



State of Maine HOME-ARP Allocation Plan

FY 2021

Prepared by
Maine State Housing Authority
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mainehousing.org | 207-626-4600

HOME-ARP Allocation Plan Template

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-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further 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: Maine Non Entitlement, Maine State Housing Authority
Date: 1/4/2022

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, veterans’ 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:

Maine State Housing Authority (MaineHousing) conducted consultation sessions with stakeholders from the recommended entities.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Maine Continuum of Care (MCoC)	Continuum of Care	Virtual meeting with 59 people attending	Continue with rental assistance adding a way to reevaluate a person's need and income. Look at what is missing through racial equity lenses and fund what's missing. Fund Security Deposit Assistance. Landlord outreach to address landlord fear. Supplement income gaps with rental assistance. Holistic Help, budget funds for case managers in shelters and for outreach. LIHTC Housing that is welcoming to the homeless population and voucher holders. More affordable housing units are needed. Fund RR Housing and wrap around services with additional funds for more outreach workers. Use funds to Rehab buildings. Fund housing for low income population with relaxed criteria.
Maine Shelter Network	A Network composed of 20 or so active participating agencies. Volunteer participants represent single adult shelters, family shelters, shelters for domestic violence families, substance abuse shelters and youth shelters.	Virtual meeting with 20 people attending	More units of affordable housing split between supportive and non-supportive units. Non-supportive units are needed for people who are homeless due to COVID or other circumstances. Mixed use of affordable housing comprised of both permanent supportive units and non-congregate shelters. There is a need for more non-profit housing providers. Create more transitional housing. More shelter beds with a strong clinical framework operating 24/7. More S.R.O.s are needed. If eligible, additional supportive units for youths sharing space with a roommate (a best practice). Additional medium tiered housing. More shelter beds in rural areas. More navigators. Tiny homes that are handicap accessible. Additional low barrier units. Additional work force housing.

<p>Veteran Committee of the Maine Continuum of Care</p>	<p>A collaboration of several agencies and organizations to ensure that Veteran homelessness is rare, brief and non-recurring.</p>	<p>Virtual meeting with 20 people attending.</p>	<p>Funding to combat the lack of affordable units, construction of additional affordable, safe and quality housing. Purchase hotels. Develop a project that has units accepting VASH and people with mixed incomes for Veterans. Funding for a project that has a portion of the units accepting project based vouchers, a portion for people who need support services and a portion that provides non-congregant shelter beds. More projects on the idea of Cabin in the Woods.</p>
<p>Advocates and People with Lived Experience</p>	<p>Group of people with lived experience</p>	<p>A virtual meeting with 13 people attending.</p>	<p>Work with local landlords to repair and bring units to code. Purchase hotels in different areas of the state, add cooking ability to each room making it an efficiency. Supportive and emergency housing units that give people a place to figure things out. Additional warming centers. More projects like the housing trust fund. Look for old schools, stores and other empty buildings that can be quickly renovated, then you don't have to build. Hire temp. staff to help shelters advocate for the homeless. Rapid Rehousing works, give it more funding. Implement and enforce that landlords can't discriminate against voucher holders. Funds to help with cost for applying for rentals, back ground checks and credit checks. More navigators. Help with funds for required paper work for HCVs (birth certificates, ID cards and other documents). More houses that people can afford to rent and maybe some day buy.</p>
<p>BIPOC</p>	<p>Members of BIPOC Community and Agencies</p>	<p>Virtual meeting with 53 people attending.</p>	<p>There is a lack of affordable units, use funds to create more rental units for HCVs. Rehab. buildings, give funds to people to assist with</p>

	working with the BIPOC Population		renovations. Wrap around services are needed for people living in hotels. Invest in building affordable workforce housing. Partner with ERA and assist with rents. Purchase hotels.
Public Housing Authorities	PHA's from across the state of Maine representing both urban and rural areas.	Virtual meeting with 20 people attending.	Funding towards preventing strained relationships w/those providing housing in alternative settings, for example assisting with supportive services with people staying in hotels. Create more supportive housing with low barriers and access to services. Assist with operating costs of long term tax credit development projects. Housing that provides an interim stage/setting for people between shelters and permanent housing that provides support and assist in helping people become ready for permanent housing. Landlord incentives. Funding for Housing Stability-more funding for wrap around services and housing navigation. Invest money into a statewide network for eviction prevention and diversion. Funding to utilize PHA staff who are abreast of new lease programs. Low interest loans to PHAs to assist in the purchase of 4-8 unit buildings. PHAs can't compete with real estate investors which in turn will preserve affordable units. Money is needed to assist with reporting requirements for landlords. More PHA loan subsidies to assist with their buying units for VASH tenants. Fast track ways for PHAs to purchase larger properties to help with lowering the risk of purchasing, for example tax credits and low interest loans.
Developers and Community Action Agencies.	Mixed group of people representing	Virtual meeting with 24 people attending	Need more affordable units, develop additional LIHTC units. Build shelters with more capacity, provide

	<p>developers, providers and Community Action Agencies</p>		<p>additional training for shelter staff. Look at non-housing elements: Enhance public transportation in rural areas where housing is more affordable and fund childcare. Provide funds and work with GAs and DHHS to create a sustainable model for state wide funding to be the same across the state. Increase the amount of PSM in areas where there are not shelters, especially the rurals areas of the state. LTS tend to be single adults, there is a need for larger units for multi generational living and large families. Tie assistance (child care, health services and housing to where there are jobs). Give special considerations to special populations that have many barriers to housing (substance abuse and mental health). Consider supporting non-denominational shelters. Ways to get money out quickly: build tiny homes, convert hotels or similar real estate into living spaces, build single family homes with flexible financing, partner with companies to build work force housing, partner with UMA students, look at what other states are doing (Vermont), start an education campaign to show impact of lack of housing on work force and local economies and look into where people are converting shipping containers into housing and other innovative housing.</p>
<p>Statewide Youth Advisory Board</p>	<p>YAB</p>	<p>Virtual Meeting attended by two members of the YAB.</p>	<p>Provide housing units at affordable rates. Include funding for move in expenses like furniture. Ensure people participating in programs get the resources they need.</p>

If additional space is needed, insert image of table here:

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 to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes 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:

- ***Public comment period: start date - 1/4/2022 end date - 2/3/2022***
- ***Public hearing: 1/19/2022***

MaineHousing followed the State’s Citizen Participation Plan and reached out to local, regional and state organizations, the CoC and other interested parties. Public hearing notice was placed on the MaineHousing website, and stakeholder groups were notified of the hearing via email. The MaineHousing email list includes community leaders, developers, CHDOs, local housing authorities, advocacy groups, not-for-profit organizations, providers of housing and services to the homeless, CoC members, and interested individuals.

Describe any efforts to broaden public participation:

MaineHousing sought input from a variety of stakeholders during the fall of 2021 via virtual consultation sessions. During each of the eight virtual sessions attendees were asked:

- Where HOME ARP could have the greatest positive impact?
- What is the greatest opportunity to reduce homelessness in Maine?
- What is the greatest need?
- Where are the gaps?

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:

Enter narrative response here.

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

Enter narrative response here.

Needs Assessment and Gaps 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.

OPTIONAL 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	538	163	703	703	14								
Transitional Housing	517	179	575	575	36								
Permanent Supportive Housing	1272	307	1555	1555	284								
Other Permanent Housing						328 HH 1036 pp	1352 HH 1469 pp	315	157				
Sheltered Homeless						259 HH 803 pp	1153	103	4				
Unsheltered Homeless						1 HH 5 pp	136	10	4				
Current Gap										572	227	1203	1086

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

OPTIONAL 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	159,499		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	6,385		
Rental Units Affordable to HH at 50% AMI (Other Populations)	8,700		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		23,090	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		9,625	
Current Gaps			17,630

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:

Of the 2097 people counted as meeting HUD's definition of homeless during the 2020 Point in Time count, the following demographics were identified:

- 45% female, 54% male, 0.3% transgender, and 0.3% gender non conforming
- 96% non-Hispanic and 4% Hispanic/Latino
- 78% white 15% black, 0.1% Asian, 2% American Indian/Alaskan Native, 0.3% Native Hawaiiin/Pacific Islander, and 5% identified with multiple races
- 23% were under 18 and 7% were 18-24
- 7% were unsheltered
- 12% were chronically homeless

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:***

The most significant unmet need of those experiencing both sheltered and unsheltered homelessness is a lack of available housing units (both supportive and affordable). Many of those currently experiencing homelessness have access to rental assistance through various voucher and rapid rehousing programs but are unable to find a unit that is within the voucher payment standards. Based on longitudinal data, The Corporation for Supportive Housing estimates that 877 additional permanent supportive housing units are needed to meet the needs of homeless families and individuals requiring support to retain stable housing. A point in time analysis from 2020 shows a need of approximately 328 additional permanent supportive housing units and 984 affordable housing units.

Some unsheltered individuals have not had access to shelter beds due to a lack of shelter facilities and/or hotel rooms in the area in which they are located. There is also a need for additional resources such as recovery residences, where individuals with Substance Use Disorder can work on their recovery in a safe space.

For those at risk of homelessness the greatest need may be a lack of supportive and behavioral health services that assist individuals with behavioral health challenges in remaining stably housed. At this point, due to the Emergency Rental Assistance program, there is generally financial assistance available to those households experiencing financial difficulties that could lead to homelessness.

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:

There are currently a variety of existing and newly established rental assistance programs that provide assistance in remaining in housing and acquiring a new unit following a period of homelessness. These include Emergency Rental Assistance (ERA), traditional Housing Choice Vouchers, Emergency Housing Vouchers, Shelter Plus Care Vouchers, state-funded Bridging Rental Assistance Program (BRAP), and rapid rehousing programs established to assist those housed temporarily in hotels during the pandemic.

There are housing stability/navigation services available through shelter providers and through the Community Action Agencies that administer ERA. The State of Maine and MaineHousing have pledged funding to a new statewide housing navigation pilot program that will establish a new system of navigators around the state who will assist families in obtaining a new unit, with a special focus on those households who have been provided with a voucher but were unable to find housing.

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

While there are never enough shelter beds to house all individuals experiencing homelessness in the state, currently many people are being housed in hotels as overflow from shelter facilities that had to reduce bed capacity due to social distancing requirements from the CDC. Based on recommendations from Corporation for Supportive Housing during the Maine Homeless System Re-Design Initiative from June 2020 – June 2021, the state also initiated a homeless diversion program which has allowed some people to find alternatives to a shelter bed. The plan is to strengthen this program in the coming year through additional state funds to relieve some of the pressure off the shelters around the state

Identify the characteristics of housing associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

Not Applicable

Identify priority needs for qualifying populations:

In the Final Report and Recommendations for the Maine Homeless System Re-Design Initiative CSH indicates the need for an additional 877 units of permanent supportive housing. This need was reiterated in each of the 8 stakeholder feedback sessions MaineHousing conducted in the preparation of this allocation plan. The need for additional shelter beds was also indicated in half of the sessions. Therefore we have chosen to focus the majority of these funds on those two areas. There was also an acknowledgement that in order to draw in new, more mission-driven

development and service provider partners it would be beneficial to offer some capacity-building funding.

Although there were recommendations around rental assistance and services such as housing navigation, there are both new and ongoing funding sources that address those 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:

The level of need and gaps in shelter, housing and service delivery systems were determined using data from the statewide Homeless Management Information System, Maine's Point in Time and Housing Inventory Count, housing data from the 2019 American Community Survey (ACS) and the 2014-2018 Comprehensive Housing Affordability Strategy (CHAS), and a gaps analysis performed by the Corporation for Supportive Housing (CSH) as part of the Maine Homeless System Re-Design Initiative (Final Report and Recommendations June 2021). The determination of how to most effectively utilize this funding was determined through a series of stakeholder meetings in October and November 2021.

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:

MaineHousing will draft a Request For Proposals (RFP) in order to choose projects and developers to receive HOME-ARP awards. The applicants must show MaineHousing how the funding will be used to create affordable housing and provide services. The applicants will be scored according to a rubric which includes points for criteria such as developer experience, capacity building, services offered, housing need, readiness – including meeting land use requirements, and additional funding.

Applicants must submit application materials by a specific deadline. Applications will be scored by a small group of MaineHousing employees representing different areas of expertise.

Applicants will be awarded funding in order of scoring results until there are no remaining funds available.

The applicants will be developers who must describe their own experience as well as that of any service providers, contractors, or consultants with whom they wish to partner. Application exhibits must demonstrate the financial feasibility of the projects, commitments for services and other funding sources, site control, compliance with land use requirements, and detailed construction plans. MaineHousing will not use funding to directly create housing or provide services.

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:

Not Applicable

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type 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	\$ 750,000		
Acquisition and Development of Non-Congregate Shelters	\$ 2,480,000		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 9,853,031		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 250,000	1.6 %	5%
Administration and Planning	\$ 2,352,887	15 %	15%
Total HOME ARP Allocation	\$ 15,685,918		

Additional narrative, if applicable:

MaineHousing has projected costs based on the projection of three to five projects being selected for funding. The anticipated funding amount for Supportive Services, Acquisition and Development of Non-Congregate Shelters, and Administration and Planning will be the same whether three or five projects are funded. The amount funded for Development of Affordable Rental Housing and Non-Profit Capacity Building will vary depending on the number of projects developed.

If three projects are developed, the funding amount for Non-Profit Capacity Building will be \$150,000 and the funding amount for the Development of Affordable Rental Housing will be \$9,953,031.

If five projects are developed the funding amount for Non-Profit Capacity Building will be \$250,000 and the funding amount for the Development of Affordable Rental Housing will be \$9,853,031.

MaineHousing will allow applicants to apply for funding for Supportive Services in an amount not to exceed 5% of the Total Development Cost of the associated rental housing project. (Planning is based on 3 or 5 projects being funded)

MaineHousing will allow applicants to apply for funding for Non-Profit Capacity Building up to the limits identified in the Notice, limited to \$50,000 per non-profit organization expected to carry out HOME-ARP eligible activities.

The funding amount for Administration and Planning is projected at \$2,352,887, the statutory limit, any funds not expended in this category may be reallocated to the funding amounts for Supportive Services, Acquisition and Development of Non-Congregate Shelters, Development of Affordable Rental Housing and/or Non-Profit Capacity Building.

The remaining \$12,333,031 will be utilized for the Acquisition and Development of Non-Congregate Shelters and the Development of Affordable Rental Housing, with at least 80% funding the Development of Affordable Rental Housing and up to 20% funding the Acquisition and Development of Non-Congregate Shelters.

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:

In reviewing the Final Report and Recommendations from the Corporation for Supportive Housing following their 2020 Gaps and Needs Analysis; PSH and shelter bed inventory; and recommendations from the 8 stakeholder consultations, it is apparent that the most significant need in the homeless response system overall is affordable and supportive housing units. Although there has been a shortage of shelter beds during the pandemic, part of the reason for that is the bottleneck that has been created due to a lack of housing resources to transition families and individuals out of temporary shelter situations. Shelter length of stay has increased leaving less available beds to those who are newly homeless.

While the state of Maine needs additional homeless diversion, rapid rehousing and rental assistance programs, without units to house people these programs will never be fully effective. There has also been an increase in these resources in the state over the last year through ESG-CV funded diversion and rapid rehousing programs and Emergency Housing Vouchers. What has not increased significantly is the ability to fund PSH and affordable housing units targeting people experiencing/at risk of homelessness. Based on this rationale the decision was made to focus on funding housing units, allowing for some additional non-congregate shelter units, but only as a portion of a larger permanent housing project.

The rationale for including the utilization of up to 5% of the funding for capacity building for organizations taking on a HOME ARP project was based on the fact that in the past mission-driven service organizations have been hesitant to apply to the Housing Trust Fund (currently funding Maine's PSH program) due to the complexities involved in both the development and management of housing units. We may draw in new applicants if they are able to contract with a consultant or in some other way build organizational capacity to develop and manage a HOME ARP project.

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:

MaineHousing anticipates that 32 units of affordable rental housing units for qualifying populations will be produced with HOME-ARP funds.

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:

MaineHousing will prioritize projects that are able to be developed quickly and that can operate with sufficient operating and supportive service dollars to meet the needs of tenants. As noted above, it is anticipated that 32 units of affordable rental housing units will be developed. The units developed with HOME-ARP funds will meet MaineHousing's Consolidated Plan Priorities of Improving and Preserving the Quality of Housing, Expanding Affordable Housing Opportunities and Helping Maine People Attain Housing Stability.

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:

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

MaineHousing does not intend to give preference to any subpopulations.

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:

Not Applicable

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:

Not Applicable

HOME-ARP Refinancing Guidelines

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

the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***
Not Applicable
- ***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 PJ's guidelines, if applicable:***
Not Applicable