
Substantial Amendment

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



WYOMING COMMUNITY DEVELOPMENT AUTHORITY

■ EST. 1975 ■

Background

WCDA is proposing the following substantial amendment to re-distribute the funds of the HOME-American Rescue Plan Act (ARP) of 2021 allocations authorized under Section 3205 of the American Rescue Plan Act of 2021, Public Law 117-2, enacted on March 11, 2021. This proposal qualifies as a substantial amendment based on the following criteria found in CPD Notice 21-10:

“A substantial amendment is required:

- **If a PJ changes the method of distributing funds;**
- **To carry out an activity not previously described in the plan;**
- **To change the purpose, scope, location, or beneficiaries of an activity;**
- **To add new preferences or method of prioritization not previously described in the plan; and**
- **If the proposed change triggers a substantial amendment under the PJ’s citizen’s participation plan (CPP)”**

WCDA's original plan details the funding strategy for the HOME-ARP Allocation Plan. This original plan had a substantial amount allocated into Tenant Based Rental Assistance (TBRA) and a small amount allocated to Non-Congregate Shelter (NCS), as shown in the following table:

Use of HOME-ARP Funding	Funding Amount	Percent of Grant	Statutory Limit
Supportive Services	\$3,159,575		
Acquisition and Development of Non-Congregate Shelter	\$630,463		
Tenant-Based Rental Assistance (TBRA)	\$1,383,539		
Nonprofit Operating	\$369,540	5%	5%
Nonprofit Capacity Building	\$369,540	5%	5%
Administration and Planning	\$1,108,622	15%	15%
Total HOME-ARP Allocation	\$7,390,819		

NOTE: The initial allocation total was revised by HUD and reduced from the original allocation amount of \$7,390,819 down to the current amount of \$7,239,986.

Proposed Substantial Amendment

The following outlines how WCDA intends to reallocate funds to provide increased supportive services and non-congregate shelter in response to the continued impact of the COVID-19 pandemic:

1. Remove the Tenant-Based Rental Assistance (TBRA) allocation and redistribute it to the following areas:

- a. Supportive Services
- b. Non-Congregate Shelter (NCS)

WCDA believes that the need for short- and medium-term rental assistance could be more effectively addressed through HOME-ARP Supportive Services, rather than TBRA. WCDA has also seen a rising demand for NCS, as reported by public input and consultations with stakeholders.

WCDA has maintained the 5% allocation for non-profit operating costs and capacity building and 15% for administration and planning. This results in the following revised allocation of HOME-ARP funds:

Amended Budget Table

Use of HOME-ARP Funds	Original Funding	Amended Funding	% of Grant	Statutory Limit
Supportive Services	\$3,159,575	\$3,429,990	47%	
TBRA	\$1,383,539			
NCS	\$630,463	\$2,000,000	28%	
Non-Profit Operating	\$369,540	\$361,999	5%	5%
Non-Profit Capacity Building	\$369,540	\$361,999	5%	5%
Admin & Planning	\$1,108,622	\$1,085,998	15%	15%
TOTAL ALLOCATION	\$7,390,819	\$7,239,986		

Consultation Process

On Monday, June 24th, WCDA distributed a survey to our contacts to initiate the needs assessment process ahead of the community conversation held on Tuesday, July 16th. The survey aimed to gather input from as many residents as possible across our sparsely populated state. We reached out to 108 contacts through the survey and conducted several individual phone calls and meetings.

Needs assessment and Gap Analysis

The amounts below are based on input from consultations as well as data regarding

the need analysis of amounts and activities that other funding sources are or will likely be dedicated to. For example, the State of Wyoming receives a total of over \$9 million in HOME, Housing Trust Fund and Low-Income Housing Tax Credit funding to support the development of affordable rental housing while there is currently limited funding to supportive services and no other existing funding for non-congregate shelters with a growing need among the population. With the increase in scope and caseloads the funding for supportive services will create, it is critical that operating expenses and capacity building monies are available to agencies who may pursue NCS.

Consultations have shown a need for more financial assistance for non-congregate shelters and to the supportive services activities throughout the state of Wyoming. Homeless families and individuals who are very or extremely low-income households require a wide range of services and supports to remain stably housed. The highest priority needs that were consistently identified through outreach efforts were increasing access and availability to supportive services to the most vulnerable populations and a call for more non-congregate shelters. Wyoming currently has one long-term shelter in Casper and a few emergency and short-term shelters across the state. There is an increasing need for the addition of shelters across the state as our unhoused population continues to rise.

Preferences

WCDA currently has no preferences set for either Supportive Services or Non-Congregate Shelter. WCDA may potentially add a preference based on the requests received after conducting the application process.

While there are needs among all HOME-ARP QPs, information from the consultation sessions, stakeholder survey, and quantitative data analysis indicate that there are greater potential needs for three of the four HOME-ARP populations. In accordance with these findings, a preference may be provided for the following populations:

- Individuals experiencing homelessness, as defined in 24 CFR 91.5.
- Individuals at risk of homelessness, as defined in 24 CFR 91.5.
- Persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by HUD.

These preferences will allow organizations to prioritize affordable housing and supportive services for these populations.

Limitations

WCDA does not intend to set limitations at this time. If necessary, a limitation may potentially be added for NCS projects based on the type of requests received after conducting the application process. While there are needs among all HOME-ARP QPs, information from the consultation sessions, stakeholder survey, and quantitative data analysis indicate that there are greater potential needs for three of the four HOME-ARP

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Referral Methods

WCDA will require a waiting list for each project and/or program selected for funding. WCDA will ensure that all four QPs have access to project and program waitlists for all funding programs and projects.

Recommend Maintaining Funding Levels for OS/CB

As previously mentioned, WCDA will maintain the 5% allocation for non-profit operating costs and capacity building. Nonprofit capacity building and operations assistance will be available for competition through applications.

- In any fiscal year, nonprofit operating assistance or non-profit capacity building may not exceed the greater of 50% of the general operating expenses of the nonprofit organization, or \$50,000. If an organization applies for both operating assistance and capacity building assistance in any fiscal year, the aggregate total amount of assistance it may receive is the greater of 50 percent of the organization's total operating expenses for that fiscal year or \$75,000
- Maximum Request Amount: \$225,000 or 3 years of assistance

Public Process

As part of the HOME-ARP, HUD requires that proposed substantial amendments be made public and provide for a 30-day public comment period.

“In the event of a Substantial Amendment, the public notification process is the same as the Consolidated Plan, and WCDA will employ communications means designed to reach the broadest audience, and will include:

- Public notification of the Substantial Amendment, plan availability, and public meeting, made through:
 - Paid advertisements in the newspaper with the largest statewide circulation
 - Email notification to stakeholders, service providers, developers, and other email lists

- Notification on the WCDA website
- The affected program in cases of amendments of a program-specific nature will be the responsible entity for the public involvement process. However, in every case, amendment information will be posted on the WCDA website.
- **A 30-day comment period** after the draft plan is complete. An additional 15-day comment period will be held if significant changes are made as a result of the public process.
- A summary of the comments or views received and a summary of any comments or views not accepted, and the reasons why, will be attached to the Substantial Amendment 24 CFR § 91.115 (c)(3)."

WCDA will publish a 30-day comment period and public hearing notice in the Casper Star Tribune and the Wyoming Tribune Eagle, as part of the CPP requirements.

The public comment period occurred from October 18, 2024, to November 17, 2024

A hybrid public hearing was held to provide an opportunity for public comment on October 22, 2024, at 10:00 am.

No public comments were received.

Comments may also be provided to Veronica Ratigan, HOME-ARP Specialist, at ratigan@wyomingcda.com or home.arp@wyomingcda.com

AFFIDAVIT OF PUBLICATION

Megan Brace
WY Community Development Authority
State of Pennsylvania, County of Lancaster, ss:

Tatiana Dorval, being first duly sworn, deposes and says: That (s)he is a duly authorized signatory of Column Software, PBC and duly authorized agent of Casper Star-Tribune, a division of Lee Publications, Inc. A newspaper published in CASPER , NATRONA COUNTY, WYOMING, who declares that the attached Notice was published in said newspaper on the following dates :

PUBLICATION DATES:

Oct. 12, 2024

NOTICE ID: aom45zNtvqxp8Djrf6yo
PUBLISHER ID: COL-WY-0755
NOTICE NAME: HOME-ARP Amendment
TOTAL AD COST: \$116.29
FILED ON: Oct. 7, 2024

(Signed) Tatiana Dorval

VERIFICATION

State of Pennsylvania
County of Lancaster

Commonwealth of Pennsylvania - Notary Seal
Nicole Burkholder, Notary Public
Lancaster County
My commission expires March 30, 2027
Commission Number 1342120

Subscribed in my presence and sworn to before me on this: 10/15/2024

Nicole Burkholder

Notary Public
Notarized remotely online using communication technology via Proof.

NOTICE OF HEARINGS FOR THE STATE OF WYOMING HOME-ARP ALLOCATION PLAN AMENDMENT

The U.S. Department of Housing and Urban Development (HUD) requires that states receiving certain HUD funds prepare an Allocation Plan for the receipt of HOME Investment Partnership American Rescue Plan (HOME-ARP) funds.

The State of Wyoming is amending its HOME-ARP Allocation Plan. This Plan will be available for a 30-day public review period from October 18 to November 17, 2024. The Draft Plan documents will be available on our agency website as follows: Wyoming Community Development Authority (WCDA): <http://www.wyomingcda.com/affordable-housing>.

A meeting for the Annual Action Plan will take place on October 22, 2024, at 10:00 am local time in the WCDA Board Room, 155 North Beech St., Casper, Wyoming. The building and room are ADA accessible. Attendees may also join the meeting via Zoom at: <https://us06web.zoom.us/j/82102502888?pwd=ZqBTTkrv5peKbvrNpaRyGV4OSflty9.1>

You may also participate in the Public Hearing by calling 1-307-253-1019 and using PIN# 2020. TTY Relay Service is available in Wyoming by dialing 800-877-9975 (English) or 800-829-2783 (Spanish). For additional language assistance, please contact Tammy Krei at least 7 days prior to the meeting. Public comments on the Draft HOME-ARP Allocation Plan may be directed to:

Ms. Tammy Krei
Director of Housing & Neighborhood Development
Wyoming Community Development Authority
155 N. Beech Street
Casper, WY 82601
krei@wyomingcda.com
Published: October 12, 2024
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Director of Housing &
Neighborhood Development
Wyoming Community Development
Authority
155 N. Beech Street
Casper, WY 82601
krei@wyomingcda.com
October 9, 2024
NO. 567675