

## **HOME-ARP Funding Round 3**

Jason Hall | HOME-ARP Program Manager lowa Finance Authority

#### **Webinar General Information**

This session will be recorded and posted to our website.

If you have a question during the webinar, please submit your question in the Q & A, the answers will appear in the Q & A located on the HOME web starting next Friday, August 15th, 2025.

Only those questions responded to in writing can be relied on as the policy of the agency. Please do NOT contact HOME-ARP staff directly.

Please email questions to: <a href="mailto:home-arp@iowafinance.com">home-arp@iowafinance.com</a> and we will respond after the event.

Please turn off your microphone and camera during the presentation

#### Welcome

- Jason HallHOME-ARP Program Manager
  - Tangela Weiss
  - **OHOME Manager**

## 2025 HOME-ARP Application Webinar

 Initial application round for projects seeking HOME-ARP funds for the construction of rental units and the construction of rental units with supportive services.

 Nonprofit operating and nonprofit capacity building assistance is available to projects that will carry out HOME-ARP eligible activities.

## 2025 HOME-ARP Application Webinar

- The 2025 ONLINE Application will be available on August 15th, 2025, at 9:00 am.
- The Application can be accessed from IFA's website on the HOME-ARP webpage. Approved application's appendix and exhibit forms are provided and must be submitted in the application. Any other forms will not be accepted.

## **HOME-ARP Application**

- All required documents must be uploaded within the application. NO forms or information will be accepted by IFA outside of the application or after the application deadline.
- Applications are due at 12:00 PM (noon) on September 26, 2025. Do not wait until the last minute to finish your uploads and submit your application.
- ➤ If you have technical difficulties, please contact jason.hall@iowafinance.com

## Application Round Estimate Schedule

- IFA reserves the right to revise the application schedule at any time.
- ∘ 8/15/25 application will be open on IFA's HOME-ARP web page.
- ∘ 9/26/25 applications are due to IFA by 12:00 p.m. (noon).
- ∘ 10/10/25 deficiency notices sent to applicants (if necessary).
- ∘ <u>10/17/25</u> deficiency responses are due to IFA.
- 10/20/25 IFA staff review and finalize award recommendations.
- o 11/5/25 recommendations presented to IFA Board of Directors.

#### **HOME-ARP**

- Part of the American Rescue Plan Act of 2021
- Address the need for homelessness assistance and supportive services, Congress appropriated \$5 billion in ARP funds to be administered through HOME to perform activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations.

#### **Allocation Plan**

- <u>IowaAllocationPlan (hud.gov)</u>; Google: HOME-ARP Allocation Plan Iowa
- IFA conducted 16 stakeholder consultation sessions in May and June 2022 to gather input from 45 individuals across 39 agencies working to meet the needs of the QPs. IFA also developed and distributed an online stakeholder survey, which gathered 186 responses from 128 organizations.
- Performed a needs assessment and gaps analysis to evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations.
- Approved by HUD on March 16, 2023.

#### **Available Funds**

- o All funds must be expended by September 30, 2030
- ∘ \$6,750,000 Rental Unit Development
- \$860,000 Supportive Services
- \$4,500 Non-Profit Operating
- \$60,000 Non-Profit Capacity Building

## **Eligible Activities**

- Production or Preservation of Affordable Rental Housing
- Supportive Services; Only when combined with production of rental housing units
- Nonprofit Operating expenses
- Nonprofit Capacity Building expenses

## **Eligible Applicants**

> For-profit corporations or partnerships

➤ Non-profit 501(c) organizations

➤ City and Local Governments

## **HOME-ARP Qualifying Populations**

# People Experiencing Homelessness

As defined in section 103(a) of the McKinney-Vento Homeless

**Assistance Act** 

#### At-Risk of Homelessness

Extremely low-income households who do not have resources to prevent them from becoming homeless or are in unstable situations

Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking

Specific definitions for each population are referenced in the HOME-ARP Notice

#### Other Populations

Where providing supportive services or assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability

#### **Preferences**

- Are used to establish order in which applicants are admitted to HOME-ARP housing or shelter/ provided with HOME-ARP TBRA or services.
- Permit an eligible QP applicant that qualifies for preference to be selected for HOME-ARP assistance before another eligible QP applicant that does not qualify for a preference.
- Does not make anyone eligible who was not otherwise eligible for HOME-ARP assistance (i.e., a member of a QP)
- Must comply with all applicable fair housing, civil rights, and nondiscrimination requirements, (e.g., Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and Americans with Disabilities Act).
- If preferences are not adopted, QP applicants are selected from a projector activity-specific waiting list in chronological order to the extent practicable

#### **Limitations**

- Exclude certain QPs or subpopulations of QPs from eligibility for a project or activity -unlike preferences which provide priority to a QP or a subpopulation.
- Some limitations violate fair housing and civil rights laws (including protections for disabled).
- Limitations can make it difficult to meet ARP requirement that all four QPs have access to its HOME-ARP program.
- Should not impose a limitation on eligibility unless:
  - It is necessary to address a greater gap in effective housing, aid, benefit, or services in the PJ's geographic area; and project or activity cannot address the gap by a preference.

#### **Limitations Continued**

- From IFA's Allocation Plan:
- IFA may establish a limitation for two qualifying populations based on the unique housing and supportive service needs of those populations. These include:
- Individuals experiencing homelessness, as defined in 24 CFR 91.5
- Persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD

#### **Preference/Limitation HUD Guidance:**

- Before adopting a preference/limitation particularly one that relates directly or indirectly to a protected class – HUD strongly recommends conferring with the Fair Housing and Equal Opportunity (FHEO) Division.
- o If a PJ implements a limitation on a HOME-ARP project or activity, it must fund at least one other project or activity that provides access to all other QPs of subpopulations of QPs.
- olf establishing preferences or limitations, pay close attention to related allocation plan requirements.

#### **Maximum Amounts**

- The Maximum amount a HOME-ARP Applicant can request is:
- Rental Housing Development: \$5,000,000
  - IFA requires minimum 25% project funding from a source other than HOME-ARP
- Supportive Services: \$150,000 per year\*.
- Nonprofit Operating and Capacity Building: Greater of 50% general operating expenses or \$50,000, per year\*, for either one assistance. Greater of 50% general operating expenses or \$75,000, per year\*, for both assistance types.
- \*HOME-ARP funds are available 2024-2029

#### **Rent Restrictions**

- Minimum 70% of HOME-ARP units will be for qualifying populations. IFA may allow up to 30% of it's HOME-ARP units for individuals or households earning up to 80% of the Area Median Income (AMI).
- Rent Limitations apply. See application for more details.

## **Application Threshold**

 There is a Threshold list in the Application Manual. If a project application does not meet requirements of the threshold items, the application will not be reviewed any further by IFA.

#### **Section 3**

- Section 3 is a provision of the Housing & Urban Development Act of 1968 that is applicable to CDBG-funded projects.
- Applicable when construction activities exceed \$200,000 in HUD funding.
- o 24 CFR Part 75
- Section 3 requires the employment of low-income persons, preferably low-income persons residing in the local area, in HUD-funded projects. This is intended so that:
- Low-income persons may gain professional skills that lead to longterm employment;
- Extend employment opportunities to nearby low-income residents;
- Maximize the benefits of the federal investment to the community

## **Section 3 Reporting Benchmarks**

- >Section 3 tracks labor hours
- ➤At least 25% of total project hours should be worked by Section 3 Workers.
- ➤At least 5% of total project hours should be worked by Targeted Section 3 Workers.
- ➤If these 25% and 5% safe harbor benchmarks are met, then the project has complied with Section 3. If not, qualitative efforts can ensure compliance.

## **Section 3 Reporting Benchmarks**

- The tracking of labor hours applies even if the project does not have to comply with Davis Bacon labor standards.
- ➤ All hours on the project should be tracked, not just Section 3 workers
- ➤ Hours should be tracked by the contractors and grant administrator as the project is underway and reported to IEDA at the conclusion of the project. Hours must be tracked even if failing to meet the safe harbor benchmarks.
- ➤IEDA has provided templates in Appendix 8 of the CDBG Management Guide website to guide compliance with Section 3.

#### **Section 3 Worker Defined**

- ➤ 25% of project hours should be completed by Section 3 workers. These individuals must meet **1 or more** of the following within the past 5 years:
- >Low income for the prior annualized calendar year
- >At or below 80% individual Area Median Income (AMI) to be considered Low Income
- >Employed by a Section 3 Business
- Current Youth Build participant

1-Person income. Does not consider spouse or other household.

## **Section 3 Reporting Qualitative Effort**

- Qualitative efforts should be done from the beginning, just in case labor hour benchmarks aren't met.
- If using qualitative efforts to demonstrate compliance, it is essential to maintain documentation of these efforts. This includes:
  - Copies of direct mail solicitations
  - Email and Internet outreach efforts
  - Formal job advertisements
  - Flyers or online ads about meetings, job training programs, etc.
  - Sign-in lists from job fairs
  - Agendas and/or meeting notes from meetings with contractors
- At least 1 qualitative effort must be done to comply. Speak with IFA staff about the effort before closeout to ensure compliance.

#### **Section 3**

- More information on section 3 will be provided at the award workshop. Including information on the forms the come with section 3 and how to report hours to IFA.
- IF you have any questions on section 3 or need any further assistance regarding the rule please reach out to

Jacob.Levang@lowaeda.com

#### **David-Bacon Act**

- Enacted in 1931, amended in 1935 & 1964
- Davis-Bacon requirements are applicable to contracts for construction covering 12 or more HOME-assisted units
- Applies to construction, alteration and/or repair including painting & decorating of public buildings or public works contracts
- Requires pay of prevailing wages to all laborers and mechanics employed on site – regardless of any alleged contractual relationship

#### **Davis Bacon Act**

- Requires weekly pay to mechanic and laborers
- Requires posting of applicable wage decision
- Defines prevailing wage to include fringe benefits
- o Permits withholdings from contractors' payments for wages due

## **Making Davis Bacon Work**

- Job Sites Safety, Required Postings
- Interviews (on-site workers)
- Review of Certified Payrolls Receive weekly
- Statement of Compliance all blocks must be completed

## **Recipient Responsibilities**

- Ensure bid documents, contracts and subcontracts contain Federal Labor Standards Provisions (HUD-4010)
- Ensure bid documents, contracts and subcontracts contain applicable wage determination
- Review certified payroll reports (CPR's) and verify discrepancies through employee field interviews

### **QUESTIONS**

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#### **THANK YOU**

Name | Title lowa Finance Authority