

**Alexandria, VA
HOME-ARP Allocation Plan
Via HUD Template**

Consultation

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

December 17, 2021 – Teams meeting with the Office of Community Services and solicitation of possible uses of HOME-ARP funds for their programs

January 6, 2022 – Presentation to the Alexandria Housing Affordability Advisory Committee and solicitation of comments for possible uses of HOME-ARP funds

January 13, 2022 – Teams meeting with the Partnership to Prevent and End Homelessness (Alexandria’s CoC). Presentation to the group and solicitation of possible uses of HOME-ARP funds for their programs

February 25, 2022 – Phone call with Volunteers of America to discuss possible uses of funds

March 2, 2022 – Email consultation with Carpenter’s Shelter to discuss possible funding of tenant-based rental assistance for persons in need of permanent supportive housing

March 3, 2022 – Teams meeting with Friends of Guest House to discuss possible funding of supportive services programs

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Partnership to Prevent and End Homelessness	Continuum of Care	Meeting; email	Individual members contacted staff afterward for more information
Carpenter’s Shelter	Homeless shelter and service provider	Meeting; email; phone call	Representatives contacted the Office of Housing about funding transitional and permanent supportive housing programs
Alexandria Redevelopment and Housing Authority	Public housing authority	Meeting	None provided
Friends of Guest House	Re-entry services and transitional housing	Meeting; email; Teams call	Representatives contacted the Office of Housing about funding

			transitional housing and supportive services programs
Volunteers of America/Alexandria Community Shelter	Homeless shelter	Phone call	Representatives contacted the Office of Housing about the program activity selection process
Department of Community and Human Services/Office of Community Services	City department/service provider	Teams call	Questions about how program worked
Alexandria Housing Affordability Advisory Committee	City Advisory Committee	Meeting	Feedback.

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

Three service providers contacted City staff after the upfront consultation to ask how HOME-ARP funds might be used to benefit the populations they serve. Carpenter’s Shelter requested funding for its permanent supportive housing program, which supports its extremely low-income clients on an indefinite basis. Friends of Guest House also requested funding for its supportive services program, which offers services, job training, and housing to justice-involved persons transitioning back into the community. The Guest House program is time-limited, with the intent to place its clients into permanent housing after they complete the program.

Staff considered both models and determined that a time-limited model was a more prudent use of HOME-ARP funds because an indefinite model would require other funding streams to support it after all HOME-ARP funds were expended and would only serve a small number of clients, while a time-limited model would pass multiple clients through before the funds were expended and would not result in clients who would need continuing subsidy.

Public Participation

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

- ***Date(s) of public notice: 3/17/2022***
- ***Public comment period: start date - 3/21/2022 end date - 4/22/2022***
- ***Date(s) of public hearing: 4/7/2022 4/23/2022***

Describe the public participation process:

The Draft Allocation Plan was released for public comment on March 21, 2022. Notice of the public comment period and date of the one of the public hearings was provided in English- and Spanish-language newspapers of general circulation, as well as via the City’s eNews mailing list, the Office of Housing’s social media accounts, and the Office of Housing webpage.

The Draft Allocation Plan was available online at the Office of Housing’s webpage and in hard copy at every City library and the Office of Housing. Translations and accessible versions of the document were available upon request. Copies were emailed to all the groups consulted as well as other community groups and requests were made for organizations to share the plan with their members and residents. Comments were accepted via email and postal mail, as well as in-person at both public hearings.

Public hearings on the Draft Allocation Plan were held during the April 7, 2022 Alexandria Housing Affordability Advisory Committee (AHAAC) meeting and the April 23, 2022 City Council Public Hearing.

Describe efforts to broaden public participation:

The Plan was presented for public comment at two public hearings and had a public comment period of 30 days. It was also distributed in conjunction with the Annual Action Plan so both plans could be reviewed at once.

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

At the AHAAC meeting, committee member Jan Macidull asked if the HOME-ARP funding would shift funding away from existing programs. City staff explained the HOME-ARP allocation was a separate funding source than the one that supported existing programs and would not affect those programs.

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

One comment was received via email asking why the Allocation Plan did not include ways to address zoning issues and their relationship to housing affordability. City staff replied that the Allocation Plan was solely focused on addressing the needs of qualifying populations and further information about the City’s plan for zoning changes could be found the Annual Action Plan.

Needs Assessment and Gaps Analysis

Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	68	#	77	#	#								
Transitional Housing	32	#	14	#	2								
Permanent Supportive Housing	8	#	39	#	2								
Other Permanent Housing	#	#	#	#	#								
Sheltered Homeless						86	110	2	#				
Unsheltered Homeless						#	11	1	#				
Current Gap										#	#	1	#

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	39085		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	2925		
Rental Units Affordable to HH at 50% AMI (Other Populations)	4975		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		5365	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		3205	
Current Gaps			#

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

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

Homeless as defined in 24 CFR 91.5

Compared to other jurisdictions, Alexandria has a very small unhoused population. The 2021 Winter Point-in-Time count recorded only 117 homeless households. 93% of households without children were sheltered, as were 100% of households with children. The Partnership to Prevent and End Homelessness estimates there are only 11 chronically homeless persons in Alexandria. Demographically, a majority of Alexandria's unhoused population is non-Hispanic Black or African-American, with non-Hispanics whites making up most of the balance.

At Risk of Homelessness as defined in 24 CFR 91.5

More than 60% of renter households in Alexandria with annual incomes below 30% AMI are severely cost burdened as are 30% of renter households between 30-50% AMI. In all, there are about 6,800 severely cost-burdened households in Alexandria, two-thirds of which are below 30% AMI.

On a population level, Hispanic households with incomes below 50% AMI are most likely to experience housing problems of any kind. In practice, these housing problems are cost burden and overcrowding as there are almost no housing units in Alexandria lacking in bathroom or kitchen facilities.

Hispanic and Black or African-American households are also disproportionately affected by severe cost burdens.

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

Alexandria has a very small population of individuals fleeing domestic violence. The Alexandria Domestic Violence Safe House served 75 individuals between July 1, 2020 and June 30, 2021. They included 42 women, 1 man, and 32 children. For safety reasons, other demographic information about these individuals was not provided. It is also unknown how many individuals fleeing domestic or dating violence, sexual assault, stalking, or human trafficking chose not to enter the Safe House and were housed elsewhere.

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

The City does not track the number of households who meet the HOME-ARP definition of other populations. However, many of the households who applied for the City's COVID-19 Emergency Rent Relief Assistance Program likely qualify for this definition. The program provided rental assistance to households with annual incomes less than 50% AMI whose

income had been affected by the pandemic. These households typically lived paycheck-to-paycheck and worked in the service sector, as gig employees, or as day laborers. The program received over 4200 applications, with 31% from Black or African-American households and 35% from Hispanic households. One-third of the applicants listed Spanish as their preferred contact language.

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 (Optional):

Enter narrative response here.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Alexandria's homeless population is small enough that the current number of shelter beds and short-term transitional housing units is adequate to shelter every person who wishes to be sheltered, but there is a lack of available long-term transitional housing, permanent supportive housing, and housing affordable to the lowest income groups. This makes it difficult for unhoused individuals and households to move from temporary shelter to permanent housing. Most shelters are congregate shelters, though non-congregate shelter was temporarily provided for those who needed to isolate or quarantine because of COVID-19 exposure or infection. Tenant-based rental assistance is extremely difficult to obtain because of the limited number of vouchers available from the local housing authority and a waitlist that numbers in the thousands. Supportive services are provided to those who want them, but without adequate amounts of affordable housing, the services become long-term supports, not short-term measures to support those who have obtained stable housing.

At Risk of Homelessness as defined in 24 CFR 91.5

There are very few market rate units affordable to members of this population and access to those can be further limited by poor credit histories or eviction records. Nearly all units in affordable housing developments have rents greater than members of this population can easily afford.

Members of this population rarely choose to enter congregate shelter.

Alexandria has one private boarding house which provides non-congregate shelter to extremely low-income individuals. It is almost always at full occupancy, which makes it difficult for new individuals to obtain housing there. It is also restricted to single individuals because of its small size.

Tenant-based rental assistance is difficult for all households at risk of homelessness to obtain because of the limited number of vouchers and long waitlists.

Supportive services are available from private non-profits and the City's Department of Community and Human Services, which allows households to self-refer and provides wrap-around services, but there are frequently long waits for intake interviews, restricting the number of households which can be assisted at any one time.

One of the qualifying populations who have trouble accessing services, however, are people exiting publicly funded institutions such as prisons or substance abuse treatment centers. The members of this population can find their access to housing and services is limited by any criminal histories they may have. This puts them especially at risk of homelessness. A limited number of non-congregate shelter beds are available to them as part of supportive services programs aimed at justice-involved persons, but they are not enough to meet the need.

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

Because of extremely small number of persons fleeing domestic or dating violence, sexual assault, stalking, or human trafficking in Alexandria and the limited demographic data about them, it is difficult to assess their unmet housing and service needs. It is unknown how many of these persons choose to enter congregate shelter. The City's Domestic Violence Safe House provides non-congregate shelter at an undisclosed location, but it has a limited capacity. Services are available to those in the Safe House and to those who contact the City's Department of Community and Human Services, but as with other populations, tenant-based rental assistance is extremely difficult to obtain because of the limited number of available vouchers.

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

While there are some market-affordable units available to members of this population, historic rent trends and recent rising rents have considerably eroded the number of these units. Affordable housing developments are beginning to include more units affordable at 40% AMI, but the large amount of subsidy required for these units limits the number that can be produced.

As with other populations, members of this population could choose to enter congregate housing but do so only rarely.

Currently, there are no non-congregate shelters that serve these other populations, though the City recently approved a co-living ordinance that allows for the creation of dormitory style housing in the city, which may widen the available pool of non-congregate shelter.

As previously noted, tenant-based housing vouchers are extremely difficult to obtain for members of all populations.

As with the households at risk of homelessness, services are available to this population, but high demand makes it difficult for households to access them in a timely manner.

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

The main gap in Alexandria's shelter and housing inventory is a lack of housing affordable to the lowest income groups. While tenant-based vouchers or committed affordable housing targeted on extremely low-income households provide some help, both of those resources are in short supply and inadequate to meet the demand.

Alexandria has sufficient shelter beds for its unhoused population but lacks in affordable units for those making the transition from shelters to permanent housing (which is also in limited supply). This makes it difficult to place households in housing in Alexandria without outside support. The number of permanent supportive units is also far below the demand. For every opening in a supportive housing program there are five to ten applicants.

While Alexandria is working to preserve and increase its stock of affordable housing, the number of committed affordable units in the city is far below the demand. The number of market-affordable units available in the city has dropped dramatically in the last twenty years, driving up demand for affordable units and forcing many low-income households to either relocate outside the city, live in overcrowded conditions to afford the rent, or become rent-burdened.

More than 60% of renter households below 30% AMI are severely cost burdened as are 30% of renters between 30-50% AMI. In all, there are about 6,800 severely cost-burdened households in Alexandria. In comparison, there are approximately 3,800 committed affordable units in the city. Many of these units have long waitlists of households in need of affordable housing.

In addition to cost burden, crowding is a problem for lower-income households. Often multiple families will share one unit or large families will occupy units with insufficient space for the household.

Tenant-based rental assistance is only available through the Housing Choice Voucher program. The supply of vouchers is limited and ARHA's current waitlist has 23,500 households on it.

Alexandria has a fairly well-coordinated service delivery system for homeless households, households at-risk of homelessness, and those fleeing domestic violence. Households in need of assistance will be referred to the Department of Community and Human Services for comprehensive assessments of their needs and provided with resources tailored for their needs. Households can self-refer or referrals can come through shelters, schools, churches, and other social service providers. Households in other populations can still obtain services, but it is more difficult because wrap-around services are not provided for them.

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

Households living in doubled up and/or overcrowded housing situations, households with special needs such as mental illness, substance abuse, HIV/AIDS, low-English proficiency households, households with undocumented members, and households which have experienced homelessness in the past are more likely to experience housing instability and have an increased risk of homelessness.

Identify priority needs for qualifying populations:

The priority need for all qualifying populations is permanent housing available to the lowest income groups, especially those at 40% AMI or below. For homeless populations or those leaving publicly funded institutions transitional and permanent supportive housing are high priorities as well. Households at risk of homelessness and members of other qualified populations have a high need for tenant-based vouchers to make up the gaps between what they can pay and current rent. Because survivors of domestic and sexual violence can be of any income level, it is difficult to judge what their housing needs might be, but transitional housing and supportive services will benefit them no matter their income level.

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

Data from the 2013-2017 Comprehensive Housing Affordability Strategy (CHAS), the 2015-2019 American Community Survey (ACS), and the City's own records show a large demand for housing affordable at the lowest income levels and a small supply available. This gap cuts across qualifying populations.

A need for tenant-based rental assistance also cuts across qualifying populations. The limited supply of vouchers available and the length of the waiting list illustrate this need.

The City has an adequate amount temporary congregate shelter for its current population of unhoused people (based on the 2021 Point-in-Time count) but lacks in the amount of affordable appropriate permanent shelter for them, leaving them in limbo. An increase in the amount of non-congregate shelter available would be beneficial in that it would provide another rung in the ladder to permanent shelter.

While service delivery for some members of other populations is imperfect, most households in qualifying populations can access coordinated service delivery systems. However, these services are in constant demand, straining resources. Bolstering those resources would allow for more assistance to be given, especially to those who have the most difficulty accessing services when re-entering the community after leaving a publicly funded institution.

HOME-ARP Activities

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

As part of its consultation process with groups, agencies, and organizations serving qualifying populations, the City solicited program ideas and worked with groups who asked for HOME-ARP support to refine these ideas and determine if they could benefit from HOME-ARP funding in both the short and long-term.

The City is aware there are currently multiple affordable housing projects underway or being planned in Alexandria, but most of them have only a small number of units designed as deeply affordable. However, there is one project where one-quarter of the units will be affordable at 40% AMI. As such a deep level of affordability can only be supported through subsidies, the City has selected this project for HOME-ARP funding in order to achieve its stated goal of providing more units for the lowest-income levels.

The City also consulted with providers of supportive services, including those who focus on persons exiting publicly funded institutions. While some providers focused on providing permanent supportive housing, others used a service delivery system with a focus on providing services, including housing, on a time-limited basis while their clients gained self-sufficiency and obtained permanent housing. In order to use HOME-ARP funds to benefit the greatest number of individuals, the City will work with providers who use the time-limited model.

Describe whether the PJ will administer eligible activities directly:

The City plan is to award funding to non-city organizations and not administer the activities directly.

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

No funds were provided to a contractor or subrecipient.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 224,322		
Acquisition and Development of Non-Congregate Shelters	\$ #		
Tenant Based Rental Assistance (TBRA)	\$ #		
Development of Affordable Rental Housing	\$ 1,906,734		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ #	# %	5%
Administration and Planning	\$ 112,161	5 %	15%
Total HOME ARP Allocation	\$ 2,243,217		

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

The City intends to use a majority of its HOME-ARP funding to address the shortage of affordable units in the city by supporting a 475-unit project where a quarter of the units will be affordable to households with incomes equal or below 40%. A small portion of the funding will be used to for supportive services and administrative costs.

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

The main needs identified in the gap analysis that qualify as eligible activities are housing production, tenant-based rental assistance, and supportive services for certain subsets of qualifying populations. The City has chosen to prioritize housing production and supportive services, as these will be the most efficient use of HOME-ARP resources. The production of new units will provide housing for those in the lowest-income groups for a long period of time. Supportive services for those exiting publicly funded institutions will assist those who traditionally have a difficult time obtaining services and housing but will also be time-limited to allow for more households to be served. The desire to serve as many households as possible is why time-limited services we chosen over tenant-based rental assistance as a gap to be filled; a household’s need for rental assistance might be indefinite, while services that are linked to a set time period or goal allow for turnover. Tenants who receive rental assistance might also need assistance that continues beyond the amount of time that can be funded, while time-limited services can be phased out as funds become depleted.

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:

It is estimated 30 units will be produced using the City's HOME-ARP allocation.

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

The City hopes to provide 9 units to households at or below 60% AMI and 21 units to households from qualifying populations. As the priority need for all qualifying populations is housing affordable to households at 40% AMI or below, the 21 units will help address that need. The other 9 units will provide affordability to a slightly higher income group while helping to cross-subsidize other units.

Preferences

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

Preference for housing will be given to qualifying households living in overcrowded conditions, severely cost-burdened households under 50% AMI, and/or households under 50% AMI who were eligible for City or State emergency rental assistance. Households under 50% AMI on fixed-incomes will receive equal preference as households who were eligible for emergency rental assistance.

Supportive service programs will have a preference for individuals exiting publicly funded institutions of care.

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

The categories identified as preferenced for housing are primarily groups who were heavily affected by the pandemic, both by business closures and COVID-19 infections. The loss of income caused by business disruptions pushed many of these households into a state of housing instability and a risk of homelessness because of it. While households with fixed incomes were less likely to be directly affected by the pandemic, rising costs and rents have caused housing instability for many of these households.

While the chosen waitlist preferences are not specifically targeted at populations with incomes of 40% AMI or below, based on what we know from CHAS data and those who applied for the City's emergency rental assistance program it is very likely those with the highest preference scores will come from extremely-low income households. For example, there are 6,800 severely cost-burdened households in Alexandria, approximately 4,500 of which are below 30% AMI. The ACS estimates there are 1,450 severely overcrowded households in Alexandria. Areas with high rates of COVID infection caused by overcrowded living conditions were primarily concentrated in the areas of Alexandria with the lowest incomes. These were the same areas that a majority of the applications for the City's emergency rental assistance came from.

Individuals leaving publicly funded institutions are often excluded from service delivery systems and housing assistance programs. As HOME-ARP is one of the few programs to explicitly include this population in its list of eligible populations establishing a preference will fill a gap in existing assistance programs.

Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

At this time the referral methodology has not been defined

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

At this time the referral methodology has not been defined

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

At this time the referral methodology has not been defined

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

At this time the referral methodology has not been defined

Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

At this time the City does not plan to limit eligibility beyond the HOME-ARP requirements for qualified populations to be served with these funds.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

At this time NA

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

At this time NA

HOME-ARP Refinancing Guidelines

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

Enter narrative response here.

- ***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.***

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

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

Enter narrative response here.

- ***Other requirements in the PJ's guidelines, if applicable:***

Enter narrative response here.