HOME Investment Partnerships (HOME)

American Rescue Plan (ARP)

Allocation Plan

August 2026

ARLINGTON
VIRGINIA

DEPARTMENT OF COMMUNITY PLANNING, HOUSING & DEVELOPMENT

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HUD Guidance

- To receive its HOME-ARP allocation, a PJ must:
    - Engage in consultation with at least the required organizations;
    - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
    - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: A PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the "HOME-ARP allocation plan" option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF 424B, and SF 424-D, and the following certifications as an attachment on either the Ad-26 or AD-25 screen, as applicable:
    - Affirmatively Furthering Fair Housing;
    - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
    - Anti-Lobbying;
    - Authority of Jurisdiction;
    - Section 3; and,
    - HOME-ARP specific certification.

Participating Jurisdiction: Arlington County, VA **Date:** September 1, 2026

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction's geographic area, homeless and domestic violence service providers, veteran's groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state's boundaries, however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

In 2022, Arlington County submitted and was approved for its HOME-ARP allocation plan, which identified two primary goals: additional rental units with deep affordability and short-term supportive services for renters in these units. While these continue to be significant needs, using the HOME-ARP funds for this purpose proved to be infeasible because of the high cost of housing and the inability to layer HOME-ARP with other federal funding sources. Therefore, Arlington conducted additional consultation and outreach to restructure the goals of the HOME-ARP funding, resulting in a community consensus that non-congregate shelter is an unmet need for the qualifying populations.

In developing the original allocation plan in 2022, County staff conducted extensive outreach and consultation:

- A listening session on December 9, 2021, with more than 40 participants from a wide range of community nonprofits. Direct outreach to the Department of Human Services Housing Assistance Bureau staff, organizations that participate in the County's Continuum of Care, and other safety net nonprofits in the community.
- A feedback session on May 12, 2022, in which the same organizations that participated in the listening session were invited to provide feedback on the draft plan.
- A public hearing hosted by the Community Development Citizens Advisory Committee (CDCAC) on June 1, 2022.
- An online feedback tool to capture written feedback from members of the community.

The following organizations and community members participated in the initial feedback sessions:

- AHC, Inc.
- Alliance for Housing Solutions
- Arlington Community Foundation
- Arlington County Continuum of Care
- Arlington Commission on Aging
- Arlington Neighborhood Village
- Arlington Partnership for Affordable Housing
- Arlington Thrive
- Capital Youth Employment Program
- Doorways for Women and Families
- Edu-Futuro
- Ethiopian Community Development Corporation

- Friends of Guesthouse
- Gilbane, Inc.
- Just Neighbors
- La Cocina VA
- Latino Economic Development Center
- Legal Aid Justice Center
- NAACP Arlington
- National Capital Treatment and Recovery
- National Housing Trust
- New Hope Housing
- Path Forward
- Project Peace
- Rebuilding Together
- Service Source
- Shooshan Companies
- Stratford Capital Group Development
- Wesley Housing Development Corporation

More detailed information on organizations consulted and feedback received can be found in the original allocation plan, and in the appendix to this document.

In 2026, Arlington conducted additional consultation and outreach to revise the allocation plan. Based on market conditions and program requirements, it proved to be difficult to use the funds for their original planned purpose. In addition, the need for noncongregate shelter for qualifying populations has become increasingly urgent. Consultation for the updated plan occurred with the Continuum of Care and the Community Development Citizens Advisory Committee, including multiple opportunities for public comment.

Public Participation

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

For the purpose of HOME-ARP, PJs are required to make the following information available to the public.

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

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

For the development of the original plan in 2022, the following public participation process was followed:

- ***Public comment period****:* May 11, 2022 – June 10, 2022
- ***Public hearing dates:*** December 9, 2021, and May 12, 2022
- ***Other public meeting dates:*** June 1, 2022 and June 6, 2022

For the development of the updated plan in 2026, the following public participation process was followed:

- ***Public comment period****: August 26, 2026 – September 26, 2026*
- ***Public hearing date:*** *September 2, 2026*
- ***Other public meeting dates:*** August 10, 2026 and September 14, 2026

Narrative response:

The format for both the public hearings and other public meetings are described below.

December 9, 2021, HOME-ARP Listening Session (Public Hearing):
County staff held a listening session on December 9 with more than 40 community nonprofits and stakeholders to gather feedback on community needs for the qualifying populations. The session began with a presentation of Continuum of Care (CoC) accomplishments over the last fiscal year, an overview of HOME-ARP fund eligible activities and qualifying populations. The session then concluded with splitting out intobreakout groups to ask participants a series of questions related to the needs of qualifying populations related to the various eligible activities. The questions asked of each group were as follows:

May 12, 2022, HOME-ARP Allocation Plan Feedback Session (Public Hearing): County staff held a session to gather feedback of the draft HOME-ARP Allocation Plan on May 12, 2022. The session involved an overview of the HOME-ARP program and funding guidelines, a review of the draft HOME-ARP Allocation Plan, and feedback on how the County should go about implementing the HOME-ARP program.

June 1, 2022, CDCAC Meeting (County Commission Meeting Open to the Public): The Community Development Citizen Advisory Committee (CDCAC) is the County's advisory board that provides input and direction to the County Board on the distribution of HUD funding. CDCAC reviewed the HOME-ARP Allocation Plan and members of the public and interested stakeholders were invited to attend to provide input on the plan at this meeting.

June 6, 2022, Continuum of Care Housing Subcommittee Meeting: The Continuum of Care Housing Subcommittee reviewed the HOME-ARP Allocation Plan at its June meeting. Participants in this meeting included representatives from organizations that are active in the County's Continuum of Care. The Housing Subcommittee is responsible for facilitating access to affordable housing for homeless individuals and families, increasing the supply of rental assistance provided to homeless individuals and families; and increasing the supply of housing affordable to homeless individuals and families.

Online Written Feedback: County staff developed a online feedback form for members of the public to weigh in on the HOME-ARP Allocation Plan. The questions asked in this feedback form were also asked as polling questions during the May 12 Feedback Session and the June 1 CDCAC meeting.

August 10 and September 14, 2026 Continuum of Care Executive Committee Meetings: The Continuum of Care Executive Committee reviewed the HOME-ARP Amended Allocation Plan at its August meeting and will provide feedback at its September meeting. This committee serves as the principal body to lead, govern, and implement all tasks of the CoC that prevent and ends homelessness. It is a partnership of community leaders from private and public agencies, faith community, and others committed to ending homelessness, as well as past and/or present consumers of homeless services.

September 2, 2026, CDCAC Meeting (County Commission Meeting Open to the Public):

Describe any efforts to broaden public participation:

As required by the County's Citizen Participation Plan, the County held two public hearings and issued a 30-day public comment period to gather feedback in the development and review of the HOME-ARP Allocation Plan. These steps were followed both in 2022 and 2026. In addition, the County took considerable steps to broaden public participation, including the following:

- Significant interdepartmental collaboration and planning with County staff to ensure that all aspects of affordable housing were incorporated, including the Department of Human Services and Department of Community Planning, Housing and Development.
- Direct consultation with Arlington County's Continuum of Care partners, including participation in public hearings and at regularly scheduled Housing sub-committee meetings.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

December 9, 2021, HOME-ARP Listening Session (Public Hearing): The feedback indicated that the following areas are the highest priority for the target populations under this scope:

- Affordable Housing:
    - Rental units with deeper affordability (50% AMI and below)
    - Larger, family-sized units
    - Retrofits for homes of older populations
- Supportive Services:
    - Case management support for individuals who might not have it elsewhere, specifically for older adults and persons returning from incarceration or psychiatric facilities
    - Marketing and outreach to ensure hard-to-reach populations know of available County resources
    - Employment training and opportunities and soft skills training
    - Services or supports for aging individuals who don't qualify for County assistance.

May 12, 2022, HOME-ARP Allocation Plan Feedback Session (Public Hearing): The feedback from this session indicated that the priority needs for qualifying populations were largely captured appropriately and that stakeholders agreed with the approach for planned activities. County staff asked for feedback about types of supportive services that might be needed to support qualifying populations to occupy the HOME-ARP CAF units, and the most common services mentioned were as follows:

- Resource navigation services
- Case management services
- Financial counseling
- Job skills and search assistance
- Eviction prevention services and emergency assistance
- Mental health services

June 1, 2022, CDCAC Meeting (County Commission Meeting Open to the Public): The Community Development Citizen Advisory Committee (CDCAC) reviewed the HOME-ARP Allocation Plan and was supportive of the recommendations. Summary of feedback received on the Plan included:

- One member of the public recommended clarifying whether the CAF units would be set aside specifically for domestic violence survivors at imminent risk or more broadly victims of domestic violence. "Imminent risk" implies a certain level of emergency service needed, whereby the qualifying population definition seems to be broader.
- One CDCAC member recommended that the County should consider incorporating the HOME-ARP CAF units with American Legion building, which is a affordable housing development currently under construction where 50% of the units will be set aside for veterans.
- Meeting participants provided feedback on types of supportive services that might be needed, including:
    - Mental health services
    - Resource navigation services

June 6, 2022, Continuum of Care Housing Subcommittee Meeting: The feedback received during the CoC Subcommittee meeting included:

- Homeless populations are in need of life skills especially confidence and understanding how to advocate for themselves. Other life skills such as financial management and budgeting (i.e. what are the necessities and financial priorities) is very in demand.
- All of the recommended supportive services are needed. Service navigation is especially needed. Case management is needed to assess and help residents identify what is needed to stabilize their housing.
- Case management is also important, especially because there is a strong need to assess the needs of each tenant since they will all be different. A priority for these supportive services should be to tailor services to individuals needs of residents.
- Employment navigation is also much needed, especially assisting residents in getting a better job or increasing their work skills. Finding jobs that are suitable to what residents are able to do and helping them fill out applications for whatever they may need.
- There was a general concern about those who don't want to go through the County Centralized Access System, especially those who really meet these needs with regards to disability.

September 2, 2026, CDCAC Meeting (County Commission Meeting Open to the Public):

August and September Continuum of Care meetings

Summarize any comments or recommendations not accepted and state the reasons why:
There were no comments or recommendations that were not accepted in the draft HOME-ARP Allocation Plan.

Needs and Gap Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

Describe the size of demographic composition of qualifying populations within the PJs boundaries:

Individuals and Families At-Risk of Homelessness: Due to the COVID-19 pandemic beginning in spring 2020, the County has experienced a substantial growth of households and individuals at risk of homelessness. Approximately 1,550 households were assisted in County FY 2020 (federal FY 2019) and 1,586 were assisted in County FY 2021 (federal FY 2020) to avoid eviction or receive emergency rental assistance funding. This previous year's increase is largely due to the COVID-19 pandemic and impacts on working families with children due to closed schools and childcare, underemployment and unemployment. This level of need was sustained through FY 2023 when 1,898 households were served. Once the state of emergency ended and COVID-19 response funds ended, Arlington County also instituted a financial cap of $3,000 per household per year. In FY 2024 1,379 households and in FY 2025, 1,611 households received assistance.

The community's increased emphasis on efforts to prevent homelessness and support families at-risk of homelessness, coupled with significant new and added resources to our efforts, was extensive and garnered many successes. However, once pandemic resources and emergency policies ended, the County experienced a return to pre-pandemic levels of need and services. This is evidenced by both Point-in-Time (PIT) Count and overall Continuum of Care (CoC) trends:

- Starting in 2022, overall PIT Count totals increased from a 2021 low of 171 people to a high of 271 people in 2025. This is an increase of 100 people or an increase of 58%.
- Unsheltered homelessness increased from 20 people counted in the 2022 PIT Count to a high of 42 people in 2023. In 2025's PIT Count, there were 37 people experiencing unsheltered homelessness. Between 2022 and 2025, this represents an increase of 85%.
- Sheltered homelessness increased from a low of 144 people in 2021's PIT Count to a high of 234 people in 2025's PIT Count. This represents an increase of 63%.
- Across the entire CoC (including emergency shelter and housing programs), 1,070 people were served in FY 2022. In FY 2025, this number increased to 1,328, representing an increase of 24%.

- **Individuals or Families Experiencing Homelessness**: While Point-in-Time Counts decreased year to year through the height of the pandemic, these trends reversed for both individuals and families experiencing in 2022.
    - During the 2021 PIT Count, 127 single adults and 44 people in 14 family households were experiencing homelessness. In 2022, 132 single adults and 19 people in 50 family

households were counted. In 2025, these numbers increased to 183 single adults and 88 people in 33 family households. This represents an increase of 44% for single adults and 100% for people in families between 2021 and 2025.
    - While there has been some variation between year-to-year changes for Veterans experiencing homelessness, due to sustained efforts to maintain a functional end to Veteran homelessness and supporting policies and practices towards those efforts, between 2022 and 2025, there has been no substantial change in the number of Veterans counted on the nights of the PIT Count.
    - The majority of people experiencing homelessness on the night of the 2025 PIT Count were aged 35-44 years. Thirty-two percent (32%) of people were over the age of 55, and 72 people were over the age of 65, reflecting the aging population of those experiencing homelessness.
    - People identifying as Black/African American and Hispanic/Latin-X were over-represented among people who were surveyed on the night of the count. While representing 10% of the Arlington County overall population, 53% of respondents of the 2025 PIT Count survey were Black/African American. While representing 16% of the Arlington County overall population, 23% of respondents of the 2025 PIT Count survey identified as Hispanic/Latin-X.
- **Individuals fleeing or attempting to flee domestic violence**: The number of survivors of domestic violence increased in the 2025 PIT (by 6% or 1 person).

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

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

Individuals or Families Experiencing Homelessness: Utilizing analysis of Arlington County's 2026 Point-in-Time Count, Arlington experienced the first, albeit minor, reduction in homelessness. In 2026, 268 people were experiencing homelessness on the night of the PIT Count. This reflects a 1% decrease or a reduction of 3 people compared to the 2025 PIT Count. Of the 268 people, 25 people were unsheltered. This was a reduction of 12 people as compared to the 2025 PIT Count, but was largely driven by regional weather events and local efforts to assist people in accessing shelter options to avoid severe cold and winter conditions. Subsequently, Arlington County experienced a 4% increase in those residing in emergency shelter and transitional housing as a result of an increase of single adults accessing shelter during the PIT Count. Other notable factors in this analysis includes the following points:

- Despite efforts to encourage shelter access on the night of the PIT Count, 25 people chose to remain outside.
- While emergency shelter for single adults was utilized at higher rates than in 2025, the overall increase of the shelter count was tempered by reductions in family homelessness. Family homelessness decreased by 26%. This reduction was attributed to a shift from hotel/motel services provided in 2025 to families when family shelter capacity had been reached to a model of non-congregate overflow shelter coupled with services that deploy housing-focused case management and rapid resolution/diversion services.

While FY 2026 data is not available at this time, Arlington County's CoC has experienced annual increases of persons served for the past four years as measured by an unduplicated count of people served across all CoC programs (outreach, shelter, rapid rehousing, and PSH). In FY 2022, 1,070 people were served as compared to 1,328 people served in FY 2025. This increase reflects the growing need of people experiencing homelessness since the COVID-19 pandemic and related resources ended.

Individuals or Families at-risk of Homelessness: Rental housing for very low-income (<60% AMI) and extremely low income (<30% AMI) households is needed to close the current housing gap and meet future needs. This group of individuals and families includes many workers who serve the Arlington community and economy, and the lower-wage jobs they work in will comprise a larger share of the region's overall employment in the years to come. This group of households faces the most stress associated with rent increases, and the supply of housing that is affordable to this group has declined sharply over the past decade.

Emergency shelter access remains an option of last resort for people as the CoC prioritizes shelter placement to those who no longer have any alternative housing or sheltering options. That said, with increases in evictions, rising rental costs, strained public safety net resources, long-term housing stability in a high cost community, many households may be on the cusp of experiencing homelessness. Additional sheltering options provides a broader safety net for those who can no longer maintain their housing and who do not have safe, alternatives.

Victims of Domestic Violence: In FY 2024, Doorways, the sole domestic violence shelter operator in Arlington, expanded shelter capacity for survivors of domestic violence. This change was a result from measurable increases in both shelter need and severity of risks/lethality in hotline calls. These increased needs were already observed beginning FY 2021 when 80 people in 44 households were served. By FY 2025, 150 people in 79 households were served in their DV shelter.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

Congregate and Non-Congregate Shelter: Arlington County's CoC is committed to providing low-barrier, housing-focused emergency shelter for people and families when they cannot find alternative housing options. Arlington largely relies on congregate shelter for individuals and families. Three of the four emergency shelters are owned by the County, and two of the four are congregate settings by design.

In 2023, the CoC was awarded a Joint Transitional Housing-Rapid Rehousing project funded by the Department of Housing and Urban Development (HUD) through its Supplemental Notice of Funding Opportunity (SNOFO) for people experiencing unsheltered homelessness. It was through the feedback of people with lived experience and community members, that this project type was selected. Additionally, the transitional housing component, meant to function like emergency shelter, was intentionally designed to be provided in non-congregate, master-leased apartments in the community to expand shelter access to those who may not feel comfortable residing in a congregate shelter.

In FY 2025, Arlington County's CoC included four emergency shelters. (One of originally five shelters was taken offline in FY2024. The building was owned by an area nonprofit and was no longer effectively meeting the needs of their program participants (survivors of DV). The organization pivoted the use of another site they owned and that had previously operated as emergency shelter for families to expand capacity to serve more survivors of domestic violence at that site.) To meet the needs of families experiencing shelter with the change in shelter capacity noted above, the Department of Human Services made hotel/motel resources available for the majority of FY 2024 and part of FY 2025. During this time, Arlington County also included expanded overflow shelter resources in its competitive Homeless Services Request for Proposal (RFP) which introduced additional non-congregate shelter resources for people experiencing homelessness. This created an additional 35 family shelter overflow beds that are operated out of master-leased apartments in the community.

Shelter bed availability is largely dependent upon how quickly and how often people exit from shelter, ideally to permanent housing. While shelter resources are a critical part of the CoC's response to homelessness, it is a costly resource and cannot easily change as needs in the community change (such as when there is increased/decreased demand). However, non-congregate shelter has been identified as a more humane and dignified approach to assist people who, in some cases, may not otherwise want to engage in shelter services or come inside from the elements. It was with this in mind when the SNOFO application was submitted and the DHS RFP was designed.

Permanent Housing Options: Arlington County relies on several permanent housing options for people experiencing homelessness:

- Short-term rental assistance aimed to prevent homelessness and assist households in stabilizing housing.
- Rapid Rehousing, which pairs housing in the market with short-to-medium term rental assistance and supportive services. Households typically compete for housing in the market and look for long-term affordable options which they can sustain after their rent assistance ends. For some households, they may transition to other available subsidies or more intensive services if appropriate.
- Permanent Supportive Housing for people experiencing chronic homelessness and living with a disability. Housing is deeply affordable through a combination of unit underwriting and local or Federal assistance to assist people with very low to no incomes. The majority of PSH units are scattered site, utilize tenant based rental assistance and rely on formal and informal relationships between CoC and PSH providers and housing developers.
- Housing Grants is a local subsidy program that offsets the cost of housing for working families or households living with a disability.
- Housing Choice Vouchers (formerly Section 8) are Federal subsidies that offset the cost of housing for low income renters, and are often limited by the low turnover and limited supply of new vouchers in the program.

Supportive Services: Residential services are available in a number of local affordable housing developments, but not all. Some tenants receive other supportive services through the community. For example, Arlington County provides an array of economic, family and behavioral health resources for children, adults and seniors. Other tenants receive supportive services through homeless housing programs (if experiencing homelessness).

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

In Arlington, emergency shelter characteristics may limit access and capacity for those experiencing homelessness:

- Individuals may not want to reside in congregate shelter space where there are limitations to privacy and personal space.
- Congregate shelter space may also be difficult for people who have sensory, cognitive and mental health needs that are strained by noisier and busier community spaces.
- Congregate spaces also limit access to live-in assistance or home health services options for older adults or people living with other medical conditions.
- Shelter capacity is capped by occupancy restrictions, making it more challenging to meet shifting demands as needs increase and decrease over time.

In Arlington, characteristics named below are linked with housing instability increases risk of homelessness. These add pressure on the existing shelter system – both in responding to needs of people newly experiencing homelessness and for those who are exiting homelessness to housing:

- **Rent burdened**: a household paying more than 30% of income on housing is at increased risk of homelessness.
- **Overcrowding**: a household living in a doubled-up situation is at high risk of homelessness. If the household is not on the lease or a welcome guest, the household could be asked to leave at any time.
- **High-cost housing market**: High rents in Arlington make it difficult to serve low-income households.

Identify priority needs for qualifying populations:

Priority needs for qualifying populations include both the following targeted groups and their subsequent needs:

- **Individuals or families experiencing sheltered or unsheltered homelessness**: Affordable housing that provides short, long or permanent services and permanent affordability are high-priority needs. Available housing must also accommodate flexible screening practices to account for existing rental barriers.
- **Individuals or families at risk of homelessness:** Two sub-populations have been identified as being particularly at-risk of homelessness:
    - Aging populations: Persons experiencing chronic homelessness and/or other low-income elderly persons require greater assistance and coordination to be able to attain or maintain safe, accessible housing where they can age in place. This includes assistance with accessing food, medical care, home health, activities of daily living, and transportation.
    - Large or multi-member households: In addition to unit affordability, larger units or single-family rentals are in short supply, limiting options for larger and multigenerational families.

- **Individuals fleeing or attempting to flee domestic violence**: Immediate access to safety planning and behavioral health supports for trauma associated with domestic violence are needs, along with short to long-term service and affordability needs.
- **Veterans**: Quick access to Veterans Affairs assistance, including health care, behavioral health care supports, and housing assistance that focuses on quick attainment and long-term stability of permanent housing are important to meet this population's needs.

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

Housing gaps were identified by utilizing annual CoC data to include Point-In-Time shelter and outreach capacity (HIC), as well as current (FY 2021) and targeted performance standards for length of homeless episodes and rates of permanent housing exit. This provided information to understand the current capacity to re-house persons experiencing homelessness and housing needed to improve system performance. In addition, County staff utilized information regarding availability of committed affordable housing units (CAFs) and future needs obtained through a recent Housing Needs Assessment, which was completed as part of a review of the County's Affordable Housing Master Plan.

Service gaps largely reflect qualitative analysis conducted with the CoC and community stakeholders in weekly case conferencing meetings focused on housing options for people experiencing homelessness, as well as community listening sessions.

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

Arlington will utilize a portion of HOME-ARP funding for the acquisition and/or development of non-congregate shelter (NCS) to serve qualifying populations or individuals referred through the County's Continuum of Care (CoC) Centralized Access System (CAS). These units will provide private, non-congregate accommodations as a temporary shelter resource and an alternative to traditional congregate shelter settings. The County will utilize a competitive process to select project partners. A portion of the funds will be used to provide supportive services for the individuals and families that occupy the NCS units.

Arlington County will issue a Notice of Funding Availability (NOFA) to solicit proposals for NCS projects. Eligible applicants may include nonprofit organizations, housing providers, or other qualified entities with experience serving HOME-ARP qualifying populations. Proposed projects may include the acquisition, rehabilitation, or new construction of facilities (such as hotels, apartments, or other structures) suitable for use as non-congregate shelter. Proposals will be evaluated based on criteria such as alignment with identified needs and gaps, project feasibility, capacity to deliver services, and consistency with HOME-ARP requirements. If an existing building is acquired and renovated for these units, the County will ensure the units are integrated without displacement of existing residents.

The selected project may include partnerships with service providers to deliver supportive services necessary to promote housing stability and facilitate transitions to permanent housing. These services may be funded through HOME-ARP or coordinated with other local, state or federal sources, to ensure that participants have the resources necessary to stabilize the transition. The community and interested stakeholders will have another opportunity to provide input throughout the NOFA and project selection process.

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

Arlington County did not utilize or distribute any HOME-ARP administrative funds prior to HUD's acceptance of the HOME-ARP allocation plan.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	$325,000		
Acquisition and Development of Non-Congregate Shelters	$2,307,502		
Tenant-Based Rental Assistance (TBRA)	$0		
Development of Affordable Rental Housing	$0		
Non-Profit Operating	$0	0%	5%
Non-Profit Capacity Building	$0	0%	5%
Administration and Planning	$0	3.8%	15%
Total HOME-ARP Allocation	$2,632,502		

Additional narrative, if applicable:

Arlington County intends to use $2,207,502 in HOME-ARP funding for the acquisition and/or development of non-congregate shelter (NCS) units to serve individuals and families in HOME-ARP qualifying populations. These units will be designed to support individuals experiencing homelessness or housing instability, including those who may not be well served in traditional congregate shelter settings and with the goal of reducing unsheltered homelessness.

Referrals to these NCS units will be coordinated through the Continuum of Care (CoC), and the County will utilize the Centralized Access System (CAS) to ensure individuals are in the qualifying populations that include those experiencing homelessness, survivors of domestic violence, veterans, individuals and families at risk of homelessness, and others. This process will be amended to incorporate other entry points based on the selected partner (i.e. area domestic violence hotline) and to prioritize households based on vulnerability and need while maintaining access for all qualifying populations.

Arlington will allocate up to $325,000 in HOME-ARP funds for supportive services to assist individuals and families residing in the HOME-ARP funded NCS units. These services could potentially include case management, housing navigation one-on-one support, emergency health services, behavioral health support, and more. These supportive services will be supplemented with other local and regional resources to ensure continuity of care.

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:

Arlington County utilizes annual CoC data, including Point-in-Time counts, shelter and outreach capacity (HIC), length of homeless episodes, and rates of permanent housing exit. This data shows increasing demand across both sheltered and unsheltered populations, rising shelter entries, and limited exit pathways due to constrained affordable housing supply. Based on these trends, the County estimates that an 500 additional permanent housing options would be required to keep pace with increased performance and new shelter entries.

Arlington's CoC is committed to providing low-barrier, housing-focused emergency shelter for individuals and families when alternative housing options are not available. Feedback has consistently indicated that non-congregate shelter offers a more dignified, safe, and appropriate alternative for many individuals and families, particularly those with safety concerns, behavioral health needs, or barriers to engaging in congregate environments. As a result, the County has intentionally advanced non-congregate shelter as a preferred model within its system, not solely to fill a gap, but to improve the quality and responsiveness of shelter interventions and better align with the needs and preferences of those being served.

In FY 2025, the CoC operated four emergency shelters, two of which are congregate by design. In recent years, the County has expanded non-congregate shelter capacity through initiatives such as a HUD-funded Joint Transitional Housing–Rapid Rehousing project, which includes non-congregate shelter provided in master-leased apartments, and through the use of locally funded, overflow shelter resources for families. These efforts reflect a broader system shift toward providing more flexible, private shelter options.

Episodes of homelessness in Arlington County are often driven by affordability challenges, and this dynamic persists within the shelter system, where between 30% and 40% of households exit shelter with no cash income, making it more challenging to exit to permanent housing without financial assistance or a subsidy and sustain housing in the long-term. Together, these conditions highlight a structural mismatch between housing costs and household resources, underscoring the need for low-barrier stabilization options that do not rely on immediate access to income or availability of rental housing. While Rapid Rehousing provides an important pathway to permanent housing, it relies on households' ability to successfully lease units in a highly competitive market and may not fully address the immediate stabilization needs of all households. In this context, non-congregate shelter provides a critical bridge, providing private, flexible accommodations that support stabilization, reduce barriers to shelter entry, and better positions households to successfully transition to permanent housing.

Based on these findings, Arlington County's decision to fund non-congregate shelter, paired with supportive services, reflects a strategic evolution of its shelter and service delivery system. This approach expands available shelter options, enhances dignity and safety for program participants, and ensures that HOME-ARP-funded activities are responsive to the expressed needs and preferences of qualifying populations while remaining consistent with HUD requirements.

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:

Arlington County does not intend to use HOME-ARP funds for the production or preservation of affordable rental housing units. Instead, the County will utilize its HOME-ARP allocation to support the acquisition and/or development of non-congregate shelter (NCS) units and the provision of supportive services for qualifying populations. As such, no HOME-ARP-funded rental housing units will be produced through this allocation.

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

Arlington County is not pursuing affordable rental housing production with HOME-ARP funds. Based on the needs and gaps identified through the County's analysis, the primary priority is to expand access to low-barrier, non-congregate shelter options and supportive services for qualifying populations. This approach reflects a strategic shift toward providing more flexible, dignified, responsive shelter interventions that can better support individuals and families experiencing homelessness or housing instability.

By focusing HOME-ARP resources on non-congregate shelter and supportive services, the County aims to provide immediate stabilization for qualifying populations, particularly those who are unable to access or effectively utilize traditional congregate shelter or rapidly secure permanent housing due to affordability constraints.

Preferences

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

Arlington County does not intend to impose limitations that would restrict eligibility to one qualifying population. Rather, the County may apply preferences to prioritize assistance for certain populations based on identified needs and gaps, while ensuring that all four HOME-ARP qualifying populations remain eligible to apply for or be referred to HOME-ARP funded activities. This approach is consistent with HUD guidance, which requires that all qualifying populations have access to HOME-ARP projects and activities and prohibits the exclusion of any qualifying population from the program.

Arlington intends to utilize its existing pathways to emergency shelter access for these HOME-ARP activities. This includes the Continuum of Care's Coordinated Entry System or Centralized Access System (CAS), as the primary referral and prioritization mechanism for households experiencing homelessness and/or its locally operated Domestic Violence and Sexual Assault Hotline for survivors of DV. The CAS is inclusive of veterans, people with disabilities, transition aged youth, victims of domestic violence, families, etc. so the prioritization for HOME-ARP units will follow this same structure. The use of these existing access points will ensure that all qualifying populations are eligible for referral, while allowing the County to prioritize households based on vulnerability, service needs, and risk factors.

Arlington's CoC CAS admits people experiencing homelessness to its emergency shelter on a first-come-first-serve basis. It makes exceptions to this process based on assessed needs, including: a verified chronic health condition or disability which would worsen by experiencing unsheltered homelessness, pregnancy, being a recent victim of a crime, fleeing domestic violence, adults engaged in Adult Protective Services, and young adults aged 18-24. The DV hotline assesses callers for emergency shelter based on the level of risk, using the Lethality Assessment Protocol. Additional details can be found in the CoC CAS Policies and Procedures Manual.

Prioritization for qualifying populations to access HOME-ARP NCS units will be similar to the CAS methodology. Consistent with HOME-ARP requirements, this prioritization will affect only the order in which households are served and will not restrict eligibility for any qualifying population. Households from any of the four qualifying populations may be referred to and served through HOME-ARP funded activities, even if certain populations are prioritized based on demonstrated need.

While individuals and families at risk of homelessness may not be prioritized in the same manner as those experiencing homelessness within the CAS, the CoC provides a range of interventions to ensure these households have access to appropriate resources, including eviction prevention assistance, other forms of emergency assistance, and diversion services aimed at rapidly resolving the households imminent housing crisis. These interventions are incorporated into the broader referral and prioritization framework to ensure that all qualifying populations can access HOME-ARP-funded units.

> **Prevention Prioritization:** Homelessness prevention services seek to help households at-risk of homelessness maintain their existing housing and/or access alternative housing, prioritizing those for whom homelessness would occur but for the emergency assistance available to them. The CAS process assesses each household and determines the appropriate level of service provided.
>
> **Emergency Shelter Placement Prioritization:** Diversion is used as a systemwide strategy to prevent homelessness for people seeking emergency shelter by identifying immediate alternate housing arrangements and, if necessary, connecting them with services and financial assistance to help them return to or keep their existing permanent housing. Emergency shelter is used as a resource of last resort, prioritizing and utilizing shelter only for individuals and families with no other viable housing options.

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

Arlington County will utilize prioritization methodology outlined by the County's CoC Centralized Access System (CAS) to guide referrals to HOME-ARP funded NCS units. This prioritization framework is designed to ensure that limited resources are directed to individuals and families with the greatest needs.

The CoC's prioritization policy reflects both national best practices and local system conditions, developed based on a few factors:

1. The CoC worked to align prioritization practices with the Federal Strategic Plan to End Homelessness.
2. The CoC also participated in Community Solutions, Built for Zero Campaign to reach "Functional Zero" for homelessness based on the priority groups: Veterans, Chronic Homelessness, Families, and Transition Aged Youth.
3. The policy was based on vulnerability and risk factors associated with each of these sub-populations.

Through this framework, the CAS prioritizes households that are least likely to resolve their housing needs without assistance, including individuals experiencing chronic homelessness, households with disabilities, survivors of domestic violence, and households with little or no income. This approach directly addresses unmet needs identified in the County's gap analysis, including the mismatch between available housing resources and the level of need among the most vulnerable populations, as well as the limited ability of certain households to access or sustain housing without targeted intervention.

Consistent with HOME-ARP requirements, this prioritization methodology does not exclude any qualifying population from eligibility. Instead, it establishes a structured and transparent method for determining the order in which eligible households are served. All qualifying populations, including those experiencing homelessness, at risk of homelessness, survivors of domestic violence and human trafficking, and other vulnerable households, remain eligible to be referred to HOME-ARP-funded activities.

Arlington's experience achieving functional zero for Veterans due to the concerted and effective efforts of the CoC demonstrates the effectiveness of this approach. By aligning resources with data-driven prioritization and focusing on the most vulnerable households, the CoC is working to reduce homelessness among other targeted populations while maintaining system responsiveness. And while the overall numbers within some of these sub-population groups remain nominal, the CoC has maintained its commitment to prioritizing resources for these groups based on risk, vulnerability, and alignment with nationwide best practices and when resources are not sufficient to meet the full community's needs.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference.

Arlington County will utilize prioritization methodology outlined by the County's CoC Centralized Access System (CAS) to guide referrals to HOME-ARP funded activities. While this approach prioritizes households with the greatest vulnerability and needs, it does not exclude any of the qualifying populations from accessing HOME-ARP NCS units or services provided. However, the available HOME-ARP funds are not adequate to meet the needs of all people in Arlington, Virginia who are at-risk of or are experiencing homelessness. Therefore, the prioritization of these limited resources allows the County to maximize available resources and connect people to the most appropriate housing solution based on their unique needs and strengths.

Should the County effectively find housing for all qualifying populations that come through the CoC, the County will review potential referrals among those who are most at-risk of experiencing homelessness, beginning with those for whom RRH was not sufficient in stabilizing their housing needs long-term, and then more broadly to those who have requested prevention assistance through the CoC's CAS.

Arlington will also continue to leverage other federal, state and local other resources available to address the needs of qualifying populations, whether through the Federally funded Housing Choice Voucher Program, locally funded Housing Grant Program, homelessness prevention and diversion programs, and other supportive services. Local and state funding is also leveraged to assist people most at-risk of homelessness to maximize available homeless funding for people experiencing literal

homelessness. While these programs operate outside of HOME-ARP, they complement HOME-ARP-funded activities and expand the overall system capacity to serve a wider range of needs.

HOME-ARP Refinancing Guidelines

If the PJ intends to use the 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 with the PJ will refinance existing debt for a HOME-ARP rental project, including:

Establishing 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.

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.

State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.

Not Applicable.

Specify the required compliance period, whether it is the minimum 15 years or longer.

Not Applicable.

State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

Not Applicable.

Other requirements in the PJs guidelines, if applicable.

Not Applicable.

APPENDIX 1 – 2022 Consultation

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

Agency / Org Consulted	Type of Agency / Org	Method of Consultation and Feedback Received
AHC, Inc.	Affordable housing developer	Dec. 9 Listening Session - Highest need population is 30-40% below AMI, but most housing targets 60% or 80%. Generally seems very difficult to finance these higher need projects. More vouchers for these populations might be helpful - Most nonprofits in the County have strong eviction prevention programs so it's important for those programs to continue to be funded.
Alliance for Housing Solutions	Affordable housing advocacy organization	Dec. 9 Listening Session - High demand for affordable housing but there is low inventory and current prices are out of reach for many clients. - High demand for family size units, 3+ bedrooms. - Not all families and individuals qualify for Housing Grant subsidies. Need more funding for Housing Grants and expansion of eligibility requirements. - Proposed HOME-ARP funding not best suited for TBRA since it is one-time funding. - Housing locators available via service providers provide valuable service in finding housing. - Streamline the waitlist and application process for CAFs; create centralized system.
Arlington County CoC Housing Subcommittee	Homeless services providers	June 6 CoC Housing Subcommittee Meeting - Life skills are needed, advocating for yourself, and the financial piece such as budgeting (what are the priorities they need to spend on) is a struggle. - All of the listed services are needed, service navigation is definitely needed. Staff is needed to assess such as social workers trained in assessment to help residents identify what is needed to stabilize their housing. - Life skills and advocacy resonant as well as the ability to assess the needs of each tenant since they will all be different and then make that service available to them. - Employment piece is big, getting a better job or increasing their work skills. Finding jobs that are suitable to what they are able to do and helping them getting an application in for whatever they may need. - Concern about those who don't want to go through the County CAS system, especially those who really meet these needs with regards with disability.

Arlington Commission on Aging	Advocacy for aging population	Dec. 9 Listening Session - County should consider grants or loans to older adults on limited or fixed income for retrofitting costs so population can age-in-place. Many older adults are forced to sell and leave the County. - Affordable assisted living facilities is limited throughout county. - County should consider allowing rental assistance programs to support housing portion of assisted living. - In home care givers/case management support is needed to help aging community stay in their homes.
Arlington Neighborhood Village	Advocacy and services for aging population	Dec. 9 Listening Session - Landlords do not support renters in the way other services do to complete eviction prevention measures. County should consider connect people to eviction prevention strategies and making information easier to obtain. - It's hard for certain populations to get online information since there is a lack of computer access or technology literacy.
Arlington Partnership for Affordable Housing (APAH)	Affordable housing developer	Dec. 9 Listening Session - The County should consider targeting resources to support households that are doubled-up because rent is so expensive. - Additional case management support is needed to assist households in navigating rental assistance process.
Arlington Thrive	Emergency services for eviction prevention	Dec. 9 Listening Session - At risk of homelessness households are often overlooked in appropriation of resources, but it is a very large category of people. - Often seeing that households are struggling to meet necessary overhead because of high rent costs and limited supply of units for which they income qualify. - There is a growing aging population (not yet 65 and don't qualify for HG) that have limited employment options (due to health and education) and therefore limited income to support existing housing costs. May 12 Feedback Session - Based on population size and homelessness and persons with intellectual disabilities, there will be greater ongoing needs for resource and more so with increased homelessness among this population after eviction resources are depleted.
Capital Youth Employment Program	Services for disenfranchised families	Dec. 9 Listening Session - Many formerly incarcerated fathers have difficulty finding housing. Many are couch-surfing, but some rely on shelters and even then it's hard to find available

		beds. Also difficult for them to find the necessary information. - More outreach with the most vulnerable communities is needed so they're aware of available services. - Employment training, skill development through apprenticeship programs are good examples to address unemployment.
Doorways for Women and Families	Domestic Violence survivor services	Dec. 9 Listening Session - There is concern that County resources are not available to those recently released from jail/prison or psychiatric institutions. These households often have to become homeless in order to access assistance. - Homeless services facilities should be rethought to ensure that we can keep people safe in instances such as communicable disease, physical, auditory changes. - Safety upgrades are also needed for older apartments that pose a safety threat for domestic violence clients. - Support such as assistance completing applications for housing and rental assistance is needed for DV clients. Need to create units for DV clients near schools, public transit, etc. - There is an increased need for non-congregate shelter as a result of COVID, particularly for families. May 12 Feedback Session - Keeping people in homes is valuable for income earners below 50% AMI - Foundational services such as financial counselling, case management, connection to training and emergency assistance. Mental health services are in high demand. Critical needs are more complex and require more long-term support for sustainability.
Edu Futuro	Services for low-income residents	May 12 Feedback Session - Immigrant families need more services. - High dropout rates seen in schools and parents have difficulty finding jobs as a result of the pandemic. Eviction rates increasing will have a greater impact on lowest-income populations. Resource navigation is incorporated in case management; not stand- alone activity.
Friends of Guest House	Homeless services provider	Dec. 9 Listening Session - People with co-occurring challenges (substance abuse and mental illness) are particularly vulnerable. Many people in this category don't do well in congregate settings. May 12 Feedback Session
La Cocina VA	Employment services	Dec. 9 Listening Session

		- Mental Health services needs expansion, additional staffing needed. Mental health issues must be severe to qualify for assistance.
Latino Economic Development Corp.	Housing services	Dec. 9 Listening Session - LEDC gets many calls from people looking for affordable rental housing-constantly trying to refer people, but there isn't inventory. - Seeing an increase in households that are trying to purchase homes because their rent is becoming more and more unaffordable. These households also traditionally have bad credit and are not necessarily poor, but don't qualify for County assistance. - Increased funding for home improvement so households can afford to repair their houses is needed.
Legal Aid Justice Center	Immigration legal services organization	Dec. 9 Listening Session - Need to focus on educating tenants on their rights leading to empowerment. - Assist in the formation of resident associations to provide peer-to-peer training.
NAACP Arlington	Advocacy for persons of color, civil rights and fair housing	Dec. 9 Listening Session - County is behind on meeting master plan goals and particularly is not meeting goals associated with affordable homeownership. - There is a strong need for affordable housing for lowest income households (30% of AMI and below) as well as large families (3+ BR units). - County should consider allowing single individuals to be eligible for local Housing Grants program. - Single, homeless households struggle with next step housing because they often don't qualify for ongoing support. - There is a gap in the system related to formerly incarcerated individuals. Many times these individuals have poor credit, little to no income, and experience discrimination in the housing system. Without specific supports, many times these individuals have to access the homeless system. - Additional advertising, marketing, and outreach resources is needed because many households don't know they are eligible for assistance. - Sex offenders and formally violent offenders need shelter. Not having such supports puts a burden on the system as the options are limited.
National Capital Treatment and Recovery	Recovery treatment provider	May 12 Feedback Session - Persons with substance use disorders are at greater risk and need services.

Project Peace	Services for victims of domestic violence	June 1 CDCAC meeting - Would recommend clarifying whether the CAF units would be set aside specifically for domestic violence survivors at imminent risk or more broadly victims of domestic violence. "Imminent risk" implies a certain level of emergency service needed, whereby the qualifying population definition seems to be broader. - Most housing interventions for survivors are referred after seeking housing after leaving their confidential shelter, funding is restricted to people who are in shelter. - If you build in a community space to the project that receives the HOME-ARP funds, then the residents living in HOME-ARP units will have access to other existing services in that space. - Would encourage the County to prioritize supportive services given the long list, since we can maybe only fund one or a couple.
Service Source	Services for persons with disabilities	May 12 Feedback Session - Persons with mental illness and persons with disabilities are at greater risk and need attention. - The Housing first model that the HOME-ARP Allocation Plan describes is valuable and effective for population that has co-occurring disorders. - Persons with mental illness and services for intellectual disabilities need resource navigation services, job skills and search assistance and other services such as financial counseling. The services are needed for independent living and eviction prevention. Since COVID there is an uptick in unemployment among Service Source clients. There are short-term jobs, but long-term sustainable jobs are needed.
Wesley Housing Development Corp.	Affordable housing developer	Dec. 9 Listening Session - Resident services/ case management are a large part of housing programs and we need to think how these services will combine. - County should consider buying down affordability up front for CAFs

The following organizations participated in one or more community meeting, but did not provide specific feedback:

- Arlington Community Foundation, Safety Net Providers group
- Ethiopian Community Development Council, Inc., Refugee resettlement agency
- Gilbane, Co., Affordable housing developer
- Just Neighbors, Immigration legal services organization
- National Housing Trust, Affordable housing developer

- New Hope Housing, Homeless services provider
- PathForward (A-SPAN), Homeless services provider
- Rebuilding Together, Housing rehab services for aging and disable population
- Shooshan Companies, Affordable housing developer

Stratford Capital Group Development, Affordable housing developer