



HOME – American Rescue Program (HOME-ARP) Allocation Plan

For Submission to the U.S. Department of Housing and Urban Development as Substantial Plan Amendment to the 2021 Annual Action Plan for the City of Eau Claire HOME Investment Partnership Program.

Introduction

OVERVIEW

The American Rescue Plan (ARP) 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).

ELIGIBLE GRANTEES

State and local participating jurisdictions that qualified for an annual HOME Program allocation for FY 2021 are eligible to receive HOME-ARP grants. HOME-ARP funds will be allocated using the HOME Program formula. The HOME-ARP allocations were announced on [April 8, 2021](#). The City of Eau Claire was allocated [\\$1,140,076](#) in FY2021 HOME ARP funding.

Describe the consultation process including methods used and dates of consultation:

Consultation with service providers has been an ongoing process. The City of Eau Claire Housing Division takes pride in meaningful connections they have with partners within the community in order to make a larger impact. Consultations have taken place through in person meetings, virtual meetings, phone calls and emails with City staff. These consultations focused on seeing information regarding the programs going on currently within these agencies, their upcoming plans, goals and what gaps they see in trying to make these goals a reality. The table below outlines the consultations.

Table I: List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback	Community Stakeholder
ADRC	Aging and Disabilities Resource Center	Virtual	Discussed the agency the HOME-ARP funding background, eligible activities, and the target populations. Particularly with an emphasis on the veteran population. Feedback from this group as well as follow-up discussions with individual organizations informed the build of the allocation plan narrative.	Public agencies that address the needs of the qualifying populations.
Bolton Refuge House	Domestic violence service provider	Virtual	Discussed current issues that the homeless provider is seeing with getting individuals into housing. Included difficulties based on lack of affordable housing, high rents, supportive needs and difficulty with tenant selection/application processes.	Victim Services Providers
Continuum of Care Meeting	CoC Provider	Virtual	Discussed HOME-ARP funding background, eligible activities, and the target populations. Particularly with an emphasis on the veteran population. Feedback from this group as well as follow-up discussions with individual organizations informed the build of the allocation plan narrative.	Continuum of Care

CVI (Center for Veterans Issues)	Veterans Service Provider	Virtual	Discussed services provided by the veteran’s services agency. Identified unmet housing services included an emphasis on affordable housing for veterans.	Veterans’ Groups
Family Promise of the Chippewa Valley	Homeless Service Provider	Virtual	Discussed current issues that the homeless shelter provider is seeing. Once again difficulties in placing families in permanent housing was due to lack of affordable housing, high rent and difficulty qualifying tenants.	Homeless Service Provider
Habitat for Humanity	Non-Profit Service Provider	Phone Conversation	Discussed the HOME-ARP background and eligible activities. Discussed the homeless or at risk of becoming homeless veterans within the city.	
Housing Authority of the City of Eau Claire	Fair Housing/Civil Rights Contact	In-Person Meeting	The Housing Authority is the contact for any fair housing issues. The HOME-ARP funding was discussed and the potential use of the funds.	Public Housing Agencies
Eau Claire City/County Health Department	Health Services	In-Person Meeting	Discussed the HOME-ARP background and eligible activities. Discussed the homeless or at risk of becoming homeless veterans within the city. The director stated they were in full support of the intended use of HOME-APR funds. They felt it would be a benefit to the veterans that would provide housing and address mental health issues as well.	Public agencies that address the needs of the qualifying populations.
Eau Claire Housing Authority	Public Housing Authority (PHA)	In-Person Meeting	Spoke with a representative of the Housing Authority. Discussed the grant, as well as the goals and requirements of potential programs. Also discussed the importance	Public Housing Agencies

			services that must be provided to those in the unhoused population, because without them they will never successful in any home they get. We also discussed the use of the funds for development of apartments for the unhoused and potentially unhoused veteran population.	
Eau Claire County Department of Human Services	Human Services	Virtual	Spoke with the Director and Deputy Director of the Department of Human Services and discussed the need for Veteran services within the City of EC. They were in full support of using HOME-ARP funding to develop housing to provide shelter for at risk Veterans.	Public agencies that address the needs of the qualifying populations.
VA Health Care	Veterans Service Provider	Virtual	Discussed the services provided by the VA. Identified unmet housing services which included an emphasis on affordable housing. The agency reported that there is a need for affordable housing for single male veterans.	Veterans' Groups
WI Balance of State	CoC Provider	Virtual	Discussed the HOME-ARP background and eligible activities. Identified the need for more affordable housing and the need for case management.	Continuum of Care

Summarize feedback received and results of upfront consultation with these entities:

The feedback overwhelmingly points to the need for more permanent and affordable housing for individuals with lower incomes. The current shortage in Eau Claire and across the region of housing solutions that are affordable to low-income individuals has created a significant need for additional housing units that can fulfill this need. Eau Claire’s homeless population and populations at risk of becoming homeless continues to increase due to the lack of low-income housing availability. An increase in available low-income housing stock will help fill the gap created by low inventories of low- income housing options. Additionally, many of our people

experiencing homelessness will need supportive services with their housing. Permanent Supportive Housing is a needed housing solution.

Public Participation

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

- *Date(s) of public notice: 4/22/2024*
- *Public comment period: start date – 4/22/2024 end date – 5/7/2024*
- *Date(s) of public hearing: 5/2/2024*

Describe the public participation process:

A Draft HOME-ARP Allocation Plan was made available for public comment beginning April 22, 2024 and ending May 7, 2024. The plan was available on the City of Eau Claire’s website and in the City of Eau Claire Housing Division’s office at 203 S Farwell St, Eau Claire, WI. Notice of the comment period and public hearing was made available via public notice in the *Leader Telegram*. The City of Eau Claire’s Housing Division held a public hearing on the HOME-ARP Allocation Plan on May 2, 2024 at 11:00 a.m. in the City Council Chamber of City Hall. Written comments were accepted throughout the review period and oral comments were accepted during the public hearing.

Describe efforts to broaden public participation:

The City of Eau Claire Housing Division tried to broaden public input and participation by including notice of the plan by sharing it with members of the CoC and others who participated in the consultation process.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

No comments were received during the public participation

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

N/A

Needs Assessment and Gaps Analysis

Table II: Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	108	41	90	41	0								
Transitional Housing	54	20	35	35	0								
Permanent Supportive Housing	13	4	22	22	1								
Other Permanent Housing	0	0	0	0	0								
Sheltered Homeless						8	45	0	0				
Unsheltered Homeless						0	30	3	0				
Current Gap										165	57	72	23

Information provided by the Continuum of Care 2022 Point-in-time Results.

Table III: Housing Needs Inventory and Gap Analysis Table – City of Eau Claire

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	12,160		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	3,155		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,780		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (at-risk of homelessness)		2,635	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (other populations)		1,380	
Current Gaps			920

Comprehensive Housing Affordability Strategy (CHAS) based on 2016-2020 ACS 5-year estimates.

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

Homeless as defined in 24 CFR 91.5

According to the Point in Time (PIT) count conducted during a 24-hour time period on January 22 and 23rd 2022, there are approximately 89 individuals experiencing homelessness in Eau Claire. Of these individuals, 27 identify as female and 62 identify as males. These individuals largely represent the 19 to 65-age range and identify as male. Ten of these individuals are considered chronically homeless and nine (9) are unsheltered individuals. Of these individuals, approximately 83% identify as White, 7 % Black or African American, 2% Asian, 2% American Indian, First Nations or Alaska Native, and 6% prefer not to say. Of these, 8% were Hispanic/Latino. These individuals largely represent the 18 to 60-age range with 65% identify as male.

During the PIT count, there were a total of 89 people experiencing sheltered homelessness between Sojourner, Family Promise and Western Dairyland shelters. 11% identify as male, 38% identify as female and 1% were transgender. 75% were adults over the age of 18, and 25% were Children. 76% were White, 10% Black or African American, 2% Asian, 2% American Indian, and 10% Multiple races, 15% were Hispanic/Latino. 24% of those in shelter reported previous history with domestic violence.

At Risk of Homelessness as defined in 24 CFR 91.5

According to the Point in Time (PIT) count, there were four single adult male veterans that were at risk of homelessness. There were nine (9) people were at-risk of homelessness. 22% were adults and 28% were children. 56% identify as male and 44% identify as female. 12% were White, 44% were Black or African American, and 44% were of Multiple Races and none were Hispanic/Latino. 22% reported a history of domestic violence.

Data from the Comprehensive Housing Affordability Strategy (CHAS) data based on 2016-2020 ACS 5- year estimate for the City of Eau Claire shows a total of 12,160 rental units available in Eau Claire. Of those units, 25.9% are affordable to households at-risk of homelessness (at or below 30% area median income (AMI)) and 40.6% are affordable to households at or below 50% AMI. Within the 30% AMI, 83.5% are households with 1 or more severe housing problems.

CHAS data does not tell an accurate story based on current housing needs. 2016-2020 ACS 5-year estimates show a 5.63% vacancy rate for the City of Eau Claire. 2018-2022 ACS 5-year estimates show a 1.98% vacancy rate for the City of Eau Claire. 2018-2022 ACS 5-year estimates have an increase of rental units to a total of 12,772 (+612). With that increase, availability of housing has significantly decreased leading to increased demand and higher prices on all units. This has drastically decreased units available to individuals making less than 50% of CMI.

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

In our community, our agencies assist approximately 10-13 people per quarter that are in this qualifying population. 85% were Adults, 15% Children, 76% identify as female, 16% identify as male and 8% Other. Of these individuals, approximately 77% identify as White, 5% Black or African American, 3% Asian, 6% Multiple Races, 4% Hispanic and 5% Other. 82% sought shelter for Domestic Violence, 35% Sexual Assault, 4% Human Trafficking and 5% Elder Abuse. Services include but are not limited to: emergency shelter, counseling and advocacy and assistance with orders of protection. Data was not available on overlap in populations.

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

There were 35 individuals enrolled in rapid re-housing through either Family Promise or Western Dairyland. 49% were Adults and 51% were Children. 26% identify as male and 74% identify as female. 74% were White, 6% Black or African American, 20% were of Multiple Races, and 1% were Hispanic/Latino. 23% reported a history of Domestic Violence.

There were 33 individuals enrolled in Permanent Supportive Housing through Western Dairyland. 79% were adults, 21% children. 73% identify as male and 27% identify as female. 88% were White, 6% Black or African American, 3% were Asian, and 3% were of Multiple Races and 6% were Hispanic/Latino. 15% reported they had a history of Domestic Violence.

According to 2020 5-year American Community Survey data, Eau Claire's median household income was \$59,705 with 30% MHI at \$17,912. Due to Census income breaks, at-risk of being homeless is being calculated at \$24,999 MHI and 19% (5,328 households) of the City of Eau Claire's households are at risk of being homeless. The 2021 Asset Limited Income Constrained Employed (ALICE) report for Eau Claire County shows 24% of households are considered ALICE households, households earning just above the Federal Poverty Level but less than what it costs to make ends meet. ALICE workers often struggle to keep their own households from financial ruin while keeping our communities running. The same report found 12% of households in Eau Claire County are households in poverty. Data for cities in Eau Claire County shows 39% of households in the City of Eau Claire are ALICE households.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

The homeless in the community need more options for permanent affordable housing. Currently, there are not enough low-income dwellings to accommodate individuals who are unsheltered and seeking housing. Additionally, as the homeless population continues to increase, providing access to more permanent, affordable housing opportunities will help ensure that low-income people experiencing homelessness will have access to housing options that will be sustainable on a limited income.

At Risk of Homelessness as defined in 24 CFR 91.5

Due to the shortage of affordable housing options, many individuals and families in our community are at risk of experiencing homelessness because they are unable to afford the rising cost of housing in our area.

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

As with other qualifying populations, those fleeing interpersonal violence need access to permanent housing that is affordable.

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

There is a need for supportive services, on-going case management and housing with the homeless or at risk of becoming homeless veterans in the City of Eau Claire. There is a need for increased outreach efforts to help inform people at-risk of programs available to attempt to prevent someone from becoming homeless.

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

There is a strong need for permanent housing especially for single male adults and family units. Shelters within the city are typically full. The emergency shelter is often near capacity and goes into overflow during extreme weather situations. Low-income housing solutions are needed to help house people experiencing homelessness and reduce capacity concerns at the emergency shelter. Development of affordable housing will enable people experiencing homelessness to have housing options that will be sustainable with low income.

Table III: Race and Ethnicity of Homeless

All Family Households

Race (Adults and Children)	ES	TH	US	Total
White	7	11	0	18
Black, African American or African	0	0	0	0
Asian or Asian American	0	0	0	0
American Indian, Alaskan Native, or Indigenous	0	4	0	4
Native Hawaiian or Pacific Islander	0	0	0	0
Multiple Races	0	2	0	2

Ethnicity (adults and Children)	ES	TH	US	Total
Non-Hispanic/Non-Latin	7	15	0	22
Hispanic/Latin	0	2	0	2

All Households without Children

Race (Adults and Children)	ES	TH	US	Total
White	7	31	23	61
Black, African American or African	1	1	4	6
Asian or Asian American	0	1	0	1
American Indian, Alaskan Native, or Indigenous	0	0	2	2
Native Hawaiian or Pacific Islander	0	0	0	0
Multiple Races	0	4	1	5

Ethnicity (adults and Children)	ES	TH	US	Total
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Non-Hispanic/Non-Latin	8	34	30	72
Hispanic/Latin	0	3	0	3

Table IV: Persons and Households Experiencing Homelessness

Overall Persons	Sheltered Persons	Unsheltered Persons	Total
Individuals	45	30	75
Families	8	0	8
Total	53	30	83
Overall Households	Sheltered Households	Unsheltered Persons	Total
Individuals	45	30	75
Families	24	0	24
Total	69	30	99

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Not applicable.

Identify priority needs for qualifying populations:

As stated throughout the allocation plan, priority needs for our community for qualifying populations is the need for low-income housing units.

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

The City of Eau Claire was able to secure information from the agencies through consultations, but also leveraged information from the Point in Time (PIT) count, along with various agencies yearly summaries of the demographics helped.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

Our goal is to solicit proposals that would increase available housing options for individuals in all four qualifying populations. We spoke to the local service agencies about this goal which was met with overall acceptance.

Programming will be open to all members of the four qualifying populations. Our justification is that we want to do a “bricks and mortar” type project for those in the qualifying populations to expand affordable housing in our jurisdiction.

Describe whether the PJ will administer eligible activities directly:

The City will prepare a Request for Proposals and accept applications from organizations who are proposing to develop housing units for the qualifying population.

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

The funding will NOT be provided 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
Supportive Services	\$ 0		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 969,065.00		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 171,011.00	15 %	15%
Total HOME ARP Allocation	\$ 1,140,076.00		

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

The City of Eau Claire intends to use the HOME-ARP money to assist with the acquisition and rehabilitation or new construction in the area to develop low-income housing. The housing will be available to individuals in the four qualifying categories. The awarded organization should work with partners to identify referral methods.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The City of Eau Claire worked diligently to gather data from as many agencies as possible. The City then analyzed the data to assess where the largest gap was, and then, what the biggest need would be to fulfill the gap. They also assessed what cause and effect would come of the different scenarios, and which scenario could help the most people. The consistent feedback that the City received was the need for more affordable housing units.

HOME-ARP Production Housing Goals

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

The City of Eau Claire estimates that over a 3-year period a total of 16 units for qualifying individuals/families will be produced with the HOME-ARP allocation and they will remain available for a minimum of 15 years. The addition of these units will result in individuals and families maintaining and/or improving their housing stability and self-sufficiency.

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

The City of Eau Claire hopes to see multiple units created for low-income individuals with the HOME-ARP funding. The housing units created will help house individuals who are in one of the four qualifying groups.

Preferences

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

The City of Eau Claire intends to allow sub recipients to provide a preference for veterans who fall within any of the qualifying populations.

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

In consultation with community agencies, the need for affordable housing for veterans was identified by numerous agencies. The City of Eau Claire will not provide a preference for any of the four qualifying populations, but will allow sub recipients to provide a selection preference for veterans who meet the criteria of one of the four qualifying populations. This preference is consistent with the City of Eau Claire's needs assessment as described in this plan.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with [24 CFR 92.206\(b\)](#). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***
 Not Applicable. The City of Eau Claire does not plan to use HOME-ARP to refinance existing debt secured by multi-family housing.
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***
 Not Applicable. The City of Eau Claire does not plan to use HOME-ARP to refinance existing debt secured by multi-family housing.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
 Not Applicable. The City of Eau Claire does not plan to use HOME-ARP to refinance existing debt secured by multi-family housing.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
 Not Applicable. The City of Eau Claire does not plan to use HOME-ARP to refinance existing debt secured by multi-family housing.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
 Not Applicable. The City of Eau Claire does not plan to use HOME-ARP to refinance existing debt secured by multi-family housing.
- ***Other requirements in the PJ's guidelines, if applicable:***
 Not Applicable.