

Department of Planning and Development Division of Housing and Community Development

Request for Proposals (RFP) Affordable Rental and Special-Needs Housing Development

November 2024

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The Division of Housing and Community Development (DHCD) is soliciting proposals to finance the development of rental and special needs units designed to serve low- and moderate-income households using funding from the Philadelphia Housing Trust Fund (HTF), Neighborhood Preservation Initiative (NPI), federal HOME and Community Development Block Grant (CDBG) funds. This Request for Proposals (RFP) is designed to assist in providing gap financing for rental projects that will seek Low Income Housing Tax Credits (LIHTC) from the Pennsylvania Housing Finance Agency (PHFA). PHFA's deadline to submit full LIHTC applications is February 11, 2025 by 3:00 pm.

Please note that any proposal that received a commitment or conditional commitment of HTF, NPI, HOME or CDBG funds for LIHTC rental development from DHCD in the past and that has not been awarded LIHTC by PHFA <u>MUST</u> submit a new proposal in response to this RFP.

Please note that any development with an existing commitment of a Four Percent or Nine Percent tax credit award from PHFA is NOT eligible for financing under this RFP.

Also note that the development of affordable units for which a developer is receiving a density bonus under the Mixed-Income portion of the Zoning Code is NOT eligible for financing under this RFP.

Proposals received in response to this RFP will be reviewed by an interagency group comprised of representatives of DHCD, the Commerce Department, PHDC, the Office of Homeless Services, and the Philadelphia City Planning Commission. Proposals submitted to the RFP should be generally consistent with the Rental Selection Criteria, Appendix pp. 13-23 in the City's *Annual Action Plan Federal Fiscal Year 2024 (City Fiscal Year 2025)*, which is available at https://www.phila.gov/documents/five-year-consolidated-plan-annual-action-plans-and-reports/.

CDBG, HOME, NPI, and a limited amount of Housing Trust Fund dollars are available to for-profit developers and nonprofit developers. The City may also allocate HOME-ARP funding to support eligible projects (please see HOME-ARP plan at https://www.phila.gov/departments/office-of-homeless-services/documents/publications).

<u>Certain Housing Trust Fund dollars</u> are available only to nonprofit developers. Since Low Income Housing Tax Credit developments are structured as for-profit entities, nonprofit entities seeking HTF earnings are eligible only if they meet the HTF partnership requirements and other HTF requirements detailed in Attachment A. DHCD will determine the funding source to be utilized for housing development projects.

Development Preferences

In 2016, the City and PHA completed an Assessment of Fair Housing (AFH). This AFH includes the detailed data analysis and comprehensive resident input used to identify a range of barriers to fair housing and access to opportunity. The City, PHA and a diverse set of stakeholders worked together to create goals and strategies to overcome these barriers (Goals/Priorities begin on page 317 of the AFH - https://www.phila.gov/media/20190502115754/afh-2016-for-web.pdf).

The City has established preferences for certain types of development projects to advance the AFH strategies and to align with PHFA development preferences. Applicants can submit projects that fall into multiple preferences.

- 1. Large Families Developments providing units with three or more bedrooms for large families.
- 2. **Senior Occupancy 62+ with Services** Developments must provide a range of services and access to amenities to promote independent living for seniors.
- 3. **Returning Citizens** Developments that set-aside units for individuals who were previously incarcerated.
- 4. **Permanent Affordability** Developments that commit to a minimum of 99 years of affordability.
- 5. **Very Low-Income Occupancy** Developments providing units serving populations less than 30% of median income.
- 6. Homeless and Special Needs Projects —Developments that provide permanent supportive housing for those individuals and families that meet HUD's definition of homeless (see Attachment B Definitions). Depending on HUD funding constraints, preference may be given to those projects seeking to serve a specific subpopulation generally this refers to households that meet the HUD definition of chronically homeless. Developers are encouraged to implement a Housing First approach (see Attachment B Definitions) and provide or arrange for supportive services for all participants necessary to maintain their housing and live independently.
- 7. **Affordable Preservation** Applications submitted under this 4% and 9% RFP that propose to extend the long-term affordability and habitability of a development and/or to prevent the likelihood of conversion to market-rate housing. These applications must be supported by a market study and capital needs assessment and will have a 40-year affordability period.
- 8. **High Opportunity Areas** (HOA) Currently defined as strong markets with access to a broad range of amenities but have limited or no availability of affordable housing. Also includes areas

experiencing a shift from a weak to a strong housing market with loss of affordable housing units. The HOA Map and Census Tracts can be found in Attachment C.

9. **The City's Place-Based Strategy Areas** — The following areas provide funding/leveraging opportunities: Sharswood Blumberg Choice, North Central Choice, Kingsessing Bartram Village Choice, and Yorktown Harrison Choice (See Place-Based Map in Attachment D).

General Program Requirements

Eligible Applicants

Applicants must be for-profit or nonprofit organizations or partnerships. While LIHTC projects are structured as for-profit partnerships in order to syndicate tax credit proceeds, the controlling entity of the partnership must be an eligible nonprofit entity in order to qualify for HTF earnings. Other types of entities are eligible for CDBG or HOME funds, as applicable. CDBG funds cannot be used for new construction developments by a for-profit developer.

Eligible Activities

The goal of the RFP is to identify projects that will create a diverse range of affordable rental and special needs housing opportunities for low- or moderate-income households. Household incomes must also be consistent with the requirements of the LIHTC program, and/or ACC's as applicable.

Under this RFP, gap financing will be provided for the development of eligible projects. Both rehabilitation and new construction housing developments are eligible under this RFP. HTF dollars (but not HOME or CDBG) may be used to support internal rent subsidies to ensure affordability at 30% of median income or below.

Only projects that expect to submit applications for Low Income Housing Tax Credits by February 11, 2025 are eligible to apply to this RFP. Applicants should familiarize themselves with PHFA's requirements and submit applications to this RFP that are eligible for funding from PHFA. The proposal submitted to PHFA should be consistent with the proposal submitted to this RFP in the development's program, plans, location, number of units, development entity, income mix and financing. The City reserves the right to withdraw its commitment of financing to a project submitted to PHFA that is inconsistent with the proposal submitted in response to this RFP.

<u>Please note that any development with an existing commitment of a Four Percent or Nine Percent tax</u> credit award from PHFA is NOT eligible for financing under this RFP.

Design Consideration

The City is committed to developing and preserving high quality affordable housing and expects proposals to benefit residents through positive health outcomes, lower energy costs and other quality-of-life benefits. Proposals must adhere to design standards listed in PHFA's Qualified Allocation Plan and aspire to building approaches that balance high-end aesthetics with cost

efficiency. Developers are encouraged to incorporate affordable luxury features in their projects. Strategies may include:

Site, Building, and Unit Design:

- Mixture of different unit sizes with an emphasis on family-size units (2-, 3-, 4- and 5- bedroom units)
- Access to natural light and views, including operable windows for all sleeping areas
- Direct unit access to outdoor spaces
- High quality fixtures and finishes

Location and Building Amenities:

- Proximity to public transit, parks, schools, and stores
- Lobby, courtyards, fitness and community rooms

Sustainability/Energy Efficiency:

- Use of high-end and low maintenance appliances
- Energy audits and modeling (EnergyWorks)
- Construction & Demolition Waste Recycling (for cost savings)
- "Green Lease" language to overcome split incentive
- Certification or consistency under LEED, EnergyStar, Enterprise Green Communities or other third-party rating system

Accessibility, Special Needs and Visitability

All affordable rental housing projects must meet the following Set-Aside Requirements:

- > Ten percent (10%) Physical Disability
- Four percent (4%) Hearing and Vision Disability
- Ten percent (10%) Homeless and Special Needs

To the extent feasible, all new-construction housing development projects must include visitability design features. This includes at least one no-step entrance at either the front, side, back or through the garage entrance. All doors (including powder/bathroom entrances) should be 32 inches wide and hallways and other room entrances at least 36 inches wide.

Rental Projects exceeding the 10 percent Special Needs and/or Accessibility requirements will be given priority consideration.

All Homeless and Special Needs units are required to be filled via referrals from the

Supportive Housing Clearinghouse. In many cases, individuals referred from the Supportive Housing Clearinghouse will come with a behavioral health service package. See Attachment A for specific HTF visitability requirements.

Applicants that are eligible and willing to participate in the **HUD Section 811 Demonstration Program** by providing units designated for persons with disabilities ages 18-61 will be given priority consideration.

Readiness to Proceed

Priority will be given to projects that are ready to go and can spend funding upon approval of LIHTC from PHFA. Projects that will not have site control as required by PHFA for its LIHTC RFP will not be funded. The purpose of this RFP is <u>not</u> to develop a pipeline of projects that will need gap financing in the future.

Maximum Funding Request

No project may apply for more than \$3 million in total subsidies administered by DHCD (CDBG, federal HOME, NPI and HTF). Proposals with requests greater than \$3 million from DHCD will not be considered.

The Commerce Department has set aside up to \$500,000 to fund the commercial/retail portion of Mixed-Use projects. To be eligible for this financing, the project must be located on or near commercial corridors and must include a description of tenant(s) proposed to occupy the space.

Financial Feasibility/Leveraging

Priority will be given to projects that highly leverage the City's gap financing. Projects that leverage higher amounts will be ranked higher. Projects with substantial financing gaps with unrealistic plans to receive commitments by PHFA approval will be ranked significantly lower.

Proposal Format

Proposals **should be limited to twenty (20) pages of double-spaced text**, excluding the required forms and exhibits. <u>Qualified applications must include the following sections, which should be clearly identified and submitted in the following order:</u>

1) Project Summary

Provide a short summary (one page or less) of the project on the Project Summary form (Exhibit A). Include the project name, developer, project location, number of units, number of accessible, special needs and visitable units, total project costs, and amount of subsidy requested.

2) Project Description

Describe the type of project and scope of activity being proposed, indicating:

Type of housing being developed (new construction, rehabilitation, preservation)

- Population to be served by this development, including an estimate of the number of housing units to be rented to each of the following income groups:
 - ➤ Household income <20% of area median.
 - ➤ Household income >20% and <30% of area median.
 - ➤ Household income >30% and <60% of area median.
 - ➤ Household income >60% and <115% of area median.
- Applicants MUST provide estimates based on these income categories. If the project proposes to serve households with incomes less than 30% of area median, the applicant must explain how these households will afford tax credit rents and describe any rental reserves, rental assistance, etc., to be provided.
- Describe the services to be offered to the residents and the funding sources for these services.
- Street address, zip code and police district of each property in the project.
- Current ownership of each property.
- Current zoning, use and occupancy status of each property.
- Site control, including documentation of options to lease or buy.
- Description of completed properties (building type, square footage, number of units by bedroom size, parking, lot size, etc.) Please provide renderings, site plans and floor plans if available.
- Site, Building, and Unit Design
- Location and Building Amenities
- Sustainability/Energy Efficiency
- For Mixed-Use projects, describe plans for the commercial portion of the project and the market analysis undertaken to inform the commercial use.

3) Neighborhood Context and Location

Is the project located in one of the City's neighborhood priorities (see Attachments C and D)? Does the project support past private or public investment in the community? Is the project part of a phased approach to housing and community development? Is the project a suitable strategic reuse of the site within the neighborhood?

4) Community Engagement

Project sponsors must seek local community input for their plans and share their proposals with community-based organizations **one year prior to** this RFP. Project sponsors must have conducted at least one community meeting with the community group(s) that represent the neighborhood where the project will be located. Please provide date and sign in sheet from the meeting and summarize any comments received from the community. If a virtual meeting was held, please provide the invitation to the meeting, list of attendees and any comments.

5) Budgets

Complete the budget forms listed below, which identify anticipated development and other costs for the project.

- The Development Pro Forma (Exhibit B), which identifies the total development cost and the sources and uses of funds.
- The Operating Budget (part of Exhibit B), to provide operating costs and cash flow over a 15-year period.
- Tax Credit Summary (Exhibit B), to provide details on the amount of tax credits being requested from PHFA, the equity raise (as cents on the dollar), and the amount of funds being requested (if any) from PHFA.

Provide supporting evidence of all funding commitments received, and a list of pending applications with dates of submission and expected awards. Applicants must submit a Letter of Intent (LOI) from an equity investor committing LIHTC syndication proceeds and the amount of equity expected to be raised.

For housing developments where the replacement costs exceed the Cost Containment Policy, the developer must utilize a competitive bidding process to procure and select a general contractor. For purposes of calculating project costs, the cost of environmental remediation, remediation of subsurface conditions, demolition of structures, and meeting requirements of the Philadelphia Historical Commission may be excluded from the total calculation. The developer must provide documentation to PHDC for associated costs for review and approval by PHDC staff. Note: developments meeting the Passive House Requirements for energy efficiency can exceed the Cost Containment Policy by 10 percent. Please be advised, PHDC does not grant waivers for the Cost Containment requirements.

6) Site Control and Timetable

Provide a detailed description of the project's site control, both at the time of application and anticipated at the time of PHFA LIHTC application deadline. Identify key benchmarks for project development, including financing, pre-development activities, entitlements (i.e. zoning & building permits), construction start, construction end and leasing.

7) Development Team

Provide a description of each member of the development team, to include sponsor or developer, attorney, contractor, architect, consultant, and management agent. Please provide the number of affordable rental projects that the developer or sponsor, and development consultant, if applicable, have: 1) completed; 2) are currently under construction; and (3) are requesting under this RFP. Describe the legal entity (owner) that will be formed to develop the project. For HTF funded-developments, indicate how a qualified nonprofit entity will be the controlling interest in the project. How does this venture further the developer's long-term mission or business plan?

Office of Economic Opportunity

The attached "Economic Opportunity Plan" (Exhibit C) details the procedures that must be followed to provide meaningful and representative opportunities for Minority, Women and Disabled Business Enterprise (M/W/DSBE) and diverse workers. If selected under this RFP, the Developer and/or General Contractor shall meet with Division of Housing and Community Development's (DHCD) Compliance Unit, to set Minority, Women and Disabled Business Enterprises as well as Workforce Development goals prior to submitting the Economic Opportunity Plan. Agreed upon goals will then be submitted to the Office of Economic Opportunity (OEO) for signature of the Deputy Commerce Director by the Compliance Unit then forwarded to the PHDC Board for approval.

Complete the required M/W/DSBE Participation Workforce Commitment form (Exhibit D), and include it in the RFP response. If Exhibit D cannot be completed because contractors, subcontractors, suppliers or vendors have not been solicited, complete the Contractor Compliance form (Exhibit E). Please provide a narrative about the proposed plan and process to solicit M/W/DSBE contractors. Include in narrative past experience in meeting M/W/DSBE participation goals.

Minority participation in all stages of the project is strongly encouraged, including but not limited to ownership/developer, general contractor, professional services, purchasing/vendors, construction labor and lease-up.

Threshold Criteria

The City has identified a minimum Threshold Criteria required for this RFP. Proposals that fail to provide the Threshold Criteria below will be deemed ineligible and will **NOT** be reviewed. The Threshold Criteria are as follows:

- Complete submission of all of the required forms:
 - Project Summary Sheet
 - Development and Operating Budgets
 - OEO Forms and plan to solicit and contract with M/W/DSBE contractors
- Tax Investor LOI and evidence of all funding commitments
- Preservation projects must submit a third-party construction cost estimate
- Timeline included in submission
- Evidence of site control
- Evidence of community engagement
- Request not to exceed subsidy limits

Proposal Evaluation

Proposals meeting Threshold will be evaluated on the following criteria:

1) Neighborhood Context, Design and Location

Appropriateness of the proposed development for the neighborhood. Discussion of housing market and location to amenities/opportunities. Location in one of the City's Preference Areas (High

Opportunity, Place-Based Priority, Mixed-Use). Evidence of conducting at least one community meeting including those held virtually. Site plan, building design and amenities. Impact on other public or private investment. Green or sustainable design elements such as LEED for Neighborhood Development.

2) <u>Developer Capacity and Track Record</u>

Strength and track record of the development and management team. Identification of non-compliance issues. Capacity to undertake new or additional projects. Ability to secure construction financing and equity financing.

3) Population Served

Preference for populations served (Senior, Large Families, Returning Citizens, Homeless/Special Needs), affordability (priority will be given to proposals serving households at or below 30 percent of AMI), supportive services to be provided, and marketability.

4) Site Control and Readiness to Proceed - presented in a detailed development timeline.

Status of site control and zoning. Please be advised that projects that have zoning in place will be considered more favorably. Status of other funding commitments. Other funding commitments should include documentation from funding sources. Evidence of operating subsidy commitments.

5) Development Budget

Should include all sources of financing and amounts. For example, total City Subsidy, Federal Home Loan Bank Funds, Limited Partner Equity, General Partner Equity, and Reinvested Developer Fee. Development Costs should include detailed construction cost, soft costs, financing fees, reserves, and syndication fees, etc. It should also include price per unit, price per square foot development, and subsidy costs, and a Letter of Intent (LOI) from an Equity Investor. The developer fee for LIHTC projects is to be consistent with the allowable amount approved by the Pennsylvania Housing Finance Agency.

6) OEO Responsiveness

Provide a detailed plan to meet or exceed goals, including past performance listing projects developed and goals achieved.

7) Project Design

Description of how the project incorporates any or all of the affordable luxury elements listed in the Design Consideration section.

Briefing Session

A pre-submission in-person Briefing Session will be held to answer any questions regarding this RFP. Interested parties are urged to attend this conference. You can register by emailing mirra.duprey@phila.gov.

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The Briefing Session will be held on Monday, November 18th at 2 pm at:

1234 Market St. 17th Floor Boardroom Philadelphia, PA 19107

You will be required to show ID at the Security Desk to access the building.

Proposal Submission

Proposals must be in the format described above and must be received <u>no later than midnight</u> <u>on Monday, December 16, 2024.</u>

Applications must be submitted on-line by clicking the Online Submission button located under the RFP for Affordable Rental and Special-Needs Housing Development on the Funding Opportunities webpage of PHDC's website:

Questions related to the RFP may be directed to Mirta Duprey, at 215-686-9770, or to mirta.duprey@phila.gov. Questions must be submitted in writing by Friday, November 22nd. Answers to all questions received will be posted on the DHCD and PHDC websites by Wednesday, November 27th.

<u>Proposals received after the deadline will not be accepted and will not be reviewed</u>. The City assumes no liability for costs incurred in proposal preparation. The City reserves the right to accept or reject proposals or to seek additional information from any applicant. The City is under no obligation to award all available funds through this RFP and reserves the right to reallocate funds between funding categories.

Attachment A

Housing Trust Fund Requirements

Projects seeking Housing Trust Fund (HTF) assistance from this RFP must meet the legal requirements of the HTF, including:

- Development by a nonprofit organization, or a joint venture in which a nonprofit organization is the controlling partner with demonstrated capacity. No funding will be provided for a project sponsored by a nonprofit entity that is controlled by either a for-profit or a public entity.
- Adherence to the "Equal Opportunity/Affirmative Action Requirements and DHCD Policies" set forth in the City's Annual Action Plan Federal Fiscal Year 2020 (City Fiscal Year 2021). Selected developers must comply with other requirements, such as the Equal Opportunity Plan and the Economic Opportunity Plan required by ordinance 060226-AA and 210203, as applicable. Developers must also comply with the Antidiscrimation Policy Relating to the Participation of Minority, Women and Disabled Owned Businesses in City Contracts required by Executive Order No. 1-21.
- Meeting the accessibility and visitability requirements of the HTF as defined in local ordinance and the Mayor's Executive Order. To the extent feasible, all new construction units must be made visitable. This includes:
 - One zero-step entrance to the dwelling that will permit a visitor using a wheelchair to enter the main level floor of the dwelling through a doorway entrance that has a minimum 32" opening.
 - A usable path of travel throughout the interior main level floor that is no narrower than 36" at any point except for interior doorway openings with a minimum 32" opening.
 - A powder room on the main level floor that has a doorway entrance with a minimum 32" doorway opening, sufficient space to close the door while inside the powder room, a minimum 30" x 48" floor space clearance, and reinforced walls for future installation of grab bars to provide access to the toilet if necessary.
- Meeting the requirement that households benefiting from the housing development pay no more than 30 percent of their income for housing, unless allowed by another federal or state funding source.
- Serving households with a maximum income of 115 percent of Area Median Income (AMI).

The HTF requires that 50 percent of all program funds, including housing production, home repair and homeless prevention, on a yearly basis be used for programs and projects that benefit households with incomes, adjusted for size, equal to or less than 30 percent of the Philadelphia area

median income, and 50 percent be used to benefit households with incomes between 30 percent and 115 percent of AMI. Serving households at or below 30 percent of the AMI is not only a requirement of the HTF, but a goal of this RFP. Proposals serving that population will be given priority in funding awards. In making HTF awards, the City reserves the right to adjust funding among affordable housing development categories, based on responses received through Requests for Proposals.

Attachment B

Key Homeless Service System Definitions

Homeless person

Persons assisted with permanent supportive housing must be experiencing homelessness, which is defined as any individual or family who lacks a fixed, regular and adequate nighttime residence, meaning:

- 1. Has a primary nighttime residence that is a public or private place not meant for human habitation; or
- 2. Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- 3. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Disabled Persons

Either the head of household or a person (could be a child) in the household must be disabled based on the following definition:

- 1. A disability as defined in Section 223 of the Social Security Act;
- 2. Having a physical, mental, or emotional impairment that (a) is expected to be of long- continuing and indefinite duration, (b) substantially impedes an individual's ability to live independently, and (c) is of such a nature that such ability could be improved by more suitable housing conditions;
- 3. A developmental disability as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act;
- 4. The disease of acquired immunodeficiency syndrome (AIDS) or any condition arising from the etiological agent for AIDS; or,
- 5. A diagnosable substance use disorder.

A disability may be physical or mental, including developmental, or an emotional impairment, including impairment solely due to alcohol or drug use. Persons living with HIV/AIDS are considered disabled for the purposes of this program.

Chronically Homeless Individuals/Families – HUD Definition

A person who is "chronically homeless" is an unaccompanied homeless individual or adult in a family with a disabling condition who has either been continuously homeless for a year or more OR has had at least four (4) episodes of homelessness totaling 12 months over the past three (3) years. An episode of homelessness is a separate, distinct, and sustained stay in a place not meant for human habitation, on the streets and/or in an emergency homeless shelter. A chronically homeless person must be unaccompanied and disabled during each episode. A disabling condition is defined as "a diagnosable substance use disorder, serious mental illness, developmental disability, or chronic physical illness or disability, including the co-occurrence of

two or more of these conditions." A disabling condition limits an individual's ability to work or perform one or more activities of daily living. Institution stays that are less than 90 days in duration can be included as part of an episode of homelessness.

Housing First

The traditional Housing First approach has two basic parts: First, individuals are rapidly placed and stabilized in permanent housing without any preconditions regarding income, work effort, sobriety or any other factor. Second, once in housing, individuals never face requirements to participate in services as a condition of retaining their housing. The first part, placement into permanent housing without preconditions, is an important priority to ensure that federal funds are allocated to providers that serve the most vulnerable homeless individuals.

Permanent Supportive Housing

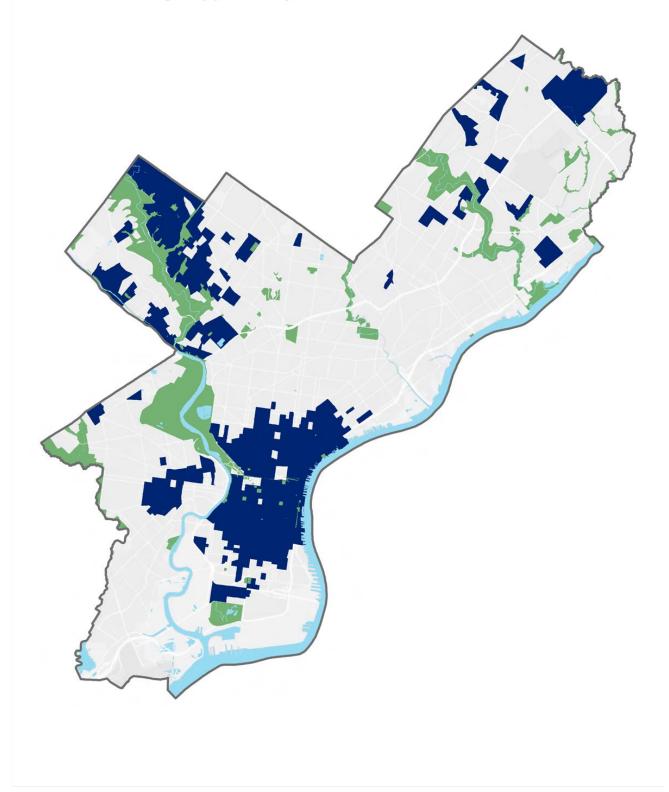
Permanent Supportive Housing for Persons with Disabilities is long-term, community-based housing and has supportive services for homeless persons with disabilities. This type of supportive housing enables special needs populations to live as independently as possible in a permanent setting. The supportive services may be provided by the organization managing the housing or coordinated by the applicant and provided by other public or private service agencies. Permanent housing can be provided in one structure or several structures at one site or in multiple structures at scattered sites. In this type of housing, no more than 16 persons may be housed in one structure — or an explanation is required as to how local market conditions necessitate a program of the proposed size, and how "neighborhood integration" can be achieved for the program participants.

Supportive Housing Clearinghouse

The Office of Homeless Services' Supportive Housing Clearinghouse serves as the centralized housing referral entity for Philadelphia's homeless system. The Clearinghouse manages the process of referring eligible households to available transitional housing (TH), rapid re-housing (RRH), and supportive housing (SH) programs as well as other housing resources committed to households who are or have experienced homelessness. Referrals are made based on funder required eligibility criteria and Coordinated Entry prioritization factors. Eligible households are experiencing street homelessness, currently reside in shelter, or safe havens; or are in homeless-dedicated housing programs (TH, RRH, PSH) and in need of a transfer to a more appropriate housing opportunity. Staff trained as Housing Assessors submit information on the household, their needs, and their level of vulnerability, into the Homeless Management Information System. The HMIS uses that information to determine what housing opportunities they are eligible for. When a vacancy is available, the highest priority household within those who are eligible is offered the housing opportunity.

Attachment C

High Opportunity Areas and Census Tracts



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Attachment D

Place Based Strategy Areas

