



# State of Maine HOME-ARP Allocation Plan

---

FY 2021

Prepared by  
Maine State Housing Authority  
May 2022



[mainehousing.org](http://mainehousing.org) | 207-626-4600

HOME-ARP  
Allocation Plan

---

Plan Year 2021

May 2022

Prepared by  
Maine State Housing Authority

Contents	
<b>Award Amount</b> .....	1
<b>Consultation</b> .....	1
<b>Public Participation</b> .....	15
<b>Needs Assessment and Gaps Analysis</b> .....	16
<b>Describe the size and demographic composition of qualifying populations within the PJ's boundaries:</b> .....	18
<b>HOME-ARP Activities</b> .....	25
<b>Use of HOME-ARP Funding</b> .....	26
<b>HOME-ARP Production Goals</b> .....	28
<b>Preferences</b> .....	28
<b>Referral Methods</b> .....	28
<b>Limitations in a HOME-ARP rental housing or NCS project</b> .....	29
<b>HOME-ARP Refinancing Guidelines</b> .....	29
<b>Attachments (Citizen Participation, SP424's and Certifications)</b> .....	30

## Award Amount

The Maine Non Entitlement Participating Jurisdiction will receive \$15,685,918 in HOME-American Rescue Plan (ARP) funding. These funds are to be distributed by MaineHousing in accordance with this Allocation Plan.

## Consultation

### *Consultation Process Summary:*

The required consultation organizations for the development of the HOME ARP Allocation Plan include:

- Maine Continuum of Care
- Homeless Service Providers
- Domestic Violence Service Providers
- Public Housing Authorities
- Public Agencies that Address the Needs of Qualifying Populations
- Public or Private Organizations that Address Civil Rights and Fair Housing
- Public or Private Organizations that Address the Needs of Persons with Disabilities

MaineHousing conducted a series of 8 virtual stakeholder meetings. For the Maine Continuum of Care, Homeless Service Providers (including Domestic Violence Service Providers), and Public Housing Authorities specific sessions were conducted.

The following are participants who attended one or more of the consultations who represent the final three required groups.

### *Public Agencies that Address the Needs of Qualifying Populations:*

Aaron Geyer	City of Portland Social Services
Alice Preble	Maine Department of Health and Human Services
Ginny Dill	Maine Department of Health and Human Services
Sara Wade	Maine Department of Health and Human Services
Stacy Keenan	Maine Department of Health and Human Services
Amelia Lyons	Maine Department of Education
Awa Conteh	City of Bangor Public Health and Community Services
Sharon Jordan	Wabanaki Public Health Services
Susan Gagnon	Maine Department of Corrections
Arwen Agee	Veterans Administration
Jason Carter	Veterans Administration
Susan Sampson	Veterans Administration
Wendy Thomas-Blais	Veterans Administration
David Richmond	Maine Bureau of Veterans Services

And all the Community Action Agency participants listed in the meeting titled Developers/Community Action Agencies

***Public or Private Organizations that Address Civil Rights and Fair Housing:***

Bill Higgins	Homeless Advocacy for All
Susan Randall	Homeless Advocacy for All
Kate Easter	Maine Coalition to End Domestic Violence
Frank D’Alessandro	Maine Equal Justice Partners
Ben Martineau	Homeless Voices for Justice
Cheryl Hawkins	Homeless Voices for Justice
Leana Amaez	Maine Department of Health and Human Services
Fatima Saidi	Maine Immigrant Rights
Gia Drew	Equality Maine
Rachel Talbot Ross	Maine Black Caucus

***Public or Private Organizations that Address the Needs of Persons with Disabilities:***

Brianne Brassett	Community Health and Counseling Services
Meredith Smith	Community Health and Counseling Services
Sarah Derosier	Community Health and Counseling Services
Cullen Ryan	Community Housing of Maine
David McCluskey	Community Care
Jill Grazia	Shalom House
Norm Maze	Shalom House
Rich Romero	OHI
Tracey Allen	Kennebec Behavioral Health
Nicole Frydrych	Volunteers of America Northern New England
Rich Hooks Wayman	Volunteers of America Northern New England
Tyra Parker	Volunteers of America Northern New England
Ben Strick	Spurwink

The attendance lists for all meetings are included below, followed by summaries of the recommendations from each group.

<b>Maine Continuum of Care</b>		
<b>Date</b>	<b>10/21/2021</b>	
<b>Type of Agency/Group</b>	<b>A group of service providers and representatives from state agencies.</b>	
<b># of participants</b>	<b>59</b>	
	<b>Name</b>	<b>Agency/Organization</b>
	Aaron Geyer	City of Portland
	Abigail Smallwood	City of Biddeford
	Ali Lovejoy	Preble Street
	Alice Preble	Maine DHHS

	Amelia Lyons	Maine Dept. of ED
	Awa Conteh	City of Bangor
	Betty LaBua	MSHA
	Meredith Smith	CHCS
	Bill Higgins	Homeless Advocacy for All
	Boyd Kronholm	BAHS
	Brianne Brasset	CHCS
	Bridge Semler	New Beginnings
	Chris Bicknell	New Beginnings
	Christina Dingus	MSHA
	Cullen Ryan	CHOM
	Dan Hodgkins	Preble Street
	David McCluskey	Community Care
	Donna Kelly	Waldo CAP
	Stephanie Primm	Knox County Homeless Coalition
	Emily Flinkstrom	Fairtide
	Erin Kelly	Preble Street
	Ginny Dill	Maine DHHS
	Janice Daku	RCAM
	Janice Lara H.	CC Maine
	Jill Grazia	Shalom House
	Lauren Bustard	MSHA
	Joe McNally	Milestone
	Josh D'Alessio	PCHC
	Kari Bradstreet	HJP
	Susan Randall	Homeless Advocacy for All
	Katie Spencer White	MMHS
	Kelsea Vincent	YAB
	Victoria Violent	City of Portland
	Kelly Watson	MSHA
	Marcie Dean	Next Step
	Melanie Beaulieu	FVP
	Mike Shaughnessy	MSHA
	Molly Sirios	BOL
	Noel Thibodeau	NHFW
	Noelle Coyne	Safe Voices
	Norm Maze	Shalom House
	Rebecca Hobbs	TTD
	Rebekah Paredes	NHFW

	Rich Romero	OHI
	Rota Knott	Tedford Housing
	Sara Wade	Maine DHHS
	Lisa McLaughlin	HSA
	Scott Tibbitts	MSHA
	Sharon Jordan	Wabanaki Public Health Services
	Susan Gagnon	Maine DOC
	Tracy Allen	KBH
	Tara Hembree	MSHA
	Melissa Mcentee	RGH
	Tyra Parker	VOANNE
	Vickey Rand	CHOM
	Whitney Files	Knox County Homeless Coalition
	Kelly Walsh	TTD
	Kate Easter	MCEDV
	Paula Weber	MSHA
	Sarah Derosier	CHCS

Maine Shelter Network		
<b>Date</b>	<b>10/19/2021</b>	
<b>Type of Agency/Group</b>	<b>The Network is currently composed of 20 or so active participating agencies. Participants are Executive Directors of single adult shelters, family shelters, shelters for domestic violence families, substance abuse shelters and youth shelters.</b>	
<b># of participants</b>	<b>20</b>	
	<b>Name</b>	<b>Agency/Organization</b>
	Lauren Bustard	MaineHousing
	Boyd Kronholm	BAHS
	Jessica Wilson	City of Lewiston
	Jenifer Needham	New Beginnings
	Kari Bradstreet	Hope and Justice Project
	Jenny Stasio	Through These Doors
	Noelle Coyne	Safe Voices
	Terence Miller	Preble Street
	Katie Spencer White	MMHS
	Josh D'Alessio	PCHC
	Victoria Violent	City of Portland

	Mark Swan	Preble Street
	Chris Bicknell	New Beginnings
	Janice Daku	RCAM
	Stephanie Primm	KCHC
	Betty LaBua	MaineHousing
	Joe McNally	Milestone Recovery
	Tracy Hair	HOME,INC
	Kristin Styles	Cumberland County
	Steve McDermott	MaineHousing

Public Housing Authorities		
<b>Date</b>	<b>11/5/2021</b>	
<b>Type of Agency/Group</b>	<b>Public Housing Authorities from across the State of Maine representing both urban and rural areas.</b>	
<b># of participants</b>	<b>20</b>	
	<b>Name</b>	<b>Agency/Organization</b>
	Mike Myatt	Bangor Housing
	Betty LaBua	MSHA
	Denise Lord	MSHA
	Lauren Bustard	MSHA
	Cheryl Sessions	Portland Housing
	Amanda Olsen	Augusta Housing
	Deb. Keller	Bath Housing
	Chris Kilmurry	Lewiston Housing
	Jen Trombley	Presque Isle Housing
	Chris LaRoche	Westbrook Housing
	Duane Bartlet	Ellsworth Housing
	Laurie Miller	Old Town Housing
	Lisa Plourde	Caribou Housing
	Kristen Styles	Cumberland County
	Victoria Violent	City of Portland
	Stacey Michaud	Fort Fairfield Housing
	Mary Davis	City of Portland
	Mike Hulsey	South Portland Housing
	Marty Szydlowski	Auburn Housing



<b>HVAC</b>		
<b>Date</b>	<b>11/2/2021</b>	
<b>Type of Agency/Group</b>	<b>Homeless Veterans Action Committee is the Veterans Committee of the Maine Continuum of Care (MCOC)</b>	
<b># of participants</b>	<b>20</b>	
	<b>Name</b>	<b>Agency/Organization</b>
	Nicole Frydrych	VOANNE
	Arwen Agee	VA
	Amy Holland	Veterans Inc.
	April Reed	MSHA
	Jason Carter	VA
	Dennis Michaud	Veterans Inc.
	Ellie Espling	Senator Collin's Office
	Heidi McCarthy	City of Lewiston
	Dan Hodgkins	Preble Street
	Kristin Styles	Cumberland County
	Lauren Bustard	MSHA
	Mary Wade	MSHA
	Ray Michaud	Veterans Inc.
	David Richmond	Maine Bureau of Veteran's Services
	Kim Rohn	Representative Golden's Office
	Wendy Thomas-Blais	VA
	Tom Pangborn	Veterans Inc.
	Brian Bouthot	VOANNE
	Betty Labua	MSHA
	Bill Higgins	Homeless Advocacy for All
	Susan Sampson	VA
	Mary Davis	City of Portland

<b>Advocates and People with Lived Experience</b>		
<b>Date</b>	<b>10/22/2021</b>	
<b>Type of Agency/Group</b>	<b>Group of people with lived experience of homelessness and their advocates.</b>	
<b># of participants</b>	<b>13</b>	
	<b>Name</b>	<b>Agency/Organization</b>
	Lauren Bustard	MSHA
	Frank D'Alessandro	MEJP
	Cheryl Hawkins	HVJ

	Bill Higgins	Homeless Advocacy for All
	Ben Martineau	HVJ
	Victoria Violent	City of Portland
	Heidi McCarthy	City of Lewiston
	Denise Lord	MSHA
	Betty LaBua	MSHA
	Anna Brewer	Preble Street
	Susan Randall	Homeless Advocacy for All
	Jessica Wilson	City of Lewiston
	Steve McDermott	MSHA

<b>BIPOC</b>		
<b>Date</b>	<b>10/19/2021</b>	
<b>Type of Agency/Group</b>	<b>Members of BIPOC Community and Agencies working with the BIPOC population</b>	
<b># of participants</b>	<b>53</b>	
	<b>Name</b>	<b>Agency/Organization</b>
	Carla Hunt	DHHS
	Abdulkerim Said	NMPHI
	Abbie Yamamoto	MANA
	Abdikhadar Shire	AK Health
	Abdikadir Negeye	MEIRS
	Sally Albert	Community Concepts
	Leana Amaez	DHHA
	Christine Fecko	TOA
	Claude Rwaganje	ProsperityME
	Cory Carter	MECAP
	Crissia Lindsey	MMCAP
	Cynthia Simpson	Mano en Mano
	Lauren Bustard	MSHA
	Donna Kelley	Waldo CAP
	Fatima Saidi	Maine Immigrant Rights
	Caroline Fernandes	DHHS
	Fiona	MECAP
	Gabriel Turner	Down East Community Partners
	Gia Drew	Equality Maine
	Hamda	NMPHI – New Mainers Public Health Initiative
	Heidi LeBlanc	Penquis
	Mary Hermon	DOE
	Chanbopha Himm	DHHS

	Hodan Aji-Ali	Gateway Community Services
	Jamie Chandler	ACAP
	Janelle Wuoristo	PCAP
	J. Castillo	Mano en Mano
	Jeffery Smith	IRC
	Jill Longstaff	KVCAP
	Juana Rodriguez	Mano en Mano
	Kate Fahey	Gateway Community Services
	Stacy Keenan	OFI
	Lawrence R.	MECAP
	Lori Whittemore	SCS
	Maureen Leary	MECAP
	Melinda Thomas	MEAOO
	Melissa Dowe	KVCAP
	Melissa Dupree	TOA
	Michael Hallundbaek	Mid Coast Connector
	Michael Willis	KVCAP
	Mohamed Abdillahi	MCFFA
	Patricia Kelleher	Waldo CAP
	Philip Stocking	KVCAP
	Rachel Talbot Ross	Maine Black Caucus
	Sarah Lewis	MAIN
	Sherry Locke	ACAP
	Susan Richards	MECAP
	Tara Harvey	KVCAP
	Tarlan Ahmadov	Azerbaijan Society of Maine
	Theresa Dow	ACAP
	Betty LaBua	MSHA
	Tabitha Tschamler	OFI
	Ian Yaffe	OPE – Office of Population Health Equity
	Z Holman	SMAAA – Southern Maine Agency on Aging

<b>Developers/Community Action Agencies</b>		
<b>Date</b>	<b>10/27/2021</b>	
<b>Type of Agency/Group</b>	<b>Mixed group of people representing developers, providers and Community Action Agencies</b>	
<b># of participants</b>	<b>24</b>	
	<b>Name</b>	<b>Agency/Organization/Company</b>
	Heidi Leblanc	Penquis
	Denise Lord	MSHA
	Josh D'Alessio	PCHC
	Ben Strick	Spurwink
	Theresa Dow-Oleary	ACAP
	Jason Parent	ACAP
	Shawn Yardley	Community Concepts
	Steve McDermott	MSHA
	Barbara Crider	YCCAC
	Donna Kelley	Waldo Cap
	Claire Berkowitz	MMCA Corp.
	Lauren Bustard	MSHA
	Paula Webber	MSHA
	Mark Wiesendanger	MSHA
	Mary Davis	City of Portland
	Lincoln Jeffers	City Of Lewiston
	Zak Maher	City of Auburn
	Rick Hooks Wayman	VOANNE
	Boyd Kronholm	BAHS
	Nate Libby	Community Concepts
	Deb Johnson	DECD
	Sayre Savage	Four Directions Development
	Megan Parks	Community Concepts
	Bobbi Harris	Down East Community Partners
	Jason Bird	Penquis
	Betty LaBua	MSHA

<b>Youth Action Board</b>		
<b>Date</b>	<b>11/1/2021</b>	
<b>Type of Agency/Group</b>	<b>Youth participating on the Youth Action Board of the Youth Homelessness Demonstration Program</b>	
<b># of participants</b>	<b>2</b>	
	<b>Name</b>	<b>Agency/Organization</b>
	Kelsea Vincent	YAB
	Beverly Hubbard	YAB

The following table is a summary of the organizations consulted and feedback received.

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	<p>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.</p> <p>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.</p>
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	<p>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	A collaboration of several agencies and organizations to ensure that Veteran homelessness is rare, brief and non-recurring.	Virtual meeting with 20 people attending.	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.
Advocates and People with Lived Experience	Group of people with lived experience	A virtual meeting with 13 people attending.	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 someday buy.
BIPOC	Members of BIPOC Community and Agencies working with the BIPOC Population	Virtual meeting with 53 people attending.	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 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 developers, providers and Community Action Agencies	Virtual meeting with 24 people attending	Need more affordable units, develop additional LIHTC units. Build shelters with more capacity, provide 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 rural 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.
Statewide Youth Advisory Board	YAB	Virtual Meeting attended by two members of the YAB.	Provide housing units at affordable rates. Include funding for move in expenses like furniture. Ensure people participating in programs get the resources they need.

## Public Participation

### *Public participation process summary:*

*Public Comment Period Start Date (Date of public notice): 1/4/2022*

*Public Comment Period End Date: 02/03/2022*

*Public Hearing Date: 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. The January 19, 2022 public hearing was attended by nine people. The information provided at the public hearing included the amount of HOME-ARP funding the State of Maine will receive and the intended use of the funds. MaineHousing received two written comments during the public comment period.

### *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?

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

See attached comments and responses.

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

N/A

Needs Assessment and Gaps Analysis

⊕ **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	88				
Unsheltered Homeless						1 HH 5 pp	136	10	4				
<b>Current Gap</b>										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**

<b>Non-Homeless</b>			
	<b>Current Inventory</b>	<b>Level of Need</b>	<b>Gap Analysis</b>
	<b># of Units</b>	<b># of Households</b>	<b># of Households</b>
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	
<b><i>Current Gaps</i></b>			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:

*Homeless as defined in 24 CFR 91.5*

The 2020 Point in Time Count identified 2097 individuals as meeting HUD’s definition of homelessness. The following chart provides the demographic characteristics of those individuals.

<b>Characteristics of Homeless Population in Maine</b>	
<b>RACE</b>	
White	78%
Black or African American	15%
Asian	0.1%
American Indian/Alaskan Native	2%
Pacific Islander	0.3%
Multiple Races	5%
Hispanic or Latino	4%
<b>AGE</b>	
<18 years	23%
18-24 years	7%
25 and over	70%
<b>GENDER</b>	
Male	54%
Female	45%
Transgender	0.3%
Gender Non-Conforming	0.3%

*Source: Maine 2020 PIT Count*

Within the homeless population of Maine, people of color are significantly over-represented. In a state where people of all races other than white make up only 5.7% of the overall population, people of color represent approximately 22% of the homeless population. This is especially true in the case of black individuals who account for about 15% of individuals experiencing homelessness. There has been a fairly significant increase in the percentage of black individuals within the homeless system during the past few years, partially due to an influx of African Asylum Seeking families who have been served through the homeless response system.

*At Risk of Homelessness as defined in 24 CFR 91.5*

Those most at risk of homelessness in Maine are renter households within 30% of Area Median Income with at least one severe housing problem such as overcrowding, rent burden greater than

Renter Households - Race/Ethnicity	<b><u>At-risk of Homelessness:</u> 0%-30% AMI Renter HH w/ 1 or more severe housing problems</b>		<b>Maine</b>	
	#	%	#	%
<b>Total Renter Households</b>	<b>23,090</b>	<b>-</b>	<b>154,612</b>	<b>-</b>
White alone, non-Hispanic	20,050	86.8%	140,293	90.7%
Black or African American alone, non-Hispanic	900	3.9%	3,937	2.5%
Asian alone, non-Hispanic	210	0.9%	2,151	1.4%
American Indian or Alaska Native alone, non-Hispanic	305	1.3%	1,733	1.1%
Pacific Islander alone, non-Hispanic	-	0.0%	14	0.0%
Hispanic, any race	700	3.0%	2,939	1.9%

30% of income or inadequate plumbing and/or kitchen facilities. There are an estimated 23,090 renter households within this income range. The following charts include the racial and disability status of this group of renters.

Renter Households – Limitations & Impairments	<b><u>At-risk of Homelessness:</u> 0%-30% AMI Renter HH w/ 1 or more severe housing problems</b>		<b>Maine</b>	
	#	%	#	%
<b>Total Renter Households</b>	<b>23,090</b>	<b>-</b>	<b>154,612</b>	<b>-</b>
Household member has a hearing or vision impairment	4,805	20.8%	20,485	13.2%
Household member has an ambulatory limitation	7,135	30.9%	29,775	19.3%
Household member has a cognitive limitation	7,985	34.6%	29,775	18.0%
Household member has a self-care or independent living limitation	6,655	28.8%	27,805	16.7%

**Source:** 1. *Comprehensive Housing Affordability Strategy (CHAS)* 2. 2020: ACS 5-Year Estimates – S2502

Poverty, housing instability and cost burden are characteristics of Maine’s low income families most at risk of becoming homeless. The Maine Continuum of Care has identified the following factors associated with housing instability and increased risk of homelessness: insufficient rental assistance options, eviction, family conflict, unemployment, and behavioral health challenges, including substance use disorder, and lack of affordable units. Among single individuals, mental and physical disabilities combined with chronic health conditions and addictions are a much larger factor in a

person’s risk for becoming homeless. As indicated in the chart the incidence of disabilities in the at-risk population is significantly higher than the overall Maine population, in some cases almost two times the rate of occurrence in the general population. Minority households are also over-represented in this group.

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

In FY2021 the Maine Coalition to End Domestic Violence member organizations served a total of 11,375 individuals. The following chart provides demographic information for this group.

<b>Characteristics of Clients with DV Victimization Total FY2021 – 11,375</b>	
<b>RACE</b>	
White	43%
Black or African American	2%
Asian	0.4%
American Indian/Alaskan Native	0.6%
Pacific Islander	0.09%
Unknown/Other	53%
Hispanic or Latino	0.8%
<b>AGE</b>	
<18 years	5%
18-24 years	8%
25 and over	70%
Unknown	17%
<b>GENDER</b>	
Male	8%
Female	89%
Transgender	0.3%
Gender Non-Conforming	0.2%
Not Specified	2.5%

**Source:** *MCEDV 2022*

Because information on race is not uniformly collected by providers it is difficult to draw any conclusions from the data presented. As is typical among survivors of domestic violence, the overwhelming majority were female, although 905 men, 33 transgender individuals and 18 non-binary individuals were also served. 963 individuals, including 412 children, were served in residential programs, both emergency shelter and transitional housing.

***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***

There are two populations in Maine that would be most likely to fall into the Other Populations category:

- Other Families Requiring Services or Housing Assistance to Prevent Homelessness
- At Greatest Risk of Housing Instability

The following charts provide demographic information for this group.

Renter Households - Race/Ethnicity	<b>Other Populations: 30%-50% AMI Renter HH w/1 or more severe housing problems</b>		Maine	
	#	%	#	%
<b>Total Renter Households</b>	<b>9,625</b>	<b>-</b>	<b>154,612</b>	<b>-</b>
White alone, non-Hispanic	8,665	90.0%	140,293	90.7%
Black or African American alone, non-Hispanic	225	2.3%	3,937	2.5%
Asian alone, non-Hispanic	35	0.4%	2,151	1.4%
American Indian or Alaska Native alone, non-Hispanic	95	1.0%	1,733	1.1%
Pacific Islander alone, non-Hispanic	-	0.0%	14	0.0%
Hispanic, any race	150	1.6%	2,939	1.9%

Renter Households – Limitations & Impairments	<b>Other Populations: 30%-50% AMI Renter HH w/1 or more severe housing problems</b>		Maine	
	#	%	#	%
<b>Total Renter Households</b>	<b>9,625</b>	<b>-</b>	<b>154,612</b>	<b>-</b>
Household member has a hearing or vision impairment	3,395	35.3%	20,485	13.2%
Household member has an ambulatory limitation	8,170	84.9%	29,775	19.3%
Household member has a cognitive limitation	5,040	52.4%	29,775	18.0%
Household member has a self-care or independent living limitation	4,755	49.4%	27,805	16.7%

**Source:** 1. Comprehensive Housing Affordability Strategy (CHAS)  
2. 2020: ACS 5-Year Estimates – S2502

In this group, people of color are not as clearly over-represented as they are in the Homeless and At-Risk of Homelessness populations. However, disabilities are significantly higher among this group, possibly because this income level represents those who receive some sort of Social Security disability assistance. Additional demographic information in response below.



*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):*

**1. Other Families Requiring Services or Housing Assistance to Prevent Homelessness**

There is a new population of families and individuals who met the definition for homelessness and were then placed in hotels through the U.S. Treasury Emergency Rental Assistance program or Maine State General Assistance Funding. These are time-limited supports and if families are not housed before they expire they will return to homelessness. Although we do not have demographic information on these households because they were not entered into the HMIS database, the 2022 Point In Time Count identified 2,474 individuals being housed in hotels across the state who would otherwise be homeless. Within this population approximately 350 families comprised of over 1,200 individuals are Angolan and Congolese households seeking asylum in the U.S. Because they do not have Refugee status they are ineligible for most federal rental assistance programs – with the exception of the Emergency Rental Assistance program.

**2. At Greatest Risk of Housing Instability**

The other population which could most likely remain housed were they provided with supportive services would be those households falling within the 30 – 50% range of Area Median Income. There are an estimated 9,625 renter households that fall within this income range. The statewide centralized waitlist for the Housing Choice Voucher program is comprised of many of these households.

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

***Homeless as defined in 24 CFR 91.5***

Across the state of Maine there are insufficient shelter beds for all those individuals and families experiencing homelessness. Some of the more rural counties such as Piscataquis, Franklin, Lincoln and Waldo have no shelter facilities and individuals have to travel to the nearest service center that has a shelter. For those in shelter the most significant unmet need 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 standard. 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. 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.

***At Risk of Homelessness as defined in 24 CFR 91.5***

Housing costs are rising and there is a gap of more than 16,000 affordable units for households at or below 30% AMI. Housing cost burden is the most commonly cited housing problem followed by housing quality issues – specifically substandard plumbing and kitchen facilities. These housing

quality issues are most often associated with the age of the housing stock in the state. Although rental assistance is also a significant need of this population, many would be unable to utilize a voucher in their current housing due to housing quality or overcrowding, and would therefore be forced to find a unit that would meet the voucher program requirements. Households issued a voucher from the waiting list are often unable to locate a new unit and unable to lease in place. This can lead to voucher expiration and loss of the assistance for the household.

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

There is a need for shelter and safe transitional housing for this population in Maine, especially for male victims. Affordable rental units are needed for households to move on from shelter and transitional housing. Thirteen organizations in the state provide some level of support services for victims of domestic and sexual violence, primarily under the category of emergency services. There is a need for increased case management capacity as well as culturally and linguistically competent services for the increasing asylum seeker and refugee population in Maine.

***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***

In order to secure stable permanent housing, many of these households require access to financial assistance - whether it be a rental voucher, subsidized rental, or affordable mortgage. Others may require short-term assistance due to an unexpected expense to get back on their feet. Housing stability and behavioral health services may be required to keep individuals facing behavioral health challenges stably housed. A 2017 study by Mental Health America estimated that more than 50% of individuals with mental health and substance use disorders were not engaged in needed services due to barriers such as lack of education around the symptoms and risk factors, lack of insurance, workforce shortages and transportation issues in rural areas. Linguistic and cultural supports, as well as workforce development services, may be needed for those seeking asylum in the U.S. As was indicated in the demographic information, individuals with disabilities are highly over-represented in this group. Accessible units, in-home healthcare supports and transportation to access healthcare are insufficient in the state and necessary to assist individuals with disabilities in remaining safely housed.

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

- **Congregate and non-congregate shelter units** – There are currently 1,255 year round shelter beds across the state. Shelters are fairly well distributed with the exception of 4 rural counties. Shelters participating in the ESG-funded Emergency Shelter and Housing Assistance Program (ESHAP) have access to a set aside of RRH and HCV rental assistance to offer to their guests. The ESHAP program also funds Housing Navigator positions in these shelters to assist guests in obtaining and retaining permanent housing.
- **Supportive services** – Many homeless service providers are active throughout the state. These providers have no lack of HOME-ARP qualifying clients requiring services. Funding and staffing shortfalls continue to be the limiting factor to providing the needed supportive services.
- **Affordable rental housing** – There are under 30,000 affordable units in the state of which 11,000 have income-based rents and the remaining are rent restricted units. Maine’s Public Housing Authorities administer over 12,500 Housing Choice Vouchers, 3,500 of which are administered statewide by MaineHousing.
- **Homelessness Diversion services** – Approximately 16 service providers, including City of Portland Homeless Services, offer diversion services, which include staff trained in Rapid Resolution problem-solving conversations as well as some flexible funding to assist individuals and families in retaining or obtaining stable housing without having to enter the shelter system.
- **Rapid Rehousing services** – In parts of the state with the most individuals placed in temporary shelter such as hotels due to the pandemic there are RRH services available to assist these households in obtaining permanent housing.
- **Emergency Rental Assistance** – This federal program has kept many households that were at risk of eviction and homelessness in their homes. It has also been utilized to place those already experiencing homelessness in hotels until permanent housing can be located. To date approximately 23,000 households have received this assistance.
- **Victims of Domestic Violence** – In Maine there are 169 emergency shelter beds, 7 PSH, and 136 transitional. These resources are distributed across the state.

***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.

***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:***

Please see discussion of “At Greatest Risk of Housing Instability” above.

***Identify priority needs for qualified 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 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(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:***

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.

*Describe whether the PJ will administer eligible activities directly:*

MaineHousing will not use funding to directly create housing or provide services.

*If any portion of the PJs 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 programs:*

Not Applicable

### Use of HOME-ARP Funding

#### ☒ 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%
<b>Total HOME ARP Allocation</b>	<b>\$ 15,685,918</b>		

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 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 at least 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 at least 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:***

MaineHousing does not intend to give preference to any qualifying populations.

***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

## 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):***

A waitlist will be established for each HOME-ARP project.

*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):*

MaineHousing does not intend to use the coordinated entry process for referrals.

*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):*

Not Applicable

*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):*

Not Applicable

#### 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:*

MaineHousing will not limit eligibility to a particular qualifying population.

*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:*

Not Applicable

*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):*

Not Applicable

#### HOME-ARP Refinancing Guidelines

MaineHousing does not intend to allow refinancing existing debt with HOME-ARP funds.



**Attachments (Citizen Participation, SP424's and Certifications)**

## **HOME-ARP Allocation Plan**

### **Public Comments and MaineHousing Responses**

MaineHousing thanks the personnel from Aroostook County Action Program for their participation in the public hearing process and appreciates their support of the plan.

MaineHousing thanks Cullen Ryan for taking the time to draft his comments and appreciates his support of the plan.

MaineHousing thanks Rich Hooks Wayman for taking the time to draft his comments and appreciates his support of the plan.

MaineHousing agrees with the comment from Rich Hooks Wayman that the term 'non-congregate shelter' should be defined and will ensure that the term 'non-congregate shelter' is defined more clearly in the RFP for the HOME ARP Program.

MaineHousing agrees with Rich Hooks Wayman that the goal of 32 new units is a minimum. In response to this comment the HOME-APR Allocation Plan has been updated to read "create at least 32 new units".

MaineHousing has had, and will continue to have, frequent conversations with the groups mentioned by Rick Hooks Wayman, as well as, myriad other developer, construction industry, management, service provider, State, Federal and Local Government, financial, and advocate partners regarding this funding source.



#### Board Members

Aaron Shapiro  
Retired Community Development  
Director  
Cumberland County  
Board President

Chip Newell  
Principal  
The NewHeight Group  
Board Treasurer

Gunnar Hubbard  
Principal  
Thornton Tomasetti  
Board Secretary

David Birkhahn  
Vice President  
TD Bank

Elizabeth Boeppel  
Partner  
Murray, Plumb, & Murray

Kalie Hess, Associate Director  
The Partnership for Children's Oral  
Health

Jan McCormick  
Retired Affordable Housing  
Investment Executive

Luc Nya  
Mental Health Program Coordinator  
OCFS/Corrections Liaison  
Maine DHHS

Thomas Placek  
Veteran's Healthcare Outreach  
Community Organizer  
Preble Street

Jennifer Putnam  
Executive Director  
Waban

Jennifer Rottmann  
Deputy Director/CFO  
The Genesis Fund

John Ryan  
President  
Wright-Ryan Construction

Bill Shanahan  
Co-President  
Evermoth

Kimberly Twitchell  
Maine Regional President  
NBT Bank

#### Staff Contacts

Cullen Ryan  
Executive Director

Kyra Walker  
Chief Operating Officer

Elizabeth Baranick  
Asset Manager

Sarah Gaba  
Occupancy Manager

Mara O'Shea  
Compliance Manager

Jim Gwilym  
Chief Financial Officer

Chris Harmon  
Controller

Vickey Rand  
Advocacy & Communications Manager

Brenda Sylvester  
Development Officer

Bree LaCasse  
Development Officer

Brian Kilgallen  
Development Officer

Robyn Wardell  
Development Associate

January 7, 2022

## Public Comments Regarding the Maine HOME-ARP Allocation Plan

My name is Cullen Ryan, and I am the Executive Director of Community Housing of Maine or CHOM, the largest housing provider for homeless populations in Maine. Our staff of 12 works collaboratively with more than 50 different service provider organizations to effectively and efficiently house about 1100 of Maine's most vulnerable people. I am also a member of the Statewide Homeless Council, and I serve as President of the Maine Continuum of Care Board of Directors. I also chair the ESAC Long Term Stayers Committee which with 18 participating organizations has housed more than 367 of the longest stayers in homelessness in Maine over the last 6 ½ years, and also demonstrated that this population is as many as 45 times more likely to be in jail and 19 times more likely to be in the hospital when unhoused vs housed. Housing this population saves us a lot of money and is a game changer for each person.

I write to respectfully offer comments on the Maine HOME-ARP Allocation Plan.

This plan is very well thought out, and I commend MaineHousing for carefully crafting an allocation plan that aligns with Maine's Plan to End and Prevent Homelessness and that works to fill the gaps identified in Maine's homeless service system. I am particularly pleased to see a large investment in much needed affordable and permanent supportive housing (PSH).

Homelessness is a symptom. For most, it is a symptom of the serious lack of affordable housing. There is a disconnect between what people have for income and what it costs to have housing. Maine's demand for affordable and permanent supportive housing far exceeds its supply.

But a small percentage of the homeless population is prone to chronic homelessness and requires the more serious intervention of permanent supportive housing. Without access to deeply targeted housing, people with complex needs end up mired in homelessness, some for decades, wandering our streets, all but living in our shelters, or sleeping outside, and ricocheting through all of our most expensive emergency systems.

Various legislatively created initiatives are underway or have completed recent work aiming to fix the system, such as the Frequent Users Systems Collaborative (FUSE), the Mental Health Working Group, and the Medicaid Innovation Accelerator Program (IAP). The results from these endeavors are designed to take pressure off of our emergency systems – homeless shelters, jails, prisons, police, rescue, emergency rooms – and even our downtown storefronts where people are sleeping in doorways. However, access to affordable and permanent supportive housing is critical to the success of these initiatives. The injection of PSH funding included in this allocation plan is a game-changer for ending and preventing homelessness in Maine – specifically long-term homelessness.

I also applaud MaineHousing for including funding for non-congregate shelter in conjunction with PSH, particularly for people unsheltered. Using hotels/motels as non-congregate shelter for people experiencing unsheltered homelessness with complex needs throughout the pandemic has proven to be a wise, effective strategy. Engaging people on the street or in transient encampments while they're experiencing unsheltered homelessness is very difficult as they are trying to meet their basic survival needs and lack the stability that shelter from the elements provides. However, when this population is sheltered using hotels/motels, they can be more effectively and efficiently outreached, their engagement increases, and they begin to make their way toward attaining housing.

The HOME-ARP Allocation Plan sets the stage for much needed, best practice housing resources enhancing Maine's ability to end long-term and chronic homelessness. Thank you for such a thoughtful and well-designed approach to resource allocation.

Thank you for the opportunity to comment.

## Paula Weber

---

**From:** Lauren Bustard  
**Sent:** Wednesday, February 2, 2022 4:35 PM  
**To:** Paula Weber  
**Subject:** FW: Written Comment - Maine HOME-ARP Allocation Plan

Here's another comment for HOME ARP.

---

**From:** Hooks Wayman, Richard <rich.hookswayman@voanne.org>  
**Sent:** Wednesday, February 2, 2022 4:34 PM  
**To:** Lauren Bustard <lbustard@mainehousing.org>  
**Cc:** Baldwin, Terry <terry.baldwin@voanne.org>; Drake, Travis <travis.drake@voanne.org>; Sites, Brian <brian.sites@voanne.org>  
**Subject:** [SUSPECT URL]Written Comment - Maine HOME-ARP Allocation Plan

### EXTERNAL EMAIL

#### WRITTEN COMMENT TO MAINE HOUSING

Dear Ms. Bustard and the Directors of MaineHousing:

Thank you for publishing the State of Maine HOME-ARP Allocation Plan for FY 2021. I offer this written comment in response to the published Maine HOME-ARP Allocation plan. [https://mainehousing.org/docs/default-source/policy-research/federal-funds/home-arp-allocation-plan-draft-for-public-comment.pdf?sfvrsn=32f28715\\_4](https://mainehousing.org/docs/default-source/policy-research/federal-funds/home-arp-allocation-plan-draft-for-public-comment.pdf?sfvrsn=32f28715_4)

I would first like to say that I am grateful for MaineHousing's diligent work in gathering public comment on this plan. The various and numerous stakeholder meetings held by MaineHousing evince their commitment to transparency and partnership with persons impacted by homelessness and a diverse array of community-based organizations serving persons who are experiencing homelessness. I would also like to say that I believe MaineHousing has struck the right balance in suggesting that the following proposed amounts between diverse activities:

- \$750,000 for Supportive Services
- \$2.48M for the acquisition of non-congregate emergency shelter
- \$9.85M for the development of affordable rental housing
- \$250,000 for nonprofit capacity building
- \$2.35M for administration and planning

I am particularly pleased for the emphasis on the development and creation of new supportive housing units in Maine, which has nationally been shown to be an evidence-based practice to end homelessness for long-term or chronic homeless populations. The proposed requirement that developers identify in their response to any RFP "how the funding will be used to create affordable housing and provide services" is appropriate and necessary.

I would like to offer two minor recommendations for possible modifications for your RFP:

1. The RFP should define the term 'non-congregate shelter' and consider both geographical context (how does the structure change between rural and urban centers?) and populations (does non-congregate shelter look different for youth, single adults, and families with children?).
- 2.

3. The RFP should be clear that the goal identified on page 14 - to create 32 new units of affordable rental housing - is a baseline goal and that additional or supplemental funding that can be secured by developers to create more units will be incentivized.

I would like to suggest that the approximate \$9.85M in HOME-ARP funding allows developers to leverage this with additional, supplement funding to expand the number of units to be constructed or acquired and rehabilitated. If MaineHousing would prioritize the pairing of these federal funds for new affordable rental housing units with project-based rental assistance vouchers, this long-term funding commitment would enable developers to secure private lending that could stretch the funding to create more units of housing. Perhaps local municipalities could donate land or buildings, or the HOME-ARP funds could be coupled with ARP funds to local counties, MaineHousing Part E funding, Community Solutions Grants, or the federal Affordable Housing Trust Fund that would create more than 32 units.

I would encourage MaineHousing to meet with the Maine Affordable Housing Coalition, Genesis Fund, other lenders, and the Governor's Office of Policy Innovation and the Future before final publication of the RFP to see if there are creative ways to leverage these funds with supplemental financing to create more than 32 units of supportive housing.

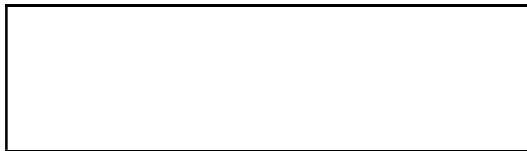
Thank you again for all your work in revieing community needs and publishing a well-balanced HOME ARP Allocation Plan.

Sincerely,

Rich Hooks Wayman

***HAPPY BLACK HISTORY MONTH!***

<https://thekingcenter.org/the-king-center-adds-new-meaning-to-love-this-valentines-day/>



**RICHARD A. HOOKS WAYMAN (Pronouns he, him, his)**

President & CEO

Volunteers of America Northern New England

[rich.hookswayman@voanne.org](mailto:rich.hookswayman@voanne.org)

T 207.373.1140 // C 207.400.6070

[www.voanne.org](http://www.voanne.org)

*Great Place to Work-Certified™*





## Helping America's most vulnerable.®

This transmission contains information that may be confidential. It has been prepared for the sole and exclusive use of the intended recipient and on the basis agreed with that person. If you are not the intended recipient of the message (or authorized to receive it for the intended recipient), you should notify us immediately; you should delete it from your system and may not disclose its contents to anyone else.

## HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

**Anti-Lobbying** --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

**Section 3** --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

**HOME-ARP Certification** --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



\_\_\_\_\_  
Signature of Authorized Official

February 10, 2022

\_\_\_\_\_  
Date

\_\_\_\_\_  
Director

\_\_\_\_\_  
Title



**Application for Federal Assistance SF-424**

\* 1. Type of Submission:

- Preapplication
- Application
- Changed/Corrected Application

\* 2. Type of Application:

- New
- Continuation
- Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

\* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

M21-SP230100

**State Use Only:**

6. Date Received by State:

7. State Application Identifier:

**8. APPLICANT INFORMATION:**

\* a. Legal Name:

Maine State Housing Authority

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

010312916

\* c. UEI:

NJEKQK2U8ZJ5

**d. Address:**

\* Street1:

26 Edison Drive

Street2:

\* City:

Augusta

County/Parish:

\* State:

ME: Maine

Province:

\* Country:

USA: UNITED STATES

\* Zip / Postal Code:

04330-4633

**e. Organizational Unit:**

Department Name:

Maine State Housing Authority

Division Name:

**f. Name and contact information of person to be contacted on matters involving this application:**

Prefix:

Mr.

\* First Name:

Peter

Middle Name:

\* Last Name:

Merrill

Suffix:

Title:

Deputy Director

Organizational Affiliation:

\* Telephone Number:

207-626-4600

Fax Number:

207-624-5702

\* Email:

pmerrill@mainehousing.org

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

A: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

**\* 10. Name of Federal Agency:**

US Department of Housing and Urban Development

**11. Catalog of Federal Domestic Assistance Number:**

14.239

CFDA Title:

HOME Investment Partnerships Program

**\* 12. Funding Opportunity Number:**

\* Title:

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

HOME-ARP

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

\* b. End Date:

**18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="15,685,918.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text"/>
* g. TOTAL	<input type="text" value="15,685,918.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes  No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

\*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative: 

\* Date Signed:

## ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director
APPLICANT ORGANIZATION Maine State Housing Authority	DATE SUBMITTED 02/10/2022

## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2022

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.


**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Director
APPLICANT ORGANIZATION Maine State Housing Authority	DATE SUBMITTED 02/10/2022