretofore been published in said Montgomery County, Alabama, and has been entered as second class matter at the Post Office in said Montgomery County, Alabama, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

Now due on said account is \$214.62


Legal Clerk

Subscribe and sworn before me this 29th day of June, 2022


Notary Public, State of Wisconsin, County of Brown
5.15.23
My Commission expires

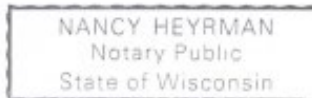


Exhibit F-2
Alabama Housing Finance Authority's
HOME-ARP Public Participation Process Documentation

Re: 7.14 hearing

Notice of Public Hearing Regarding
DRAFT AHFA 2023 Low-Income Housing
Credit Qualified Allocation Plan, HOME
Annual Action Plan, and National Housing
Trust Fund Allocation Plan, and
Draft HOME-American Rescue Plan

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Attendees who wish to speak must reg-
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Si necesita adaptaciones para proble-
mas sensoriales o del lenguaje para
revisar el documento, comuníquese con
el AHFA.
Mont. Adv. 6/29/2022
0005-007580

Exhibit F-2
Alabama Housing Finance Authority's
HOME-ARP Public Participation Process Documentation



NOTICE 23-02

June 30, 2022

Public Hearing Regarding
DRAFT AHFA 2023 Low-Income Housing Credit Qualified
Allocation Plan, HOME Annual Action Plan, and
National Housing Trust Fund Allocation Plan, and
Draft HOME-American Rescue Plan

Notice is hereby given that Alabama Housing Finance Authority (AHFA) will conduct a public hearing concerning the proposed [2023 Low-Income Housing Tax Credit Qualified Allocation Plan, HOME Action Plan, and National Housing Trust Fund Allocation Plan \(Plans\)](#); Additionally, AHFA will present the [HOME-American Rescue Plan](#), a significant addendum to the 2021 HOME Action Plan for the distribution of funds in exchange for the new construction of extremely low- and moderate-income projects for Qualifying Populations and the monitoring of the funding for those projects.

The public hearing is scheduled for Thursday, July 14, 2022, at 10:00 a.m., Central Daylight Time, at the [HOME Builders Association of Alabama](#) at 7515 Halcyon Summit Drive, Montgomery, Alabama 36117. All attendees must comply with COVID-19 protection measures in accordance with state, local, and venue requirements. Attendees who wish to speak must register upon arrival at the venue.

The proposed Plans and 2023 Comment Form are available for download at www.ahfa.com. All other requests for copies must be

submitted in writing to the attention of the Multifamily Division of Alabama Housing Finance Authority, P.O. Box 242967, Montgomery, Alabama 36124-2967 or 7460 Halcyon Pointe Drive, Suite 200 Montgomery, AL 36117. All interested parties are invited to submit written or oral comments at the public hearing regarding the proposed Plans. AHFA must receive all written comments by 5:00 p.m. CDT on August 15, 2022. Any person desiring to present oral statements should appear at the public hearing.

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Alabama Housing Finance Authority | www.AHFA.com



Exhibit F-2
Alabama Housing Finance Authority's
HOME-ARP Public Participation Process Documentation



NOTICE 23-03

August 4, 2022

REMINDER

for Public Comments on
**DRAFT AHFA 2023 Low-Income Housing Credit Qualified
Allocation Plan, HOME Annual Action Plan, and
National Housing Trust Fund Allocation Plan, and
Draft HOME-American Rescue Plan**

The Public Commenting Period on the proposed 2023 Low-Income Housing Tax Credit Qualified Allocation Plan, HOME Action Plan, National Housing Trust Fund Allocation Plan (Plans), and the HOME-American Rescue Plan, a significant addendum to the 2021 HOME Action Plan, will close on **August 15, 2022, at 5:00 p.m. CDT.**

The proposed Plans and 2023 Comment Form are available for download at www.ahfa.com. All other requests for copies must be submitted in writing to the attention of the Multifamily Division of Alabama Housing Finance Authority, P.O. Box 242967, Montgomery, Alabama 36124-2967 or 7460 Halcyon Pointe Drive, Suite 200 Montgomery, AL 36117.

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Alabama Housing Finance Authority | www.AHFA.com



Alabama Housing Finance Authority | P.O. Box 242967, Montgomery, AL 36124-2967

[Unsubscribe communications@ahfa.com](mailto:Unsubscribe.communications@ahfa.com)

[Update Profile](#) | [Constant Contact Data Notice](#)

Exhibit F-3
Alabama Housing Finance Authority's
HOME-ARP Additional Consultations – January 2023

From: [Houlditch, Dondra](#)
Cc: [Young, David](#); [Hert, Chris](#); [Little, Jeff](#)
Bcc: [lhobbs@cafhc.org](#); [lila11343@aol.com](#); [ofcadmin@alhaacp.org](#); [tim@thearcofal.org](#); [fpettway@alsp.org](#); [dspencer@birminghamul.org](#)
Subject: HOME-ARP Review
Date: Friday, January 20, 2023 10:43:00 AM
Importance: High

In January 2022, AHFA began the process of seeking input for the development of the initial [HOME-America Rescue Plan \(HOME-ARP\) allocation plan](#). The HOME-ARP funds represents an investment in housing and other assistance for Qualifying Populations (QPs) of Alabama residents experiencing homelessness or housing insecurity. Input was received from Continuum of Care (CoC), homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of QPs, and public private organizations that address the needs of persons with disabilities to determine a baseline for the draft HOME-ARP Plan. The draft Plan was published for review and public comment July 14, 2022. Revisions were made based on that Public Participation Process, and the HOME-ARP Plan was submitted for HUD review in October 2022. HUD has requested that AHFA conduct additional outreach with your organization.

Please review the [draft HOME-ARP Plan](#), including the consultation and [Public Participation Process](#) and provide any input to AHFA **by February 3, 2023**. If you do not have any additional input to the Plan, please respond indicating such.

If you have questions or want to schedule a call to discuss this, please contact David C. Young, AHFA Multifamily Division Administrator, [via email](#) or phone at (334)244-9200.

Thank you,
-DH

Exhibit F-3
Alabama Housing Finance Authority's
HOME-ARP Additional Consultations – January 2023

HUD Identified Category	Organization Outreach	Contact	Email	Phone	Address	City	Zip	Organization Initiatives	Notes
Fair Housing Initiatives Program (FHIP) organization	Central Alabama Fair Housing Center	Kimberly Hobbs, Executive Director	khobbs@cafhc.org	334-263-4663	2867 Zelda Road	Montgomery	36106	Education and Outreach Initiative (EOI) Private Enforcement Initiative (PEI)	1/13/2023 No answer, left message 1/30 Spoke to Kim Hobbs, she plans to provide input. 1/13/2023 No answer, left message; 1/18/2023 No answer, left message; 1/20/2023 No answer, left message; 1/23/2023 sent follow-up email; 1/30 left voicemail @2:39; 1/31 left message @2:14.
	Mobile Fair Housing Center		complaints@sacfh.org	251-479-1532	PO Box 161202	Mobile	36616	Private Enforcement Initiative (PEI)	1/20 Sent Plan to Executive Director; 1/30 left message @ 2:41; 1/31 spoke to Lila Hackett who said she will email David with "no comment"
	Fair Housing Center of Northern Alabama	Lila Hackett, Executive Director	lila11343@aol.com	205-324-0111	1728 3rd Ave N, #400C	Birmingham	35203	Private Enforcement Initiative (PEI)	
Fair Housing Assistance Program (FHAP) agency	No Office in Alabama								
NAACP	NAACP Alabama State Conference	Bernard Simelto	afcadmin@alnaacp.org; president@alnaacp.org	256-444-1300	PO Box 866	Athens	35612		1/13/2023 Left message that we will be sending Plan for review and input; 1/30 spoke to receptionist who said they would call back; 1/31 spoke to Bernard Simelto who will review the plan - resent email to additional email address.
Legal Aid	Legal Services Alabama, Inc.	Felicia Pettway	fpettway@alisp.org	866-456-4995	PO Box 20787	Montgomery	36120	Legal Services Corporation	1/13/2022 No answer - no option to leave message; 1/20/2023 waited on hold for 25 min. request call back; 1/30 no option to leave message; 1/31 left message for FP at 334-223-0232; 1/31 @ 2:34 spoke to Felicia who will circulate plan and send us a response.
The ARC local chapters	The ARC of Alabama		tim@hearcofal.org	334-262-7688	557 S. Lawrence Street	Montgomery	36104		1/30 Left message @ 2:50; 1/31 left message at 2:12.
Additional Outreach	Birmingham Urban League	Deborah Spencer	dspencer@birminghamul.org	205-326-0162	2101 6th Ave N, Ste. 700	Birmingham	35203		1/19/2023 Left message; 1/20/2023 Left message; 1/30 mailbox full; 1/31 left message.

Exhibit F-3
Alabama Housing Finance Authority's
HOME-ARP Additional Consultations – January 2023



CENTRAL ALABAMA FAIR HOUSING CENTER

2867 Zeldia Road • Montgomery, Alabama 36106 • (334) 263-4663 • Fax (334) 263-4664
www.centralalabamafairhousing.org

February 3, 2023

Ms. Dondra Houlditch, AFHA

Sent Via E-mail

Dear Ms. Houlditch:

Please consider this as the Central Alabama Fair Housing Center's response to your January 20, 2023 email requesting our comments on the proposed HOME-ARP Review and accompanying Public Participation Process. Because of the limited time we have had to review these documents, we are not in a position to fully analyze the plans.

It is our understanding from reading the documents that the majority, if not all, of the additional ARP fund (\$41,000,000+) will be used to create approximately 100 new affordable housing units. We have not seen any evidence that a fair housing review of the plan has been conducted to date. If we are incorrect about this, please let us know. It is very important that a fair housing analysis of all AHFA plans and projects be completed and incorporated into all future planning at all stages. The Fair Housing Act requires that governmental agencies consider the impact of their decisions on protected classes under the Fair Housing Act and that they take appropriate actions to affirmatively further fair housing. This requirement includes, among other considerations, promoting racially integrated neighborhoods and assisting people with disabilities to live independently.

Given the limited time for review, we are not able to consider whether the plan will affirmatively further fair housing, although there is a dire need for additional affordable housing of any type in Alabama. Both documents included very helpful suggestions from developers and non-profit organizations. For example, the suggestion of one of the commenters to include "tiny homes" as a part of the plan is interesting because these homes are cost effective and could potentially house a larger number of people affordably. An analysis of zoning regulations throughout Alabama's many jurisdictions would be helpful to determine what additional types of housing can be supported in the future and what zoning changes are needed to affirmatively further fair housing. We believe that a fair housing analysis should still be conducted before selecting the final sites and developments to be funded with these ARP funds.

Based on past experience, we would like to note that all AHFA procedures for new developments should be reviewed to address NIMBY objections to new affordable housing developments. We recall situations where local mayors or other governmental entities have successfully rejected planned affordable housing developments based on local opposition clearly based on race or disability discrimination. We, along with the two other fair housing centers in Alabama, are available and willing to work with AFHA in the future to review plans and procedures to ensure that AHFA developments promote all of the goals of the Fair Housing Act.

"It is not possible to be in favor of justice for some people and not be in favor of justice for all people." — Dr. Martin Luther King Jr.

Exhibit F-3
Alabama Housing Finance Authority's
HOME-ARP Additional Consultations – January 2023



CENTRAL ALABAMA FAIR HOUSING CENTER

2887 Zelda Road • Montgomery, Alabama 36108 • (334) 263-4663 • Fax (334) 263-4664

www.centralalabamafairhousing.org

Sincerely yours,

/s/ Faith R. Cooper
Associate Director

"It is not possible to be in favor of justice for some people and not be in favor of justice for all people." — Dr. Martin Luther King Jr.

Exhibit F-3
Alabama Housing Finance Authority's
HOME-ARP Additional Consultations – January 2023

From: lila11343@aol.com
Sent: Thursday, February 16, 2023 12:05 PM
To: Young, David
Cc: Houlditch, Dondra
Subject: Re: HOME-ARP Review

Hi David,

Please accept my apology for taking so long to respond. I have thoroughly reviewed your attached document, HOME-ARP Review, and find it to accurately reflect the needs of the population your program targets. Insufficient housing for low-income elderly, in particular, is a great problem in this state and needs to be addressed. I noticed several references in the review to this and other areas we are very familiar with here at the center based upon the many fair housing complaints we receive.

If I can be of further service, please do not hesitate to contact me.

Lila

Lila Hackett
Executive Director
Fair Housing Center of Northern Alabama

From: Felecia Pettway <fpettway@alsp.org>
Sent: Tuesday, January 31, 2023 3:54 PM
To: Houlditch, Dondra
Cc: Young, David; Hert, Chris; Little, Jeff
Subject: RE: HOME-ARP Review

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Dondra,

Attached is my input. Please let me know if anything else is needed.

Felecia

Agency	Type of Org	Method of Consultation	Feedback
Legal Services Alabama	A 501c provides free civil legal aid	1. Phone 2. Virtual 3. In-person 4. Email	1. Represent clients in eviction cases 2. Negotiate Settlement agreements 3. Secure funding from AHFA to prevent homelessness. 4. Provide Outreach Services for clients facing homelessness.

Felecia Pettway, Esq.
 Director of Development
 Pronouns: She, Her, Hers
 Legal Services Alabama - Central
 Voice / Fax / Text: 334-223-0232
 2567 Fairlane Drive, Suite 300, Montgomery, AL, 36116
 P.O. Box 20787, Montgomery, AL, 36120
fpettway@alsp.org
<https://www.legalservicesalabama.org>

DONATE TODAY



Exhibit F-3
Alabama Housing Finance Authority's
HOME-ARP Additional Consultations – January 2023

From: Kecia Hendrix <kecialetoi@yahoo.com>
Sent: Friday, February 3, 2023 1:57 PM
To: Benard <bsimelton@aol.com>; Little, Jeff <jlittle@AHFA.COM>
Cc: Young, David <DYoung@AHFA.COM>; Hert, Chris <CHert@AHFA.COM>
Subject: Re: HOME-ARP Review

You don't often get email from kecialetoi@yahoo.com. [Learn why this is important](#)

The AL State Conference Economic Empowerment Programs do not have any more revisions to the HOME-ARP plan and distribution at this time, but we would like to be included in the decisions and to know what percentiles of the distribution to poverty and underserved Black American Citizens.

"What you do on earth echoes in
heaven"
Hendrix

Kecia L.

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On Feb 3, 2023, at 13:54, Kecia Hendrix <kecialetoi@yahoo.com> wrote:

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On Jan 31, 2023, at 15:15, Benard <bsimelton@aol.com> wrote:

Kecia,
Can you review this and provide any comments. This is Ms Beck's area, but I know you and she collaborated on issues from time to time. I need any feedback by Thursday.

Thanks,

Benard