

## HOME-ARP Allocation Plan Template with Guidance

**Instructions:** All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

## 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:** CNSRT-Schenectady (including City of Schenectady, City of Troy, and the Town of Colonie)

**Date:** December 16, 2022

### Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- 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.

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.

### **Template:**

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

### **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:***

In accordance with the requirements of the HOME-ARP Program, CARES of NY, Inc. on behalf of the Consortium, which consists of the City of Schenectady, City of Troy, and Town of Colonie, consulted with the community stakeholders and the public to obtain data and feedback on the needs and gaps to address homelessness and housing instability in the City of Schenectady, City of Troy, and Town of Colonie. For this process, CARES first consulted with the following Public Housing Authorities (PHAs): Schenectady Municipal Housing Authority, Troy Housing Authority and Town of Colonie's Central Office (local Housing Choice Voucher Administrator) via a virtual meeting to obtain their qualitative and quantitative data to inform the needs assessment and gap analysis. Next, an information session was held with the Consortium's affordable housing developers which was followed by an online survey to this same constituency. A second online survey was issued to community stakeholders that captured their funding recommendations. Two stakeholders' forums were held on August 3<sup>rd</sup> and 4<sup>th</sup>, 2022, following the stakeholder survey. This forum allowed for stakeholder education on the HOME-ARP program and in-depth discussions on community needs to address homelessness and housing instability. In September 2022 additional outreach to stakeholders was performed to get further understanding on the community needs. The same stakeholder survey was available online to the public which outlined the amount of money awarded to the Consortium, explained eligible activities and requested funding recommendations. The survey also provided data on the qualifying subpopulations most in need of housing to help inform decision making.

### **Consultation with the Consortium's Public Housing Authorities**

CARES of NY, Inc. on behalf of the Consortium met with the Schenectady Municipal Housing Authority, Troy Housing Authority and the Town of Colonie's Central Office on May 31<sup>st</sup>, 2022 to review the allocation of funds for eligible activities, qualifying populations, and preferences for targeted assistance within the HOME-ARP program. The consulted PHAs and Central Office provided CARES with aggregate data on the Housing Choice Voucher

Program (Section 8) and PHA waitlists to include in the Needs Assessment and Gap Analysis portion of the Allocation Plan.

#### Consultation with Developers

CARES of NY, Inc. on behalf of the Consortium invited thirteen (13) and met with nine (9) of the Consortium's primary affordable housing developer team members on June 22<sup>nd</sup>, 2022, to participate in the consultation process. CARES staff provided an overview of the HOME-ARP program's eligible activities, qualifying populations, and funding requirements. Additionally, CARES staff facilitated a discussion to provide clarity to developers and obtain feedback on interest in applying for and the need for HOME-ARP funding to develop affordable housing in the City of Schenectady, City of Troy, and Town of Colonie. Following the developer's forum, a survey was distributed to the attendees on July 18<sup>th</sup>, 2022, with a close date for responses on August 1<sup>st</sup>, 2022 to gauge interest in the potential use of HOME-ARP funds. The forum and survey asked for feedback on (1) Are HOME-ARP funds necessary to create additional affordable housing units (compared to other local, state, and federal resources), and (2) Are HOME-ARP funds desirable to affordable housing developers with the requirements to accept clients from the CoC Coordinated Entry priority list and to make units available to all qualifying populations.

#### Consultation with Stakeholders

CARES of NY, Inc. on behalf of the Consortium invited the full CoC membership and additional stakeholders serving and/or representing various subpopulations and populations overrepresented in service provision to participate in the consultation process. A stakeholder survey was disseminated on July 6<sup>th</sup>, 2022 – with a close date of July 20<sup>th</sup>, 2022, requesting input on which eligible activities, qualifying populations, and subpopulations (if any) should be targeted with HOME-ARP resources to reduce homelessness and increase housing stability in the City of Schenectady, City of Troy, and Town of Colonie. After synthesizing feedback from the survey, two forums were held on August 3<sup>rd</sup>, 2022, at 10:00am and August 4<sup>th</sup>, 2022 at 4:00pm with agendas for in-depth discussion about the program, analyses of data on homelessness (from the Homeless Management Information System/HMIS, Coordinated Entry Program, Census, and housing authorities) and sharing results from the affordable housing and stakeholders' surveys.

Two-hundred and sixty-three (263) stakeholders, spanning 105 organizations, were invited to participate in the stakeholder survey including:

- members of the CoCs serving the jurisdictions' geographical areas, Homeless Services Planning Board (Schenectady), Rensselaer County Homeless Services Collaborative (Troy) and the Albany County Coalition on Homelessness (Town of Colonie) comprised of homeless service providers (i.e. SCAP, Bethesda House, Albany Damien Center, Joseph's House, St. Paul's Center)
- domestic violence service providers (i.e. YWCA of Northeastern NY, Unity House)
- veterans groups; (i.e. public agencies that address the needs of the qualifying populations (as listed in chart below)
- fair housing and civil rights organizations (i.e. Legal Aid Society of Northeastern NY, National Association for the Advancement of Colored People (NAACP), Schenectady County Human Rights Commission, and Citizen Action).

Sixteen (16) out of 105 organizations responded to the survey. Of the 105 organizations invited to the stakeholder forum, thirty-six individuals (36) attended. At least one agency from each of the aforementioned types of organizations participated, as described in further detail in the chart below. Many of the below agencies serve persons with a variety of disabling conditions, including physical, mental, and developmental.

The shared survey information from stakeholders was utilized as a springboard to discuss the best way to utilize these funds to address homelessness/housing instability needs.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Schenectady Municipal Housing Authority (SMHA)	Type of Agency/Org: Public Housing Authority QPs served: all	Meeting	SMHA reported its support for Affordable Housing development and eviction prevention (using TBRA funding). SMHA reported 239 units are in arrears with average arrears close to \$2k per family, and an overall arrear amount nearing half a million dollars since the NYS eviction moratorium lift in early 2022. SMHA reported some local programs (such as SCAP) provide assistance to those with arrears, but the increase in rent in the city will “create a new wave of issues”. SMHA reported its waitlist consists of 7,300 applicants, of which, 4,200 have a City of Schenectady address. SMHA noted a need for a fair housing component as Schenectady is weak in this area and it has experienced many fair housing violations as it works to renovate existing properties. Lastly, SMHA reported a need for non-congregate shelters to support those with mental illness.
Troy Housing Authority (THA)	Type of Agency/Org: Public Housing Authority QPs served: all	Meeting	THA reported recent increase in movement in the AH rental market. Apartments are opening up for rental due to the moratorium lift, but tenants cannot afford deposits (security, utility, etc). THA reported approximately half a million dollars in rental arrears among 300 plus THA tenants.
JEM, Inc (Section 8 HCR)	Type of Agency/Org: Public Housing Authority QPs served: all	Meeting	JEM reported current Section 8 waitlists are 6 months to 1.5 years, showing a need for TBRA. That being said, even those with vouchers are struggling to find units, showing an ongoing need for affordable housing development. JEM also reported the need for case management services coupled with affordable housing to ensure housing stability.
Better Community Neighborhoods, Inc	Type of Agency/Org: Affordable Housing Developer QPs served: all	Meeting	BCNI supported development of Affordable Housing units and noted the need for qualifying populations to have supportive services to ensure housing stability, once housed. In terms

			<p>of eligible activities, Better Community Neighborhoods, Inc. prioritized the following: Tenant based rental assistance and supportive services equally (1 and 1), acquisition and development of non-congregate shelters (2) and affordable housing development (3). BCNI opted for 60% of funding to be allocated to affordable housing, and equally distributed the remaining funding among the remaining three eligible activities. For qualifying populations, BCNI prioritized the following: homeless (1), fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking (2), other populations (3), and at-risk of homelessness (4). BCNI identified the following subpopulations for targeted preferences: persons with severe mental illness, persons with substance use disorder, parenting youth, persons with physical disabilities, and victims/survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking. Persons with severe mental illness were also identified as a group traditionally underserved and requiring assistance in securing housing in the City of Schenectady. In terms of strategic planning, BCNI noted the importance of aligning investments of HOME funds in the City of Schenectady with HUD designated Neighborhood Revitalization Strategy Area (NSRA) to demonstrate to HUD advancement of goals outlined in the City's Consolidated Plan.</p>
Troy Community Land Bank (TCLB)	Type of Agency/Org: Affordable Housing Developer QPs served: all	Meeting	<p>Troy Community Land Bank (TCLB) supported the use of HOME-ARP funding to build affordable housing units as well as operating funds for organizations developing units. To afford development, HOME ARP will need to be combined with other funding to complete projects. Further, TCLB noted that landbanks can provide low-cost buildings</p>
Pennrose	Type of Agency/Org: Affordable Housing Developer QPs served: all	Meeting	<p>Pennrose questioned if there were other creative ways to utilize HOME ARP funding (i.e., utilizing service providers instead of going through CE/CoC referrals, asked if there were ways to bring on additional private leveraging by putting funding into an acquisition loan fund). Pennrose noted the need to work with</p>

			other supportive housing programs that have funding available to assist HOME-ARP activity building. The organization proposed that at least 10-acres of land are needed (at \$150,000 per acre) to develop units.
AIK Property Group	Type of Agency/Org: Affordable Housing Developer QPs served: all	Meeting	AIK inquired how funding allocations would be distributed between the three cities. AIK noted that HOME-ARP funding would be helpful when filling in capital funding gaps.
Albany Housing Coalition, Inc. (AHC)	Type of Agency/Org: Veteran's Group QPs served: Veterans	Survey	In terms of prioritization, AHC ranked eligible activities in the following priority order; supportive services (1), tenant based rental assistance (2), affordable rental units (3) and non-congregate shelters (4). However, AHC also noted that 60% of funding should go to the acquisition of non-congregate shelters and equally prioritized the remaining eligible activities. AHC prioritized the following QPs: homeless(1), at-risk of homelessness (2) fleeing or attempting to flee DV, sexual assault, stalking or human trafficking (2), and finally, other populations (4). AHC determined the following subpopulations for targeting: households who have been chronically homeless, persons with severe mental illness, persons with substance use disorder, veterans/families with a veteran member and persons exiting the criminal justice system. AHC also stated that underserved populations including those “severely addicted that will not seek assistance” require special housing like state run mental health institutions. Lastly, this stakeholder provided feedback to incentivize those to seek help, get help, and continue successfully (with recovery).
Boys and Girls Club of the Capital Area (BGC)	Type of Agency/Org: Non-profit youth development and leadership agency QPs served: all	Survey	In terms of eligible activities, the Boys and Girls Club of the Capital Area prioritized the following activities in this order: tenant based rental assistance (1), affordable housing (2), acquisition and development on non-congregate shelters (3) and supportive services (4). BGC opted to allocate 20% of funding to tenant based rental assistance, 20% to affordable housing, 40% to supportive services and 40% to acquisition and development of non-congregate shelters. When asked about QPs, BGC prioritized the following in order: fleeing or attempting to flee domestic violence, sexual

			<p>assault, stalking or human trafficking (1), at-risk of homelessness (2), other populations (3), and finally, homeless (4). In terms of targeting subpopulations for preferences, BGC identified persons in unsheltered situations, victims/survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking, persons exiting the criminal justice system, veterans/families with a veteran members and unaccompanied youth. When asked about underserved populations, BGC noted a need to assist persons with severe mental health issues and persons with developmental issues.</p>
CAPTAIN Community Human Services	<p>Type of Agency/Org: Non-profit human services QPs served: all</p>	Survey	<p>In terms of eligible activities, CAPTAIN prioritized the following in this order: affordable housing (1), tenant based rental assistance (2), acquisition and development of non-congregate shelters (3), and supportive services (4). CAPTAIN's allocation preference was 80% to supportive services and 20% to the acquisition and development of non-congregate shelters. When asked about QPs, CAPTAIN prioritized the following in order: homelessness (1), at-risk of homelessness (2), and equally prioritized fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking and other populations (3). CAPTAIN identified the following subpopulations for targeted preferencing: victims/survivors of domestic violence, dating violence, sexual assault, stalking and human trafficking, persons with severe mental illness, persons in unsheltered situations and unaccompanied youth. In terms of underserved populations, CAPTAIN identified youth aging out of foster care and/or youth programming/services into adult programming/services.</p>
Catholic Charities Housing Office (CCHO)	<p>Type of Agency/Org: Non-profit organization providing housing and supportive services QPs served: all</p>	Survey	<p>In terms of eligible activities, Catholic Charities Housing Office prioritized the following in this order: supportive services (1), tenant based rental assistance (2), acquisition and development of non-congregate shelter (3), and finally affordable rental housing (4). CCHO opted to allocate 40% of funding to affordable housing, and equally fund all remaining eligible activities (20% each). When asked about QPs, CCHO prioritized at-</p>

			<p>risk of homelessness (1), other populations (2), fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking (3), and homeless (4). The following subpopulations were identified for targeted preferencing, persons exiting the criminal justice system, sex offenders, households who have been chronically homeless, persons in unsheltered situations, and persons with severe mental illness. CCHO also identified the LGBTQ+ community as an underserved population.</p>
<p>Catholic Charities Tri County (Roarke Center) (CCRC)</p>	<p>Type of Agency/Org: Non-profit resource center QPs served: all</p>	<p>Survey</p>	<p>In terms of eligible activities, CCRC prioritized the following in order: acquisition and development of non-congregate shelters (1), affordable housing development (2), supportive services (3) and tenant based rental assistance (4). CCRC suggested 40% of funding to tenant based rental assistance and equal distribution of funds among the remaining eligible activities. When asked about QPs, CCRC identified the following prioritization: at-risk of homelessness (1), fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking (2), other populations (3) and homeless (4). CCRC noted the following subpopulations for preference: under-employed, persons with developmental disabilities, victims/survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking, and households who have been chronically homeless.</p>
<p>DePaul Community Services</p>	<p>Type of Agency/Org: Non-profit organization that provides addiction prevention, supportive services, affordable housing, mental health residences, senior living communities, supportive programs and vocational programs QPs served: all</p>	<p>Survey</p>	<p>In terms of eligible activities, DePaul Community Services equally prioritized all activities. Funding allocation preference was for affordable housing development and support services. When asked about QPs, other populations were prioritized with all other QPs receiving equal priority (after other populations). DePaul Community Services further identified the following subpopulations for targeted preference: sex offenders, parenting youth, persons with developmental disabilities, persons with physical disabilities, persons with HIV/AIDS, victims/survivors of domestic violence, dating violence, sexual assault, stalking, or human trafficking, persons with severe mental illness and persons with substance</p>



			use disorder.
Joseph's House and Shelter	Type of Agency/Org: Emergency Housing and Support Services Organization QPs served: all	Survey, Forum, and One-on-One meeting	During a one-on-one meeting, Joseph's House and Shelter noted a need for more funding for outreach programs to assist serving unsheltered homelessness and to fund an ongoing diversion program, which supports households in identifying alternative resources to prevent homelessness. They confirmed a need for non-congregate shelter, especially for families, and affordable housing development for seed money or completing projects. They support investing in capacity building and operations. Five (5) staff members responded to the stakeholder survey for Joseph's House and Shelter. In terms of eligible activities, most respondents prioritized the following: tenant based rental assistance (1), acquisition and development of non-congregate shelters (2), supportive services (3) and finally, affordable housing development (4). Funding allocation emphasis was placed on acquisition and development of non-congregate shelters and affordable housing development, equally at 40% for each activity. The remaining two eligible activities were given equal distribution of remaining funds (10% each). When asked about QPs, Joseph's House and Shelter identified the following priorities: homeless (1), at-risk of homelessness (2), other populations (3) and finally, fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking (4). Joseph's House and Shelter staff identified the following subpopulations for targeted preference: persons in unsheltered situations, persons with severe mental illness, persons with substance use disorder, victims/survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking, households who have been chronically homeless and persons exiting the criminal justice system. Furthermore, the following subpopulations were noted with a need for services because they are traditionally underserved: those with mental illness, Black, Indigenous and Persons of Color (BIPOC), women of color, those with substance use disorder and persons participating in sex work.

Mohawk Opportunities, Inc.	Type of Agency/Org: Non-profit organization committed to helping individuals living with mental illness, HIV/AIDS and the homeless QPs served: all	Survey	Two (2) staff members responded to the stakeholder survey for Mohawk Opportunities. In terms of eligible activities, Mohawk Opportunities prioritized the following: supportive services (1), acquisition and development of non-congregate shelters (2), supportive services (3) and affordable housing development (4). The following funding allocations were suggested by Mohawk Opportunities: affordable housing development (40%), tenant based rental assistance (40%), supportive services (20%) and acquisitions and development of non-congregate shelters (20%). When asked about QPs to prioritize, Mohawk Opportunities selected the following prioritization: homeless and other populations (1), at-risk of homelessness (2) and finally, fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking.
New Choice Recovery Center	Type of Agency/Org: Addiction recovery organization QPs served: all	Survey	In terms of eligible activities, New Choice Recovery Center prioritized the following: acquisition and development of non-congregate shelters (1), supportive services (2), tenant based rental assistance (3) and affordable rental housing development (4). The organization suggested allocating 60% of funding to affordable rental housing development, 20% to tenant based rental assistance, 20% to supportive services and 0% to acquisitions and development of non-congregate shelters. The organization mentioned it is well equipped with non-congregate shelters but needs short- and long-term rent assistance. When asked about what QPs to prioritize, New Choice Recovery Center suggested the following: other populations (1), at-risk of homelessness (2), homeless(3) and finally, fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking (4). New Choice Recovery Center noted that the following subpopulations should be targeted for preferences: persons in unsheltered situations, persons exiting the criminal justice system, sex offenders, and persons with severe mental illness. Lastly, the organization strongly advocated for landlord incentives/financial support to help encourage landlords to work with grant funded programs.

Rensselaer County Department of Mental Health	Type of Agency/Org: City organization that specializes in assisting individuals with mental illness by providing supportive services QPs served: all	Survey	In terms of eligible activities, Rensselaer County Department of Mental Health suggested the following priorities in order: acquisition and development of non-congregate shelters (1), tenant based rental assistance (2), supportive services (3) and finally, affordable rental housing development (4). When asked about funding allocation, the organization suggested 40% funding for affordable rental housing development with remaining funds distributed equally among remaining eligible activities (20% to tenant based rental assistance, 20% to supportive services, and 20% to acquisition and development of non-congregate shelters). When asked about QPs to prioritize, the organization suggested the following in order: homeless (1), fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking (2), other populations (3) and finally at-risk of homelessness (4). The organization also identified the following subpopulations for targeted preference: households who have been chronically homeless, persons in unsheltered situations, persons with severe mental illness, unaccompanied youth and persons with substance use disorder. The organization also identified the following groups as historically underserved: LGBTQ+ populations, individuals with co-occurring disorders (mental health and substance abuse), and single parents of one child. Lastly, the organization advocated for continued engagement with stakeholders and those with lived experience in homelessness in all new initiatives.
Safe Inc. of Schenectady	Type of Agency/Org: Homeless youth housing and support agency QPs served: all, specifically youth	Survey	In terms of eligible activities, Safe Inc., suggested the following priorities: acquisition and development of non-congregate shelters (1), tenant based rental assistance (2), supportive services (3) and finally, affordable rental housing development (4). The organization further suggested the following funding allocations: 40% of funding to affordable rental housing development, 40% of funding to supportive services, and 20% to tenant based rental assistance. 0% funding was suggested for acquisitions and development of non-congregate shelters. When asked about prioritizing QPs,

			<p>Safe Inc. suggested the following: fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking (1), homeless (2), at-risk of homelessness (3) and other populations (4). Additionally, Safe Inc identified the following subpopulations for targeted preference: unaccompanied youth, victims/survivors of domestic violence, sexual assault, stalking or human trafficking, households who have been chronically homeless and persons with severe mental illness. In terms of populations traditionally underserved by services, Safe Inc identified youth in foster care and human trafficking survivors. Lastly, the organization noted an increased need for transitional living as more families become homeless due to the increased cost of living. It also noted the need to break generational homelessness by assisting young adults before they become the next generation of homeless adults.</p>
<p>Schenectady Community Action Program (SCAP)</p>	<p>Type of Agency/Org: Non-profit resource center that provides transitional and permanent housing as well as supportive services QPs served: homeless, at-risk of homelessness, other</p>	<p>Survey, Forum, One-on-One Meeting</p>	<p>During a one-on-one meeting, SCAP confirmed the need to fund TBRA – specifically for security deposits, mental health mobile crisis, non-congregate shelter, and affordable housing development. It did not believe a landlord navigator is needed because each agency has its own relationships with landlords. Seven (7) representatives from SCAP participated in the stakeholder survey. In terms of eligible activities, SCAP prioritized the following in order: equal prioritization of supportive services and acquisition and development of non-congregate shelter (1), affordable rental housing (2) and tenant based rental assistance (3). Funding allocation suggestions were identified as follows: 20% to tenant based rental assistance, and 20% to supportive services. Funding was recommended for affordable rental housing and acquisition and development of non-congregate shelters (60% to non-congregate shelters and 40% to affordable rental housing). When asked about QPs to prioritize, SCAP identified the following prioritization: fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking (1), homeless (2), at-risk of homelessness (3), and finally other populations</p>

			(4). In terms of subpopulations for targeted preference, SCAP identified the following: sex offenders, persons with substance use disorder, persons with severe mental illness, persons with developmental disabilities, persons exiting the criminal justice system, households who have been chronically homeless, unaccompanied youth and veterans/families with a veteran member. Lastly, SCAP noted that the following populations have been traditionally underserved: trans community, persons with substance use disorder and persons with severe mental illness/disabilities.
Bethesda House	Type of Agency/Org: Non-profit housing and shelter provider QPs: homeless, at-risk of homelessness	Forum and One-on-One Meeting	During a one-on-one meeting, Bethesda House confirmed the need for non-congregate shelter, TBRA – specifically for security deposits, mobile mental health, and affordable housing development. They agreed with limiting funds for rental arrears, given the inability to meet the need through limited HOME-ARP funds. They also support non-profit operations and capacity building and reported a specific need for increasing safety for staff and clients.
St. Anne Institute	Type of Agency/Org: Non-profit agency serving youth and families QPs served: all Subpop focus: youth	Survey and Forum	In terms of eligible activities, St. Anne Institute prioritized the following: acquisition and development of non-congregate shelter (1), affordable rental housing development (2), tenant based rental assistance (3) and supportive services (4). Funding allocation suggestions are as follows: 60% to supportive services, 20% to tenant based rental assistance and 20% to affordable rental housing development (0% to acquisition and development of non-congregate shelter). When asked about QPs, St. Anne Institute identified the following in priority order: at-risk of homelessness (1), homeless (2), fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking (3) and other populations (4). St. Anne Institute identified the following subpopulations for targeted preferences: parenting youth, persons exiting the criminal justice system, victims/survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking, households who have been chronically homeless and persons with severe mental illness. Furthermore, the organization

			identified the following groups as traditionally underserved populations: minority groups, adults leaving the criminal justice system (particularly sex offenders), as well as poor and unemployed persons/families.
St. Paul's Center, Inc.	Type of Agency/Org: Emergency housing provider QPs served: homeless and at-risk of homelessness, specifically families	Survey, Forum, One-on-One Meeting	During a one-on-one meeting, St. Paul's Center confirmed a need for non-congregate shelter – specifically for youth, TBRA – specifically for security deposits, mobile mental health services, and supporting completion of affordable housing developments given increases in construction costs. In terms of eligible activities, St. Paul's Center, Inc. prioritized the following : acquisitions and development of non-congregate shelters (1), supportive services (2), tenant based rental assistance (3) and finally, affordable rental housing development (4). Funding allocation suggestions by the organization are as follows - 40% to affordable rental housing development, 40% to tenant based rental assistance, 20% to supportive services, and 0% to acquisition and development of non-congregate shelters. When asked about QPs to prioritize, St. Paul's Center, Inc. suggested the following: homeless (1), fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking (2), at-risk of homelessness (3) and other populations (4), St. Paul's Center, Inc identified the following subpopulations for targeted preference: households who have been chronically homeless, unaccompanied youth, parenting youth, persons with severe mental illness, and persons with developmental disabilities. When asked about populations traditionally underserved, the organization mentioned Black, Brown, Indigenous, and Persons of Color (BIPOC) families and individuals. It also noted families who have an advocate when apartment searching are more likely to be accepted by landlords who are weary of renting to families b/c of potential physical damage and noise concerns from children. Setting aside funds to repair damage caused by families was requested by St. Paul's Center, Inc. This organization noted that the at-risk of homelessness population has increased and needs support.

YWCA North Eastern NY	Type of Agency/Org: Non-profit organization that provides domestic violence supportive services, affordable housing, and supportive services for women QPs served: all	Survey	In terms of eligible activities, YWCA prioritized the following: tenant based rental assistance (1), acquisition and development of non-congregate shelters (2), supportive services (3), and affordable rental housing development (4). YWCA suggested the following funding allocations, 40% to affordable rental assistance, 40% to supportive services, 20% to tenant based rental assistance and 20% to acquisitions and development of non-congregate shelters. When asked about QPs to prioritize, YWCA suggested the following in priority order: fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking (1), homeless (2), at-risk of homelessness (3) and finally, other populations (4). YWCA identified the following subpopulations for targeted preference, victims/survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking, persons exiting the criminal justice system, persons with severe mental illness and under employed individuals and families. Furthermore, YWCA identified the following subpopulations as those who are traditionally underserved but require assistance: Black, Brown, Indigenous and Persons of Color (BIPOC), DV survivors, and Guyanese.
Unity House	Type of Agency/Org: Human service agency that assists those in poverty, adults living with mental illness, HIV/AIDS, children with developmental delays and victims of domestic violence QPs served: all	Forum	Unity House was in favor of the funding allocations presented by CARES at the forum. The organization noted there is a need to fund services for “Other Populations” in QPs. Unity House commented that there is existing funding in the community to assist the Fleeing or Attempting to Flee Domestic Violence, Sexual Assault, Stalking, or Human Trafficking QP.
Equinox	Type of Agency/Org: Non-profit organization that serves adults and youth with chemical dependency QPs served: all	Forum	Equinox noted the proposed funding allocation for non-congregate shelters is too small to have an impact and noted the need to marry HOME-ARP funding with other funding sources to make projects viable.
Legal Aid Society of Northeastern NY	Type of Agency/Org: Legal services QPs served: all	Forum	Legal Aid Society of Northeastern NY agreed with the funding allocations presented at the public forum. The organization noted the need to open affordable housing to all qualifying

			populations, specifically prioritizing the at-risk population as it has increased post-pandemic due to rising rent costs.
TRIP	Type of Agency/Org: Non-profit organization providing homeownership and rental assistance services and development QPs served: all	One-on-One Meeting	During a one-on-one meeting, TRIP confirmed a need for affordable housing development with accessible units, and funding to provide supportive services to those in the units who have addiction and/or mental health disorders. It also recommended funding be utilized to educate renters in arrears due to the eviction moratoria on the impact this will have on their finances moving forward.
The Altamont Program, Inc	Type of Agency/Org: Organization that specializes in the treatment of alcoholism, opioid addiction, substance abuse, and dual diagnosis. QPs served: all	Forum	No substantial feedback.
Center for Community Justice Schenectady	Type of Agency/Org: legal services QPs served: all	Forum	No substantial feedback.
Soldier On	Type of Agency/Org: Non-profit organization that aims to prevent and end veteran homelessness QPs served: all, veterans	Forum	No substantial feedback.
Capital District Women Veterans Program – Christopher House	Type of Agency/Org: Organization that provides supportive services, housing, and community for women veterans QPs served: all, veterans	Forum	No substantial feedback.
United Tenants of Albany	Type of Agency/Org: Non-profit organization that provides legal services (tenant based) for low- and moderate-income individuals and families QPs served: all	Forum	No substantial feedback.



Interfaith Partnership for the Homeless (IPH)	Type of Agency/Org: Non-profit housing and shelter provider QPs served: all	Forum	No substantial feedback.
Schenectady County Legislature	Type of Agency/Org: County legislature QPs served: all	Forum	No substantial feedback.
Regan Development	Type of Agency/Org: Affordable Housing Developer QPs served: all	Meeting	No substantial feedback.
Capital Region Land Bank & Schenectady Metroplex Development Authority	Type of Agency/Org: Affordable Housing Developer QPs served: all	Meeting	No substantial feedback.
DePaul	Type of Agency/Org: Affordable Housing Developer QPs served: all	Meeting	No substantial feedback.
Albany County Land Bank	Type of Agency/Org: Affordable Housing Developer QPs served: all	Meeting	No substantial feedback.

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

As noted in the chart above, stakeholders who participated in the survey and forum evenly prioritized affordable rental housing development and supportive services as activities most needed to reduce homelessness and increase housing stability within the City of Schenectady, City of Troy, and Town of Colonie. However, votes for TBRA and acquisition and development of non-congregate shelters followed closely behind, indicating that the respondents feel there is a need to fund all four eligible activities. In terms of funding, participants recommended allocating 20% to TBRA, 20% to supportive services, 20% to acquisition and development of non-congregate shelters, and 40% to affordable rental housing development. During the affordable housing developer meeting, a concern was raised about the limited and insufficient funds in HOME-ARP to develop housing, coupled with the HOME-ARP regulatory requirements which drive up development costs (i.e. Davis Bacon). Developers and stakeholders that attended the stakeholder forum noted a desire to utilize the funding for property acquisition and to use the funds for existing projects to offset the sometimes unplanned increased cost of construction. In terms of supportive services, stakeholders across the board emphasized a need to assist those experiencing or at risk of homelessness who have mental health needs. Stakeholders debated the benefits of utilizing supportive service dollars for landlord incentives; some stakeholders felt that this would be a productive use of funds to build goodwill with landlords, and others felt the money would be better spent on direct activities benefiting clients. Stakeholders also debated the potential benefits of utilizing funds to staff a Landlord Navigator who would be charged with building relationships with landlords to increase the supply of available rental units. Some stakeholders felt that this would be a good use of funds while others felt that this role is already being performed by homeless service agencies and therefore a duplication of effort. Stakeholders at the forums noted a need to use tenant-based rental assistance funds for security deposits which is an existing barrier for households wanting to rent. Attendees noted that additional rental assistance

is not as great a need as the other activities, provided the existing community resources for this purpose (i.e. NYS Rental Supplement Program, a state program funding permanent rental assistance). When asked about non-profit operating and capacity building, some agencies advocated investing funds in these activities.

Stakeholders prioritized the qualifying populations in the following order: first – homeless; second - fleeing or attempting to flee domestic violence; sexual assault, stalking or human trafficking; third - at-risk of homelessness and fourth - other populations experiencing or at greatest risk of housing instability. Stakeholders also identified subpopulation preferences to include persons with severe mental illness; victims/survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking; persons exiting the criminal justice system; persons with substance use disorder; and households who have been chronically homeless. Feedback from stakeholders (both via survey and forum) identified a need for housing that is actively affirming of the LGBTQ+ population, prioritizing youth for housing, and mitigating racial disparities in all services. Lastly, due to the lack of funding streams that allow for flexibility, stakeholders did not want to specify any subpopulation for targeted preference.

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

## Public Participation

In accordance with Section V.B of the Notice (page 13), 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.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

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

- ***Date(s) of public notice: 12/01/2022***
- ***Public comment period: 12/16/2022 through 01/06/2023***
- ***Date(s) of public hearing: 11/15/2022, 11/16/2022, 12/22/22 (Troy), 12/27/22 (Schenectady)***

*Describe the public participation process:*

In accordance with the requirements of the HOME-ARP program, public participation was encouraged through an online survey, subsequent public hearing and public comment period. Materials, including a flyer, email notifications and an online registration page (via Eventbrite) were all translated into Spanish, a common first language in the City of Schenectady, City of Troy, and Town of Colonie. Flyers were distributed at public locations, such as libraries and City Hall. CARES promoted the availability of special accommodations and/or translation

services through email notifications which included an announcement email and a follow up email reminding invitees of the forum how to register and how to request translation services and/or special accommodations, and on the dedicated Consortium HOME-ARP page on the CARES website. Additionally, the CARES website works in tandem with browser extensions and built-in support applications to provide translation and special accommodations (i.e., read aloud capabilities). The events were also promoted on the City of Schenectady, City of Troy, and Town of Colonie websites. Email invitations for the public forum were sent on October 28<sup>th</sup>, 2022, to local stakeholders, government officials, and neighborhood associations, with a seventeen (17) day advance notice to invitees of the forum. All recipients were asked to share the invitation with their own contacts/listservs.

A public survey was distributed between August 15<sup>th</sup>, 2022, and August 29<sup>th</sup>, 2022. The survey detailed the HOME-ARP program, stated the funding amount allocated to the City of Schenectady, City of Troy, and Town of Colonie and requested feedback from community members on which eligible activities and qualifying populations were in the most need of assistance to reduce homelessness within the city. The survey also asked which subpopulations might need prioritization and whether there were traditionally underserved populations that were not captured within the survey. A second survey was distributed to the public (same methods as the first survey) on November 11<sup>th</sup>, 2022. Within this survey, the public was polled on agreement with the funding allocation amounts (described below under ‘Activities’) with the following results:

- 1) 100% of respondents agreed with the funding amount allocated to affordable housing development.
- 2) 90% of respondents agreed with the funding amount allocated to Supportive Services.
- 3) 90% of respondents agreed with the funding amount allocated to tenant-based rental assistance, specifically for security deposits.
- 4) 90% of respondents also agreed with the funding amount allocated to the acquisition and development of non-congregate shelters.

This final survey closed on November 18<sup>th</sup>, 2022 and was promoted at the two public forums (held on November 15<sup>th</sup>, and November 16<sup>th</sup>, 2022) where CARES staff were present and provided an overview of the proposed Allocation Plan.

On November 15<sup>th</sup>, 2022, and November 16<sup>th</sup>, 2022 virtual public hearings were held via Zoom. On November 15<sup>th</sup>, 2022, CARES presented to twenty-nine (29) individuals who attended (to increase participation, the zoom link was shared fifteen minutes before the event for all invited). On November 16<sup>th</sup>, 2022, CARES presented to fourteen (14) individuals who attended. At these two hearings, CARES displayed the funding amount allocated to the Consortium (City of Schenectady, City of Troy, and Town of Colonie), outlined funding amount recommendations for the four eligible activities and suggested preferences for qualifying populations to serve. After the presentation, the hearing was opened up for questions and feedback. Clarification was requested on the potential RFP process for non-congregate shelters, to be determined was the reply. CARES shared the timeline of the next steps within the HOME-ARP process. Public notification of the public comment period was made on December 1, 2022 giving a fourteen (14) day notice that the public comment period would be available for 23 days beginning December 14<sup>th</sup>, 2022. Notification of the public comment period was placed on the CARES website via flyer (posted on December 1, 2022), promoted through local newspapers in Schenectady, Troy and Town of Colonie (i.e., The Gazette (Schenectady); Troy Record (Troy); Colonie Spotlight (Colonie)), and posted on the City of Schenectady, Troy and Town of Colonie’s websites. [\(Return here for Public Comment Period input\)](#)

#### *Describe any efforts to broaden public participation:*

A public survey and information on the upcoming public hearings were issued through various channels including the CoC membership distribution list, local government officials and neighborhood associations. All entities were asked to share the information with their staff, clients, constituents, and network. The survey and public hearing information were also sent to organizations that have a broad reach with the general public in the City of

Schenectady, City of Troy, and Town of Colonie with a request that these organizations forward the information to their own listservs, including: Schenectady County Human Rights Commission, Habitat for Humanity, and United Way for the Greater Capital Region. The survey and public hearing information were also sent to organizations that serve traditionally underserved populations including Citizen Action, Pride Center (LGBTQ+ members), Planned Parenthood, and the regional Boys and Girls Club (of Schenectady, Troy and Lansingburgh that all work with individuals and families). CARES posted on its website the following: the public survey, funding amount allocated to the Consortium, list of eligible activities and qualifying populations for services, the public hearing date and link to the virtual meetings. Marketing materials for the public hearing (i.e. flyers) were created and sent to the jurisdiction leaders for distribution through their email lists, website, and social media sites to encourage public participation. Flyers promoting the public hearings were posted in public locations, such as libraries. Materials for the public hearing were translated into Spanish, posted on the CARES website, and distributed to the Consortium for posting on jurisdiction websites. Requests for special accommodations or translation services options were made available to the public through email blasts detailing the public forum (in English and Spanish) and on the CARES HOME-ARP webpage. The allocation plan posting to secure public comment was announced through email blasts utilizing the same outreach method as the public survey. The public comment period of December 14<sup>th</sup>, 2022 through January 6<sup>th</sup>, 2023 (twenty-three (23) days) was announced to the public on December 1, 2022 (via flyer on the CARES website, promoted in local newspapers within the City of Schenectady, City of Troy, and Town of Colonie and published on the Consortium's cities websites, respectively). In this notice, the public was advised to send comments and requests for special accommodations and/or translations for reviewing the allocation plan to Genesis Matthey, Planning Associate for CARES of NY, Inc.

*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 either in writing, or orally at a public hearing:*

In mid-August 2022, a survey was distributed to the public by email. CARES sent this survey to the following local entities: CoC members (comprised of 273 members) whose geographical areas included the City of Schenectady, City of Troy, and Town of Colonie, stakeholders that serve traditionally underserved populations, social justice organizations, city council members, neighborhood associations and community action partners. CARES requested that they also share the survey with their own staff, clients, and/or listservs. This survey asked respondents their opinion and ranking preference on eligible activities to best address homelessness and housing instability and about the need among qualifying populations, and subpopulations impacted by homelessness and housing instability. Fifty-four (54) participants responded to the survey. Of these respondents, a majority favored prioritizing affordable housing and the development of non-congregate shelters among eligible activities. In terms of funding allocation, 40% ranked funding affordable rental housing development first and 20% for the remaining eligible activities. 30% of participants prioritized homeless as the priority qualifying population and 28.3% of participants ranked as first priority those fleeing or attempting to flee domestic violence, sexual assault, stalking or human trafficking. Participants also selected subpopulations for targeted preference for services with the top five ranked in preference as 1) victims/survivors of domestic violence, dating violence, sexual assault, stalking, or human trafficking, 2) persons with severe mental illness, 3) households who have been chronically homeless, 4) persons in unsheltered situations and 5) persons with substance use disorder. When asked about other populations that have been traditionally underserved and/or discriminated against, 31.5% of participants noted the need to target resources to persons with severe mental illness. One related comment emphasized the need for housing for those living with severe mental illness to accommodate the increasing numbers of homeless individuals living with severe and persistent mental illnesses.

Polling during the public hearing showed favor of the following funding allocation: 44% for affordable housing development, 16% for supportive services, 15% for the development of non-congregate shelters and 9% to tenant-based rental assistance (an additional 15% is set aside for administration and planning). Substantial feedback from public participants included the need to ensure that all qualifying population can apply for affordable housing and that funding allocation percentages should be flexible based on new or changing needs overtime. Further guidance on the to be determined RFP process and the timeline for next steps was provided.

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

Affordable housing developers advocated to invest HOME-ARP funds in acquisition of property. The PJ decided not to prioritize acquisition of property for affordable housing development, as it was deemed a risky use of funds. Stakeholders and developers also advocated for investment of funds in Non-Profit Operating and Capacity Building. The PJ decided not to allocate funds to these activities as there are existing, sufficient organizations with the operating capacity to carry out HOME-ARP funded activities.

Survey participants reported that the following subpopulations should be prioritized for funding: 1) persons with severe mental illness, 2) households who have been chronically homeless, 3) victims/survivors of domestic violence/dating violence/sexual assault/stalking or human trafficking, 4) persons exiting the criminal justice system, and 5) persons in unsheltered situations. However, stakeholders advocated to not create a preference for specific subpopulations with HOME-ARP funds, as there is intersectionality among many of the subpopulations highlighted, and there are limited funding sources that offer the flexibility to work with multiple subpopulations. As such, the PJ decided to not create a preference for any subpopulations when implementing HOME-ARP funding.

## **Needs Assessment and Gaps Analysis**

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. 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.

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.**

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

About the Primary Jurisdiction – Schenectady HOME Consortium, including the City of Schenectady, City of Troy, and Town of Colonie, NY

City of Schenectady:

The City of Schenectady, located in Schenectady County, NY is home to 66,990 residents across eleven square



miles. According to data from the United States Census Bureau<sup>1</sup>, the city's population is diverse with 57 percent of the population identified as White, 20 percent as Black or African American, and 10 percent as two or more races. About one in nine (11 percent) identify as Hispanic or Latino. Of the city's population, 5 percent are Veterans and nearly one in five residents (19 percent) are under 18 years of age. The aging population of people 65 years and over comprises 14 percent of the city's total population. According to the Census Bureau, the average number of people per household is 2.5. Additionally, data shows that one in five (20 percent) residents live in poverty with the per capita income in the past 12 months less than \$26,000. At the per capita income, the median gross rent (2016-2020) of \$919 would consume more than 40 percent of these households' annual income before taxes.

#### City of Troy:

The City of Troy, located in Rensselaer County, NY, is home to 50,394 residents across 10 square miles. According to data from the United States Census Bureau, the city's population is diverse with 66 percent of the population identified as White, 17 percent as Black or African American, and 9 percent as two or more races. One in ten (10 percent) identify as Hispanic or Latino. Of the city's population, 4 percent are Veterans and nearly one in five residents (19 percent) are under 18 years of age. The aging population of people 65 years and over comprise 12 percent of the city's total population. According to the Census Bureau, the average number of people per household is 2.2. Additionally, data shows that one in five (23 percent) of residents live in poverty with the per capita income in the past 12 months as less than \$28,000. At the per capita income, the median gross rent (2016-2020) of \$964 would consume more than 40 percent of these households' annual income before taxes.

#### Town of Colonie:

The Town of Colonie, located in Albany County, NY is home to 85,461 residents across 56 square miles. According to data from the United States Census Bureau, the town's population is mostly comprised of White residents (78 percent), 5 percent as Black or African American, and 10 percent as Asian. One in twenty (5 percent) identify as Hispanic or Latino. Of the town's population, 5 percent are Veterans and nearly one in five residents (19 percent) are under 18 years of age. The aging population of people 65 years and over comprise 19 percent of the town's total population. According to the Census Bureau, the average number of people per household is 2.4. Additionally, data shows that one in five of residents live in poverty, with the per capita income in the past 12 months as less than \$41,000. At the per capita income, the median gross rent (2016-2020) of \$1,178 would consume more than 34 percent of these households' annual income before taxes.

### About the Qualifying Populations

#### **a. Homeless as defined in 24 CFR 91.5**

To understand the size and demographic composition of the homeless population as defined by 24 CFR 91.5, demographic, data on these homeless clients served by each respective CoC's Coordinated Entry (CE) program during the most recent HUD fiscal year (10/1/2020 – 9/30/2021) was analyzed through the Annual Performance Report (APR) metrics.

#### NY-507 CoC – Schenectady County, including the City of Schenectady

- Of the 827 adult clients in this category, 51 percent are Male.
- Of the 1,153 clients served in Coordinated Entry, 10 percent meet the criteria for chronic homelessness.
- Of all 1,153 clients being served in Coordinated Entry during the fiscal year, Black, African American, or African clients make up 51 percent of the clients being served by the program. For comparison, 57 percent of city of Schenectady residents are white and 20 percent are Black, African American, or African.

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<sup>1</sup> [U.S. Census Bureau QuickFacts: United States](#)

- Hispanic/Latin(a)(o)(x) clients make up 19 percent of the clients served by Coordinated Entry in the previous fiscal year although Hispanic/Latin(a)(o)(x) residents make up approximately 11 percent of the city's population.
- At least 41 percent of all clients served in Coordinated Entry had a diagnosed Mental Health Condition (471 clients) and 23 percent (262 clients) reported a physical disability.
- Of the clients served in the program, 42 percent reported having two or more chronic health conditions at program start.
- Of the adult clients served in Coordinated Entry, 21 percent experienced Domestic Violence in their lifetime and 30 percent of those who experienced Domestic Violence were fleeing Domestic Violence while in program.
- One in four adult clients (25 percent) entered the Coordinated Entry program with no income.

NY-512 CoC – Rensselaer County, including the City of Troy

- Of the 352 adult clients in this category, 41 percent are Male.
- Of the 470 clients served in Coordinated Entry, 11 percent meet the criteria for being chronically homeless.
- Of all 470 clients being served in Coordinated Entry during the fiscal year, Black, African American, or African clients make up 47 percent of the clients being served by the program although Black, African American, or African residents only comprise 17 percent of the city of Troy's population.
- Hispanic/Latin(a)(o)(x) clients make up 11 percent of the clients served by Coordinated Entry in the previous fiscal year. For comparison, Hispanic/Latin(a)(o)(x) residents comprise 10 percent of the city's population.
- At least 41 percent of all clients served in Coordinated Entry had a diagnosed Mental Health Condition (191 clients) and 16 percent (75 clients) reported a physical disability.
- Of the clients served in the program, 35 percent reported having two or more chronic health conditions at program start.
- Of the adult clients served in Coordinated Entry, 23 percent experienced Domestic Violence in their lifetime and 18 percent of those who experienced Domestic Violence were fleeing Domestic Violence while in program.
- One in four adult clients (27 percent) entered the Coordinated Entry program with no income.

NY-503 CoC – Albany County, including the Town of Colonie. **Please note, as data for only the Town of Colonie is unavailable, the below data on Albany County is being provided. This data largely represents persons from the city of Albany; the Town of Colonie likely represents a very small portion of those represented below.**

- Of the 1,164 clients served in Coordinated Entry, 12 percent (144 clients) meet the criteria for being chronically homeless.
- Of the 756 adult clients in this category, 47 percent (352) are male and 52 percent (393) are female.
- Of the adult clients served in Coordinated Entry, 19 percent are 55 years of age and older.
- Of all 1,164 clients being served in Coordinated Entry during the fiscal year, there are more Black, African American, or African clients served than White clients. In fact, Black, African American, or African clients make up 57 percent of the clients being served by the program whereas only 27 percent of clients served are White.
- Hispanic/Latin(a)(o)(x) clients make up 14 percent of the clients served by Coordinated Entry in the previous fiscal year.
- At least 32 percent of all clients served in Coordinated Entry had a diagnosed Mental Health Condition (369 clients) and 14 percent (167 clients) reported a physical disability.

- Of the clients served in the program, 29 percent reported having two or more chronic health conditions at program start.
- Of the adult clients served in Coordinated Entry, 19 percent experienced Domestic Violence in their lifetime and 23 percent of those who experienced Domestic Violence were fleeing Domestic Violence while in program.
- More than two in five adult clients (42 percent) entered the Coordinated Entry program with no income.

When looking at the HMIS CoC Annual Performance Report (10/1/2020 – 9/30/2021) for NY-503, NY-507, and NY-512, the following results are generated:

- NY-507 (including City of Schenectady): Of 4,377 clients served throughout the entire CoC during the previous fiscal year, 9 percent are chronically homeless. Of these clients, 21 percent have a physical disability as recorded during the client's admission into a CoC program. Three percent of clients reported exiting a criminal justice facility prior to entering a CoC program for services.
- NY-512 (including City of Troy): Of 2,619 clients served throughout the entire CoC during the previous fiscal year, 9 percent are chronically homeless. Of these clients, 18 percent have a physical disability as recorded during the client's admission into a CoC program. One percent of clients reported exiting a criminal justice facility prior to entering a CoC program for services.
- NY-503 (including Town of Colonie): Of 7,483 clients served throughout the entire CoC during the previous fiscal year, 7 percent are chronically homeless. Of these clients, 15 percent have a physical disability as recorded during the client's admission into a CoC program. Less than one percent of clients reported exiting a criminal justice facility prior to entering a CoC program for services. **Please note, the Town of Colonie likely represents a very small portion of those represented above.**

#### *Persons Experiencing Unsheltered Homelessness*

According to Point in Time (PIT) data<sup>2</sup>, over the past five years (2017 – 2021), the number of persons experiencing unsheltered homelessness has remained largely stagnant in Schenectady and Rensselaer Counties (averaging 20 and 13 persons, respectively), and has increased greatly in Albany County (from 25 persons in 2017 to 49 persons in 2021), showing a need for additional resources to serve this extremely vulnerable population.

#### *Veterans*

The Annual Performance Report (APR) for the operating year 10/01/2021 to 09/30/2022 in Albany (NY-503), Schenectady (NY-507), and Rensselaer County (NY-512) CoCs shows that 70 percent, 80 percent, and 79 percent respectively of Veterans exit programs to a permanent destination. On average this is more than 25 percentage points higher than the general CoC population of clients exiting programs. When so many more veterans in the homeless services system are exiting to permanent destinations, at rates significantly higher than the general population, it indicates a lesser need for new resources targeted to veterans compared to other subpopulations.

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<sup>2</sup> Unsheltered Point in Time data from HDX, <https://caresny.org/continuum-of-care/reports/>



## **b. At Risk of Homelessness as defined in 24 CFR 91.5**

The following are key findings about clients at risk of homelessness on the Coordinated Entry (CE) Priority List for prevention assistance between October 1<sup>st</sup>, 2020 (the start of the CE prevention program) and June 7<sup>th</sup>, 2022. It should be noted that until January 15, 2022, there was an eviction moratorium in place in New York State (COVID-19 Emergency Eviction and Foreclosure Act of 2020), and thus the total numbers of persons presenting as at-risk of homelessness are likely much lower than the actual number. The CoC expects a significant increase in persons presenting for eviction prevention services, with the moratorium no longer in place and courts continuing to process a backlog of evictions, over the coming year.

Schenectady County: 184 clients on the Coordinated Entry list for homelessness prevention assistance

- 66 percent of clients are Female heads of households.
- Black, African American, or African clients' representation (53%) is more than double their representation in the general population (20%).
- 40% of households report a disabling condition.
- 34% of households report being between 30-50% Area Medium Income.

Rensselaer County: 69 clients on the Coordinated Entry list for homelessness prevention assistance

- 74 percent of clients are Female heads of households.
- Black, African American, or African clients' representation (74 %) is significantly higher their representation in the general population (17%).
- 39% of households report a disabling condition.
- 35% of households report being between 30-50% Area Medium Income.

Albany County: 109 clients on the Coordinated Entry list for homelessness prevention assistance. **Please note, as data for only the Town of Colonie is unavailable, the below data on Albany County is being provided. This data largely represents persons from the city of Albany; the Town of Colonie likely represents a very small portion of those represented below.**

- 73 percent of clients are Female heads of households.
- Black, African American, or African clients' representation (72 %) is more than double their representation in the general population (29%).
- 40% of households report a disabling condition.
- 34% of households report being between 30-50% AMI.
- 6 percent of households are youth ages 18-24.

Another data source to assess the need for prevention services using HOME-ARP funds is a review of the NYS Emergency Rental Assistance Program (ERAP) data. As of November 1, 2022, 2,460 Rent Arrears applications were submitted for Schenectady County; 2,272 for Rensselaer County; and 5,491 for Albany County. In Schenectady County, 1,438 Rent Arrears payments were made averaging \$6,490 with ERAP funds; in Rensselaer County, 1,289 Rent Arrears payments were made averaging \$6,367 with ERAP funds; and in Albany County, 3,048 Rent Arrears payments were made averaging \$5,807 with ERAP funds.<sup>3</sup> Per NYS's report on ERAP Applicant Demographics<sup>4</sup>,

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<sup>3</sup> NYS OTDA ERAP, [County by Zip Code ERAP Application Counts, Through June 6, 2022](#)

<sup>4</sup> NYS OTDA ERAP, [ERAP Application Demographics, Through Nov 1, 2022](#)

60% of applicants outside of New York City earned less than 30% of AMI. This same report revealed most households applying for ERAP outside of NYC are female (66%), Non-Hispanic/Latin(a)(o)(x) (85%), and disproportionately Black or African American (36%).

Utilizing this information, one can inference a potential ongoing need for prevention funds in the amount of \$16 million (see below calculations) to prevent evictions across the PJ's area. While this is an extremely rough estimate, it shows the magnitude of ongoing need now that the eviction moratoria have lifted.

<b>County</b>	<b>Rental Arrear Applications</b>	<b>Rent Arrear Applications Paid</b>	<b>Estimated Rent Arrear Applications Pending</b>	<b>Estimated Rent Arrear Applications pending for households earning less than 30% AMI</b>	<b>Average Rent Arrear Payment</b>	<b>Estimated ongoing Rent Arrear Payment Need</b>
Schenectady	2,460	1,438	1,022	613	\$6,490	<b>\$3,978,370</b>
Rensselaer	2,272	1,289	983	590	\$6,367	<b>\$3,756,530</b>
Albany*	5,491	3,048	2,443	1,466	\$5,807	<b>\$8,513,062</b>
<b>Total:</b>	<b>10,223</b>	<b>5,775</b>	<b>4,448</b>	<b>2,669</b>		<b>\$16,247,962</b>

**\* Please note, as data for only the Town of Colonie is unavailable, this data on Albany County is being provided. This data largely represents persons from the city of Albany; the Town of Colonie likely represents a very small portion of those represented above.**

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

The City of Schenectady's primary domestic violence service provider, the YWCA of Northeastern NY, operates a domestic violence shelter.

**YWCA of Northeastern NY's Emergency Shelter**

Data for the YWCA of Northeastern NY's Emergency Shelter project from 1/1/2021 to 12/31/2021 entered into the comparable EmpowerDB was analyzed. Within the report period, 136 total persons were served.

- 89 percent of the clients were adults (age 18 or over) and the remaining 11 percent children.
- 1 Veteran and 18 youth under the age of 25 were served by the program within the report period.
- Of the 121 adults served, all (100 percent) are female.
- Of the 15 children served, 67 percent are female, and 33 percent are male. Of the 121 adults served, 90 percent are under the age of 55 years.
- Across the total 136 clients served, there were more persons of color in program than White clients (52 persons) with 41 percent of clients identified as Black, African American, or African, 3 percent identified as Asian or Asian American, and 2 percent identified as American Indian, Alaska Native, or Indigenous, 38 percent identified as White, and data was not available for 16 percent of clients. Of total clients served, 6 percent identified as Hispanic or Latin(a)(o)(x).
- Within the program, the highest reported health conditions were Mental Health Disorders, Physical Disabilities, and Chronic Health Conditions with at least 4 clients suffering from the conditions.

- Of the 121 total adults served by the program, 80 percent of the clients did not have income data entered into the HMIS, but of the 20 percent of clients that did have data available, 50 percent of those clients (12 of 24) entered the program with no income at program start.

The City of Troy's Victim Service Provider's comparable database (EmpowerDB utilized by Unity House of Troy for OVW TH/UH-374 and the Domestic Violence Shelter) reported over 300 clients residing in emergency shelter or transitional housing programs during the previous calendar year (1/1/2021 – 12/31/2021).

#### Unity House's OVW (Office of Violence Against Women) Transitional Housing/UH-374

Data for the Unity House (OVW TH) Transitional Housing project from 1/1/2021 to 12/31/2021 entered into the comparable EmpowerDB was analyzed. Within the report period, 22 total persons were served

- 50 percent of the clients were adults (age 18 or over) and 50 percent children.
- Of the 11 adults served, 100% are female. Of the 11 children served, 27 percent are female, and 64 percent are male.
- Of the 11 adults served, all are under the age of 55 years.
- Of the 22 clients served, 59 percent of clients identified as Black, African American, or African and 41 percent identified as White and 5 percent identified as Hispanic or Latin(a)(o)(x). Of the 11 total adults served by the program, 36 percent entered the program with no income.

#### Unity House's Domestic Violence Emergency Shelter

Data for the Unity House (NYS OTDA funded) Emergency Shelter project from 1/1/2021 to 12/31/2021 entered into the comparable EmpowerDB was analyzed. Within the report period, 299 total persons were served.

- 73 percent of the clients were adults (age 18 or over) and remaining 27 percent children.
- In total, 14 persons met the definition of chronically homeless, 3 Veterans, and 31 youth under age 25.
- Of the 218 adults served, nearly all (83 percent) are female, 8 percent are male, and 4 percent are gender non-binary or transgender.
- Of the 81 children served, 51 percent are female, and 49 percent are male. Of the 218 adults served, 92 percent are under the age of 55 years.

Across the total 299 clients served, 45 percent of clients identified as Black, African American, or African, 4 percent identified as Asian or Asian American, and 1 percent identified as American Indian, Alaska Native, or Indigenous, and 50 percent identified as White. Of total clients served, 22 percent identified as Hispanic or Latin(a)(o)(x). Within the program, the highest reported health conditions were Mental Health Disorders and Physical Disabilities with at least 15 clients suffering from the conditions. Of the 218 total adults served by the program, 45 percent entered the program with no income at program start.

Albany Victim Service Provider's comparable database (EmpowerDB utilized by Equinox, Inc. for Project Breakfree and Equinox DV Shelter) reported 418 clients residing in emergency shelter or transitional housing programs during the previous calendar year (January 2020 – December 2021). Of these 418 clients, 106 clients resided in Transitional Housing programs and 312 in Emergency Shelter programs. The below are key findings on these 418 clients fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking:

#### Equinox's Project Break Free and Domestic Violence Shelter

- Of the 279 adult clients, 91 percent are female, 7 percent are male, and 2 percent are Transgender.
- Of the 139 child clients, nearly two-thirds (62 percent) are male, and 37 percent are female.
- The representation of Black, African American, or African clients in this group (56 percent) is nearly double

the demographic's representation in the general population (29%).

- Ten percent of clients are Hispanic/Latin(a)(o)(x) (likely an undercount due to missing data for this data element).
- Five percent of all clients have at least one physical or mental health condition, but this value may be underreported due to missing or incomplete data for this data element.
- Six percent of all clients served are chronically homeless.
- Ten percent of clients (heads of households) are youth under age 25.

**d. 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**

- (1) Households who have previously been qualified as 'homeless' and are currently housed due to temporary or emergency assistance, including financial assistance, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness:

While there is no existing quantitative data source to measure the number of households that would meet these criteria, CoC Coordinated Entry (CE) Program leadership reported most households that would fall into this category (i.e. households that are supported with time-limited CoC Rapid Rehousing assistance) are able to transition to stable housing and self-sustain, or are connected through Coordinated Entry to Permanent Supportive Housing. While we are unable to provide statistics on this category of households, CE Lead agencies report the pool of households that fall into this category who would need assistance through HOME-ARP is extremely small.

- (2) Households at greatest risk of housing instability because the household:

- a. has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs):

According to 2015-2019 Comprehensive Housing Affordability Strategy (CHAS) data (the most recent available), 20,050 households in Albany County earn less than 30% area median income and are severely cost burdened by rent. Of these households, 15,895 are renters and 4,155 are homeowners. In Rensselaer County, 9,150 households earn less than 30% area median income with 6,650 renters and 2,500 owners. In Schenectady County, there are 8,760 households earning less than 30% area median income with about three-quarters (6,230) of the households comprised of Renters and 2,530 owners. While demographic data is unavailable through CHAS, using available poverty and homeless data, available evidence indicates that this population is disproportionately people of color and Hispanic/Latin(a)(o)(x).

- b. has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the conditions from paragraph (iii) of the "At risk of homelessness" definition established at 24 CFR 91.5:

The following are key findings about the at risk of homelessness clients on the Coordinated Entry List for prevention assistance between October 1<sup>st</sup>, 2020 (the start of the CE prevention program) and June 7<sup>th</sup>, 2022. It should be noted that until January 15, 2022, there was an eviction moratorium in place in New York State, and thus the total numbers of those presenting as at-risk of homelessness are likely much lower than the actual number. The CoC expects a significant increase in persons presenting for eviction prevention services, with the moratorium no longer in place,

over the coming year. Across all three communities, approximately one third of those on the Coordinated Entry List for prevention assistance reported between 30-50% AMI, meeting HOME-ARP's definition of 'other populations' eligible for assistance.

Schenectady County (which contains the City of Schenectady): 184 clients on the Coordinated Entry list for prevention assistance

- 66 percent of clients are Female heads of households.
- Black, African American, or African clients' representation (53 percent of 184 clients) is more than double their representation in the general population (20%).
- 40% of households report a disabling condition.
- 34% of households report being between 30-50% AMI.

Rensselaer County (which contains the City of Troy): 69 clients on the Coordinated Entry list for prevention assistance

- 74 percent of clients are Female heads of households.
- Black, African American, or African clients' representation (74 percent of 69 clients) is significantly higher their representation in the general population (17%).
- 39% of households report a disabling condition.
- 35% of households report being between 30-50% AMI.

Albany County: 109 clients on the Coordinated Entry list for prevention assistance. **Please note, as data for only the Town of Colonie is unavailable, the below data on Albany County is being provided. This data largely represents persons from the city of Albany; the Town of Colonie likely represents a very small portion of those represented below.**

- 73 percent of clients are Female heads of households.
- Black, African American, or African clients' representation (72 percent of 109 clients) is more than double their representation in the general population (29%).
- 40% of households report a disabling condition.
- 34% of households report being between 30-50% AMI.
- 6 percent of households are youth ages 18-24.

Another data source to assess the need for prevention services using HOME-ARP funds is a review of the NYS Emergency Rental Assistance Program (ERAP) data. As of November 1, 2022, 2,460 ERAP Rent Arrears applications were submitted for Schenectady County; 2,272 for Rensselaer County; and 5,491 for Albany County. In Schenectady County, 1,438 Rent Arrears payments with ERAP funds were made averaging \$6,490 per household; in Rensselaer County, 1,289 Rent Arrears payments were made averaging \$6,367 per household; and in Albany County, 3,048 Rent Arrears payments were made averaging \$5,807 per household.<sup>5</sup> Per NYS's report on ERAP Applicant Demographics<sup>6</sup>, 24% of applicants outside of New York City (Schenectady, Rensselaer, and Albany Counties in this grouping) were between 30% and 50% of AMI. The report also showed the majority of households applying for ERAP outside of NYC are female (65%), Non-Hispanic/Latin(a)(o)(x), and disproportionately Black or African-American (36%).

Utilizing this information, we can inference there is a potential ongoing need for \$6 million in rental arrear payment

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<sup>5</sup> NYS OTDA ERAP, [County by Zip Code ERAP Application Counts, Through Nov 1, 2022](#)

<sup>6</sup> NYS OTDA ERAP, [ERAP Application Demographics, Through June 6, 2022](#)

support to prevent evictions across the PJ's area among those at 30-50% AMI. While this is an extremely rough estimate, it shows the magnitude of ongoing need now that the eviction moratoria have lifted.

County	Rental Arrear Applications	Rent Arrear Applications Paid	Estimated Rent Arrear Applications Pending	Estimated Rent Arrear Applications pending for households earning 30-50% AMI	Average Rent Arrear Payment	Estimated ongoing Rent Arrear Payment Need
Schenectady	2,460	1,438	1,022	245	\$6,490	<b>\$1,590,050</b>
Rensselaer	2,272	1,289	983	235	\$6,367	<b>\$1,496,245</b>
Albany*	5,491	3,048	2,443	586	\$5,807	<b>\$3,402,902</b>
Total:	10,223	5,775	4,448	1,066		<b>\$6,489,197</b>

**\* Please note, as data for only the Town of Colonie is unavailable, this data on Albany County is being provided. This data largely represents persons from the city of Albany; the Town of Colonie likely represents a very small portion of those represented above.**

**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):**

According to the 2021 Housing Inventory Count (HIC) data, in the Schenectady County CoC (NY-507), there are 11 Emergency Shelters, 14 Permanent Supportive Housing programs, 3 Rapid Rehousing programs, and 6 Transitional housing programs in the CoC. In the Rensselaer County CoC (NY-512), there are 6 Emergency Shelters, 15 Permanent Supportive Housing programs, 5 Rapid Rehousing programs, and 4 Transitional housing programs in the CoC. In the Albany County CoC (NY-503), there are 16 Emergency Shelters, 34 Permanent Supportive Housing Programs, 11 Rapid Rehousing Programs, and 10 Transitional housing programs.

**Congregate and Non-congregate Shelter Units**

Within the Emergency Shelter programs, Schenectady/NY-507, has a total of 242 shelter beds with 171 Facility-based beds, 58 Voucher beds, and 13 other beds. In Rensselaer/NY-512, there are 134 total shelter beds with 112 Facility-based beds, 15 Voucher beds, and 7 other beds. In Albany/NY-503, there are 826 total beds with 584 Facility-based beds and 36 Voucher Beds.

**Supportive Services**

According to the FY2021 Grant Inventory Worksheet (GIW) published by HUD<sup>7</sup>, the Schenectady City & County CoC (NY-507), with most programs located in the City of Schenectady, received \$96,425 to fund two Supportive Services Only programs. In addition to this funding, supportive services were funded in 10 housing programs for a total of \$574,005 to provide housing case management. In sum, the 12 supportive services programs received \$670,430 (or approximately \$37,000 per program). Across the total GIW funding allocation of \$4,496,736 and 18 programs, nearly half of the funding (\$1,925,100 or 43%) was allocated to rental assistance, 15 percent toward supportive services, and 19 percent to leasing. Through NYS's Emergency Rental Assistance Program (ERAP), as

<sup>7</sup> HUD Continuum of Care Grant Inventory Worksheets, [NY-507](#)

of November 2022 an additional \$9.3 million was provided in rental arrears/payments to Schenectady County residents<sup>8</sup> - a rent relief program that is not expected to renew for the community.

According to the FY2021 Grant Inventory Worksheet (GIW) published by HUD<sup>9</sup>, the Troy City & Rensselaer County CoC (NY-512), with most programs located in the City of Troy, received \$86,354 to fund two Supportive Services Only programs. In addition to the funding allocated to Supportive Services Only programs, supportive services were funded in 11 other programs for a total of \$681,004 to provide case management to those in CoC housing programs. Between the 12 programs receiving funding to provide supportive services, the total amount towards supportive services was \$767,358 or approximately \$59,000 per program allocated. Across the total GIW funding allocation of \$3,680,001 and 13 programs, more than half of the funding (\$2,316,456) or 63% was allocated to rental assistance, 21 percent toward supportive services, and 8 percent to leasing. Through NYS's Emergency Rental Assistance Program (ERAP), as of November 2022 an additional \$8.2 million has been provided in rental arrears/payments to Rensselaer County residents<sup>10</sup> - a rent relief program that is not expected to renew for the community.

According to the FY2021 Grant Inventory Worksheet (GIW) published by the U.S. Department of Housing and Urban Development (HUD)<sup>11</sup>, the Albany City & County CoC (NY-503), with most programs located in the City of Albany, received \$109,405 to fund two Supportive Services Only programs. In addition to this funding, supportive services were funded within 18 housing programs for a total of \$822,447 to provide housing case management. In sum, these 20 supportive services programs received a total of \$924,451 (or approximately \$46,000 per program). Across the total GIW funding allocation of \$5,876,436 and 28 programs, half of the funding (\$2,917,800 or 50%) was allocated to rental assistance, 16 percent to supportive services, and 17 percent to leasing. Through NYS's Emergency Rental Assistance Program (ERAP), as of June 2022 an additional \$18 million was provided in rental arrears/payments to Albany County residents<sup>12</sup> - a rent relief program that is not expected to renew for the community.

This supportive services funding is complemented by over \$971,000 in Schenectady, \$406,000 in Troy, and \$800,000 in Albany of prevention funds across other funding streams such as Emergency Solutions Grants and Community Development Block Grants. Unfortunately, the bulk of this prevention funding was a one-time allocation (not recurring) through the coronavirus relief programs - ESG-CV and CDBG-CV.

### **Tenant Based Rental Assistance (TBRA)**

According to the 2021 Housing Inventory Count (HIC) data, Schenectady County (NY-507) has 360 tenant based beds (Permanent Supportive Housing or Rapid Rehousing), Rensselaer County (NY-512) has 283, and Albany County (NY-503) has 874. In each of these communities, 99 percent were occupied during the Point in Time count. According to HUD's 'Picture of Subsidized Households'<sup>13</sup> in Rensselaer County, housing authorities provide 2,490 Housing Choice Vouchers (76% utilized) and in Schenectady County housing authorities provide 2,016 Housing Choice Vouchers (88% utilized). Albany Housing Authority (AHA) provides 2,200 Housing Choice vouchers in the City of Albany – all of which are regularly at capacity. The current waitlist for AHA housing includes 13,241 people<sup>14</sup>, or 13% of the City of Albany population. Schenectady Municipal Housing Authority (SMHA) reported

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<sup>8</sup> NYS OTDA ERAP, [County by Zip Code ERAP Application Counts, Through June 5, 2022](#)

<sup>9</sup> HUD Continuum of Care [Grant Inventory Worksheets](#), NY-512

<sup>10</sup> NYS OTDA ERAP, [County by Zip Code ERAP Application Counts, Through June 5, 2022](#)

<sup>11</sup> HUD Continuum of Care Grant Inventory Worksheet, [NY-503](#)

<sup>12</sup> NYS OTDA ERAP, [County by Zip Code ERAP Application Counts, Through June 5, 2022](#)

<sup>13</sup> <https://www.huduser.gov/portal/datasets/assths.html>

<sup>14</sup> Albany Housing Authority survey response as part of the HOME-ARP stakeholder feedback process



their waitlist consists of 7,300 applicants, of which, 4,200 have a City of Schenectady address. It was reported by local housing authorities and stakeholders during the HOME-ARP outreach process that vouchers are currently underutilized as there is limited housing stock with which to utilize the vouchers, showing a need for additional permanent, quality housing at or below market rate.

### **Affordable Housing**

According to the City of Albany Subsidized Housing Report produced by the Albany Housing Authority, data collected during the Spring of 2017 showed that when excluding Veteran Affairs Supportive Housing (VASH) vouchers and Continuum of Care rental assistance, the City of Albany had 3,113 units of subsidized housing. Data from the Census's 2020: ACS 5-Year Estimates Detailed Table states there are more than 48,000 rental units in the City of Albany, however nearly 6,000 of those are vacant. Based on those estimates, less than 8 percent of units in the City of Albany are subsidized units.  $(48,000 - 6,000 = 42,000 \text{ total units}; 3,113 \text{ affordable units} / 42,000 \text{ total} = 8\%)$ . According to HUD's 'Picture of Subsidized Households'<sup>15</sup> in Rensselaer County, housing authorities provide 1,042 project-based units (93% utilized) and in Schenectady County housing authorities provide 1,643 project based units (89% utilized). Albany Housing Authority (AHA) also owns and operates 1,800 Units in the City of Albany – all of which are regularly at capacity. High utilization rates across the region's PSH and public housing authority site-based units show an ongoing need for affordable housing development.

According to the 2021 Housing Inventory Count (HIC), Schenectady County boasts 14 Permanent Supportive Housing (PSH) programs with 469 beds. Six (6) of these programs providing 129 beds, are site-based. In Rensselaer County, the community maintains 15 Permanent Supportive Housing (PSH) programs with 655 beds. Five (5) of these programs providing 165 beds, are site-based. According to the 2021 Housing Inventory Count (HIC), Albany County boasts 34 Permanent Supportive Housing (PSH) programs, including 826 beds. Fifteen (15) of these programs, providing 222 beds, are site-based; and 19 of these programs providing 604 beds, are tenant based, requiring identifying an affordable unit in the community to utilize the provided rental assistance.

### **Describe the unmet housing and service needs of qualifying populations:**

#### **a. Homeless as defined in 24 CFR 91.5**

The primary unmet needs for the homeless population that the community identified as a priority for funding are: affordable rental housing development (housing); tenant based rental assistance – and specifically, security deposits (housing); non-congregate shelter; and supportive services such as shelter/housing staff training on items such as de-escalation, mobile mental health crisis services, and a landlord navigator position. 37% (9 out of 24) stakeholder respondents and 57% (28 out of 49) public survey respondents recommended prioritizing the homeless qualifying population for HOME-ARP funding over other qualifying populations.

Data analysis indicates an unmet housing need for persons experiencing homelessness within the PJ's localities. Specifically, within each locality the homeless system (emergency shelter, transitional housing, rapid rehousing, and permanent supportive housing) is at full capacity (Table 1 below); the average length of time homeless is at least 86 days (Table 2 below); and less than 36% of households exit from shelter to permanent destinations (Table 3). These data together build the case that there is a need for more affordable and/or permanent supportive housing and rental assistance to serve those experiencing homelessness.

**\*Please note, as data for only the Town of Colonie is unavailable, the below data on Albany County is being provided. This data largely represents persons from the city of Albany; the Town of Colonie likely represents**

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<sup>15</sup> <https://www.huduser.gov/portal/datasets/assthsg.html>



a very small portion of those represented below. However, this data exemplifies the need to address homelessness across the region.

The Current System is at Full Capacity  
As noted in the table below, the homeless sheltering/housing system in Albany, Schenectady, and Rensselaer Counties are at full capacity, ranging between 90% and 100% of beds filled at any given time. This data point shows more units of affordable rental housing, and more units of supportive housing (95% units filled regionally) are needed to reduce persons living in shelter and transitional housing.

Table 1:

SUPPLY:  
REGIONALLY,  
THE HOMELESS  
SYSTEM IS  
NEARLY AT  
FULL CAPACITY

CoC/Project Type	Point in Time Count	Total Beds	Utilization Rate
NY-503 (ACCH)	1749	1839	95%
ES	136	151	90%
TH	278	278	100%
RRH	797	826	96%
PSH	538	584	92%
NY-507 (HSPB)	739	795	93%
ES	189	242	78%
TH	57	57	100%
RRH	27	27	100%
PSH	466	469	99%
NY-512 (RCHSC)	906	928	98%
ES	130	134	97%
TH	28	34	82%
RRH	105	105	100%
PSH	643	655	98%
Region	4930	5208	95%
ES	455	527	86%
TH	363	369	98%
RRH	2465	2604	95%
PSH	1647	1708	96%




Current Bed Utilization by Community and Program Type  
Source: 2021 Housing Inventory Chart (HIC) and Point in Time (PIT) Count



High Average Number of Homeless Days  
According to the Longitudinal Systems Analysis (LSA) data for the most recent HUD fiscal year, the average number of days homeless ranged between 86 and 106 days across the three communities. For households with adults and children, the average length was higher, ranging from 100 to 143 days. Homelessness takes on average three months to solve in the communities due to lack of affordable/supportive housing resources. Therefore, by increasing the number of affordable rental and supportive housing units and rental assistance, community and governmental organizations can reduce the length of time that clients are homeless. As a point of comparison, per the CoC Interim Rule (578.71), High Performing Communities have average lengths of time homeless of less than 20 days outperforming our communities by 66 days (at its best for singles) and 80 days (at its best for families).

Table 2:

## NEED FOR HOUSING FOR PERSONS EXPERIENCING HOMELESSNESS: AVERAGE DAYS HOMELESS

Average Days Homeless					
	Overall	Adult Only	Family	Child Only	
<b>NY-503 (ACCH)</b>					
Days Homeless	<b>90</b>	90	<b>100</b>	35	
Households	<b>1,252</b>	1,014	195	35	
<b>NY-507 (HSPB)</b>					
Days Homeless	<b>106</b>	108	<b>120</b>	11	
Households	<b>893</b>	766	83	41	
<b>NY-512 (RCHSC)</b>					
Days Homeless	<b>86</b>	74	<b>143</b>	1	
Households	<b>474</b>	388	85	1	

Source: HDX2's Stella P Module using data from the  
Longitudinal Systems Analysis (LSA) from CCHMIS (10/01/2020 – 09/30/2021)



### Low Percentage of Exits to Permanent Destinations

Table 3 below shows that regionally less than one-third of households who exited a shelter or emergency housing moved onto a permanent housing destination. This low percentage again exemplifies the need for affordable rental housing development and rental assistance to solve homelessness.

Table 3:

### NEED FOR HOUSING FOR PERSONS EXPERIENCING HOMELESSNESS: EXITS TO PERMANENT DESTINATIONS

Community	Total Households	Total Households- Exit to Permanent Destinations
NY-503 (ACCH)	990	28%
NY-507 (HSPB)	693	35%
NY-512 (RCHSC)	360	36%
Region	2,043	32%

Source: HDX2's Stella P Module using data from the  
Longitudinal Systems Analysis (LSA) from CCHMIS (10/01/2020 – 09/30/2021)



Multiple stakeholders also reported during the stakeholder forum and survey a need to develop affordable rental housing to solve homelessness, as homeless clients with rental subsidies/vouchers in hand have been unable to find affordable units and thus remain homeless for longer periods of time.

#### *Persons with Severe and Persistent Mental Illness*

A specific supportive service need for the homeless population is mental health services. During stakeholder forums and one-on-one meetings, partners anecdotally reported an increase in (1) the number of clients experiencing mental health issues and (2) the severity of mental illness experienced by clients experiencing homelessness. There is a gap in providing necessary mental health support to clients experiencing homelessness, as local shelters are not staffed or funded to provide intensive mental health services, and homeless service providers reported a shortage in local mental health services. This has resulted, at times, in dangerous situations for both clients and staff at drop-in centers, shelters, and permanent housing locations. Similarly, when asked in the stakeholder and public surveys if funding should be targeted to any of thirteen subpopulations, persons with mental illness was identified most frequently by stakeholders (22 out of 24 respondents, or 92%) and second most frequently by the public (33 of 49 respondents, or 67%). Data from the HMIS supports this need, with the most frequent health condition experienced by clients across the region being a mental health disorder.

Table 5:

## THE 3 MOST FREQUENT HEALTH CONDITIONS: MENTAL HEALTH, CHRONIC HEALTH, & PHYSICAL DISABILITY

Health Conditions At Start - All Consumers	NY-503	NY-507	NY-512	Total
Mental Health Disorder	2176	1360	901	<b>4437</b>
Chronic Health Condition	1534	813	536	<b>2883</b>
Physical Disability	1277	715	413	<b>2405</b>
Drug Use Disorder	464	269	179	<b>912</b>
Developmental Disability	438	289	177	<b>904</b>
Both Alcohol and Drug Use Disorder	421	315	136	<b>872</b>
Alcohol Use Disorder	406	195	154	<b>755</b>
HIV/AIDS	195	33	26	<b>254</b>

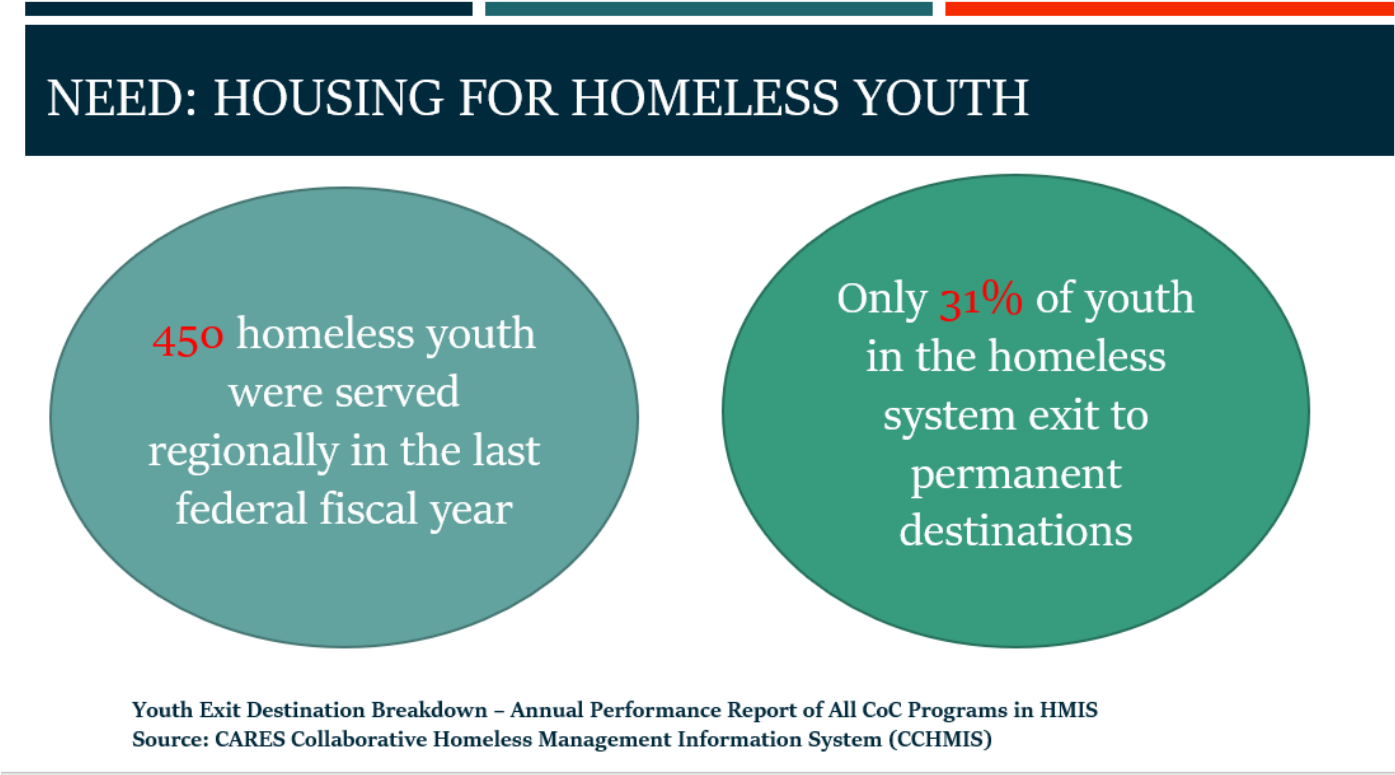
Chronic Health Condition Breakdown – Annual Performance Report of All CE Programs in HMIS  
Source: CARES Collaborative Homeless Management Information System (CCHMIS)



Homeless Youth

Another specific subpopulation identified by stakeholders is homeless youth (24 years old and younger). Stakeholders in the city of Troy reported there are no homeless-youth specific services or housing programs in the city. Moreover, while there were 450 youth that experienced homelessness in the last federal fiscal year, there are only 28 beds dedicated to homeless youth regionally according to the 2021 Housing Inventory Chart.

Table 6:

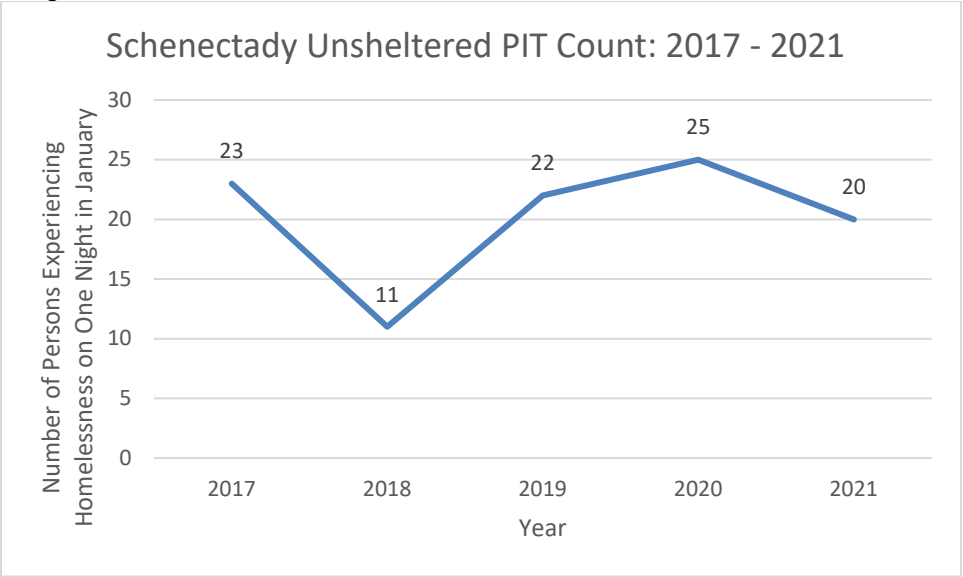


Persons Experiencing Unsheltered Homelessness

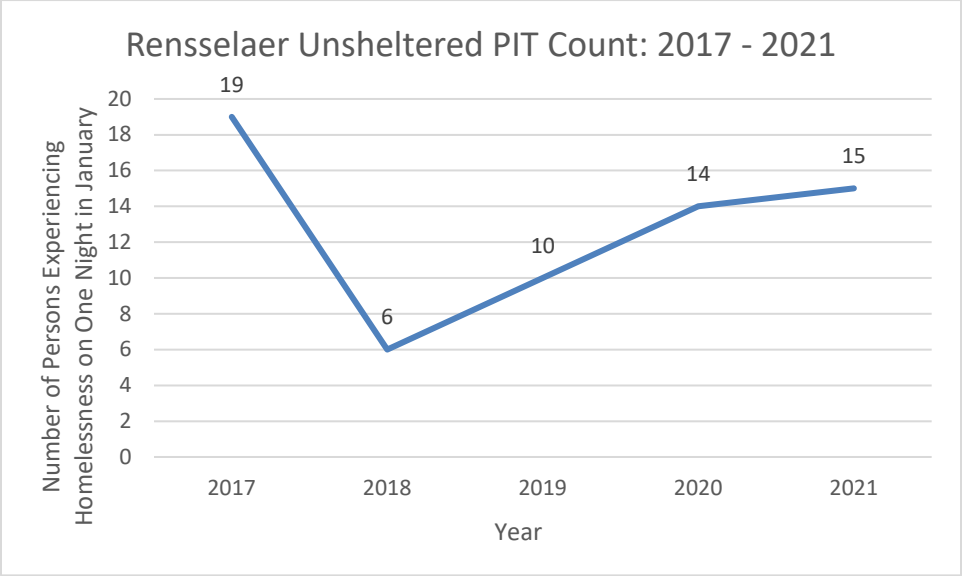
According to Point in Time (PIT) data<sup>16</sup>, over the past five years (2017 – 2021), the number of persons experiencing unsheltered homelessness has remained largely stagnant in Schenectady and Rensselaer Counties (averaging 20 and 13 persons, respectively), and has increased greatly in Albany County (from 25 persons in 2017 to 49 persons in 2021). Public survey responses supported targeting HOME-ARP funds to this population. Specifically, twenty-eight (28) out of forty-nine (49) respondents of the public survey reported the need to target resources for persons experiencing unsheltered homelessness out of thirteen subpopulations. Unmet needs for this population include supportive services (including mental health services), non-congregate shelter, and permanent supportive housing.

<sup>16</sup> Unsheltered Point in Time data from HDX, <https://caresny.org/continuum-of-care/reports/>

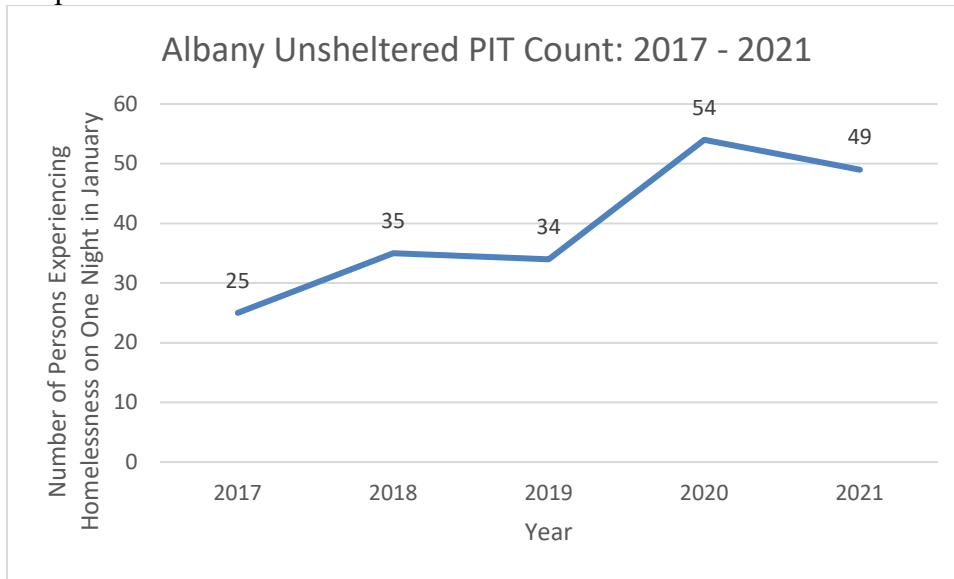
Graph 1:



Graph 2:



Graph 3:



#### **b. At Risk of Homelessness as defined in 24 CFR 91.5**

The primary unmet need for the at-risk of homelessness population that the community identified as a priority for funding is the lack of affordable rental housing to match with clients holding vouchers that are ready to rent.

One data point to guestimate the at-risk of homelessness population's unmet housing and service needs is by looking at NYS Emergency Rental Assistance Program (ERAP) data. Per this data, we can assume there are at least 2,669 households in Schenectady, Rensselaer, and Albany Counties that are currently at-risk of homelessness that are below 30% AMI and have yet to be served<sup>17</sup>. This translates to an immediate need for \$16 million<sup>18</sup> in rental arrears to prevent imminent evictions. That being said, stakeholders argued that (1) HOME-ARP funds are too limited to make a meaningful difference in this need (eviction prevention), (2) unfortunately, many of these households may become homeless before assistance can be provided, and (3) additional funds from the state are being provided for rental arrears. As such, it was recommended to focus HOME-ARP funds to develop additional affordable rental housing units to address risk of homelessness instead of investing in eviction prevention for low-income households to prevent evictions to homelessness.

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

When asked in the stakeholder and public surveys if funding should be targeted to any of the thirteen subpopulations, the subpopulation of victims/survivors of domestic violence, dating violence, sexual assault, stalking or human trafficking was identified second most frequently by stakeholders (17 out of 24 respondents, or 71%) and most frequently by the public (35 of 49 respondents, or 71%). The primary unmet needs for those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking which the community identified as a priority for funding are: tenant based rental assistance - specifically security deposits (housing); affordable rental housing development (housing); and mental health services (services).

There below is a current list of permanent housing projects dedicated to serving victims of domestic violence in the

<sup>17</sup> See *Describe the size and demographic composition of qualifying populations within the PJ's boundaries, At Risk of Homelessness* section.

<sup>18</sup> NYS OTDA ERAP, [County ERAP Payments, Through June 6, 2022](#)

three-county area:

- YWCA of Northeastern NY in Schenectady hosts one (1) five-bed Rapid Rehousing (RRH) project. While they currently have two other RRH projects dedicated to victims of domestic violence, the funding for these projects will end in 2023.
- The Community Builders in Troy hosts a 39 bed Permanent Supportive Housing (PSH) project.
- Unity House of Troy hosts 93 beds in PSH projects and 27 beds in RRH projects.
- Equinox in Albany hosts a 73 bed RRH project.

The total number of permanent housing beds currently available across the three counties to house survivors of domestic violence equates to 237 beds. In the data provided from local Victim Service Providers' comparable databases, 714 clients were in Emergency Shelter programs for those fleeing domestic violence in 2021. This presents an unmet need of approximately 477 homeless clients who have experienced domestic violence in need of housing ( $714 - 237 = 477$ ).

**d. 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**

Those falling into the 'other populations' categories were ranked last for targeting HOME-ARP funding by stakeholder and public survey respondents. The stakeholders identified a need for: tenant based rental assistance (housing) and affordable rental housing development (housing) to support the category of other populations.

- (1) Households who have previously been qualified as 'homeless' and are currently housed through temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

While there is no existing quantitative data source to measure the number of households who would meet these criteria, CoC Coordinated Entry leadership has reported that most of those households that would fall into this category (i.e. households that are supported with time-limited CoC Rapid Rehousing assistance) are able to transition to stable housing and self-sustain, or are connected through Coordinated Entry to Permanent Supportive Housing. As such, we believe the unmet need for this population (both housing and services) is minimal compared to other vulnerable populations.

- (2) Households at greatest risk of housing instability because the household:
  - a. has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs); or

According to 2014-2018 CHAS data (the most recent available), across the three-county region there are 28,775 households renting who earn less than 30% of area median income and determined to be severely rent cost-burdened. Of these 28,775 households 6,230 rent in Schenectady County, 6,650 rent in Rensselaer County, and 15,895 rent in Albany County. This data illustrates the need for additional affordable rental housing and rental assistance in the community (arguably, enough to support these 28,775 households), and staff support to navigate the affordable housing system.

- b. has annual income that is less than or equal to 50% of the area median income, as determined by



HUD, AND meets one of the conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5

Of Coordinated Entry prevention assessments conducted between October 2020 and June 2022, 362 households, approximately one-third of the total, applied for prevention assistance and reported earning between 30% and 50% AMI. The NYS Emergency Rental Assistance Program (ERAP) data reveals at least 1,066 households in Schenectady, Rensselaer, and Albany Counties are defined as at-risk of homelessness and living between 30% and 50% AMI<sup>19</sup>. This number demonstrates the continued need for rental arrear payments to prevent evictions for at least these 1,066 households with a dollar value of approximately \$6.4 million.<sup>20</sup> In the long term, additional affordable rental housing development is necessary to prevent ongoing risk of homelessness for households living below 50% AMI in the region.

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

Based on the data described above regarding qualifying population demographics, current resources, and unmet housing and service needs of qualifying populations, the primary gaps within the current shelter, housing inventory, and delivery system are clear:

- 1) Non-congregate shelter – of which there are limited beds in the PJ localities - is an essential option for the increasing population of persons experiencing unsheltered homelessness who frequently are resistant to entering congregate shelters due to perceived lack of safety, severe mental illness, etc. Moreover, non-congregate shelter may address the ongoing need to ensure safe emergency housing options for persons who are transgender, persons experiencing severe mental illness, and to reduce the spread of COVID-19 and other communicable diseases. Non-congregate shelter options are incredibly successful for emergency housing according to a 2020 report published by the University of Washington and the King County Department of Community and Human Services. These researchers found clients in the non-congregate motels and hotels had greater sense of stability, increased feelings of privacy and belonging, and reduction of interpersonal conflict in a safe location that could be accessed 24/7. These benefits resulting from more private settings led to a reduction in premature program exits and returns to homelessness, increased engagement with program services, and better outcomes for the clients. Since the unsheltered population typically has greater housing and health needs compared to the sheltered homeless population, non-congregate shelter is the priority need for this population. Currently, most non-congregate shelters in the area focus on serving victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking, leaving a gap in non-congregate shelter options for other populations experiencing homelessness. Specifically, stakeholders reported a need for non-congregate shelter for families, singles, and youth to meet current gaps in services for these subpopulations.
- 2) Tenant Based Rental Assistance (TBRA) is needed for the 522 households on the CoCs’ Coordinated Entry priority list (270 households in Schenectady County, 52 in Rensselaer County, 200 in Albany County<sup>21</sup>) and the 714 clients residing in Domestic Violence Shelters<sup>22</sup>. There is an

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<sup>19</sup> See *Describe the size and demographic composition of qualifying populations within the PJ’s boundaries, Other Populations* section.

<sup>20</sup> NYS OTDA ERAP, [County ERAP Payments, Through June 6, 2022](#) – Average payment in Schenectady County - \$6,490; Rensselaer County - \$6,367; Albany County - \$7,845.

<sup>21</sup> Pulled from Coordinated Entry Projects in HMIS as of 12/12/2022

<sup>22</sup> Calculated from 2021 APRs for local Domestic Violence shelters.

additional need for TBRA for the 28,775 households in the three-county area reported to earn less than 30% AMI and are severely rent cost-burdened<sup>23</sup>. Stakeholders identified a priority need for security deposits from the TBRA program due to the documented lack of security deposits as a barrier in securing leases for apartments – even with rental assistance in hand.

- 3) Affordable rental housing development is also arguably necessary for the 522 households on the CoCs' Coordinated Entry priority list (270 households in Schenectady County, 52 in Rensselaer County, 200 in Albany County<sup>24</sup>) and the 714 clients in Domestic Violence Shelters<sup>25</sup>. The gap in affordable rental housing is also exemplified by the 28,775 households in the three-county region who earn less than 30% AMI and are severely rent cost-burdened<sup>26</sup>. This statistic proves that the lack of affordable housing is a leading cause of homelessness in the community. Anecdotal information gathered from homeless housing providers reveals their clients have been unable to find affordable rental units with their subsidy/voucher. This is another data point reinforcing the gap between the current supply of affordable rental units compared to the demand/need for them.
- 4) There is a substantial gap in eviction prevention resources for at risk of homeless households. Per NYS Emergency Rental Assistance Program (ERAP) data, we guesstimate there are at least 2,669 households in the three-county area who are currently at-risk of homelessness, living below 30% AMI and have yet to be served<sup>27</sup>; and at least 1,066 households currently at-risk of homelessness and living between 30% and 50% AMI<sup>28</sup>. This results in a gap of funding for a total of 3,735 households (2,669 + 1,066 = 3,735) in immediate need of collectively over \$22.7 million<sup>29</sup> to prevent eviction and entering the homeless service system.

The data (both quantitative and anecdotal) also shows a supportive services program gap in terms of serving persons experiencing severe mental illness. Mental illness is the most prevalent disabling condition amongst those experiencing homelessness per local CoC data, and stakeholders have anecdotally reported an increase in the severity of mental health needs among clients served. This increased acuity has created a significant gap in services needed with local capacity as well as the inability of the homeless service providers to provide necessary case management to clients on site with severe mental illness. Stakeholders strongly recommended allocating HOME-ARP funding to bridge this gap in need and availability.

Stakeholders also reported the need for ongoing trainings for staff in order to better serve and meet the unique needs of the qualifying populations. Training topics noted were Diversity, Equity, and Inclusion, de-escalation techniques when working with clients, and active-shooter training.

Finally, some stakeholders supported the need for a community wide landlord navigator who would build relationships with landlords in order to create one, centralized list of available, affordable rental

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<sup>23</sup> 2014-2018 CHAS data (the most recent available)

<sup>24</sup> Pulled from Coordinated Entry Projects in HMIS as of 12/12/2022

<sup>25</sup> Calculated from 2021 APRs for local Domestic Violence shelters.

<sup>26</sup> 2014-2018 CHAS data (the most recent available)

<sup>27</sup> See *Describe the size and demographic composition of qualifying populations within the PJ's boundaries, At Risk of Homelessness* section.

<sup>28</sup> See *Describe the size and demographic composition of qualifying populations within the PJ's boundaries, Other Populations* section.

<sup>29</sup> NYS OTDA ERAP, [County ERAP Payments, Through June 6, 2022](#) – Average payment in Schenectady County - \$6,490; Rensselaer County - \$6,367; Albany County - \$7,845.

units, to build trust with landlords in order to rent to tenants with a subsidy, and be a point of immediate contact for tenant questions or problems if case management is not available.

*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:*

N/A

***Identify priority needs for qualifying populations:***

While the quantified value of the housing and supportive services needed for the qualifying populations well exceeds the HOME-ARP funding available, the community prioritized the most important activities with varying funding amounts. These needs, summarized below, reflect stakeholder and public survey results, and incorporate the specific needs identified through data analysis and stakeholder and public input on both qualifying populations and any subpopulations for focus.

**Homeless as defined in 24 CFR 91.5**

The two primary needs identified for the homeless population in the PJ area are 1) affordable rental housing development – to potentially utilize in conjunction with rental assistance/vouchers; 2) increased funding for intensive mental health services (supportive services); 3) additional rental assistance for security deposits (TBRA); and 4) Non-congregate shelter development.

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

The long-term need for the at-risk of homelessness population is affordable rental housing development. While there is an extensive need for eviction prevention funding as well, the latter need far surpasses the funding available through HOME-ARP, and thus stakeholders (per surveys and the forum) expressed HOME-ARP resources should be targeted to other activities that will truly move the needle in solving homelessness and housing instability.

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

The primary needs for persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking are 1) affordable rental housing development – to potentially utilize in conjunction with rental assistance/vouchers; 2) increased funding for intensive mental health services (supportive services); and 3) additional rental assistance for security deposits (TBRA).

**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**

As confirmed by Coordinated Entry Program leadership, there is limited need for households who previously qualified as ‘homeless’ and are currently housed with temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness.

For households at greatest risk of housing instability due to annual income less than or equal to 30% of the area median income and being severely rent cost-burdened (i.e., paying more than 50% of monthly household income toward rent), there is a need for additional tenant based rental assistance and affordable rental housing development to help these vulnerable households remain housed. However, stakeholders (per surveys and the forum) expressed

HOME-ARP resources should be prioritized only to homeless households not these unstably housed households given the limited HOME ARP resources.

For households who have an annual income less than or equal to 50% of the area median income, as determined by HUD, AND meet one of the conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5, the greatest need as evident by NYS ERAP data noted above (i.e. \$6.4 million in pending back-rent applications) is eviction prevention resources. As noted above, the financial need for the total prevention assistance surpasses the funding available through HOME-ARP, and thus stakeholders (per surveys and the forum) expressed HOME-ARP resources should be targeted to other activities that will truly move the needle in solving homelessness and housing instability.

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

Data Sources

Data was collected from the following public and private sources:

- CARES Collaborative Homeless Management Information System (CCHMIS)
  - Annual Performance Reports (APR)
  - System Performance Measures (SPM) Report
  - Report Builder Database Queries
- Comparable HMIS databases (e.g., EmpowerDB)\_
- Stella P Module of HDX2 from submitted Longitudinal Systems Analysis (LSA) data
- Annual Performance Report (APR) and Consolidated Annual Performance and Evaluation Report (CAPER) data from the Empower Database of Albany’s Victim Service Provider Agency (Equinox)
- Housing and Urban Development (HUD)
  - Grant Inventory Worksheet (GIW)
  - Housing Inventory Count (HIC) Reports
  - Point-in-Time Count (PIT) Reports
  - Comprehensive Housing Affordability Strategy (CHAS)
- United States Census Bureau
  - Decennial Census
  - American Community Survey
- Data from the Housing Authorities
  - Schenectady Municipal Housing Authority – interview
  - Troy Housing Authority – interview
  - City of Albany Subsidized Housing Report produced by Albany Housing Authority, 2017
- NYS Emergency Rental Assistance Program (ERAP)
- BBC Research and Consulting
  - ReZone Albany Housing Study - Housing Market Review: City of Albany
- Center for Disease Control (CDC)
  - National Intimate Partner and Sexual Violence Survey
  - Life Expectancy by Census Tract Estimates
- University of Washington
  - Impact of Hotels as Non-Congregate Emergency Shelters
- UCLA Williams Institute School of Law
  - Victimization rates and traits of sexual and gender minorities in the United States: Results from the National Crime Victimization Survey, 2017

## Methodology

The starting point for the analysis team was completing the Homeless Needs Inventory and Gap Analysis Table and the Housing Needs Inventory and Gap Analysis Table in the HOME-ARP Allocation Plan Template. The findings from completing these two tables warranted further data exploration. The most used data source to identify the gaps in housing and delivery of services was the HMIS database administered by CARES of NY, Inc – including data from the Coordinated Entry Program that is captured in the HMIS. The analysis team performed Exploratory Data Analysis (EDA) on the HMIS data entered by the programs in the CoC's covering the PJ area to identify potential variables that inform the gaps in the system. The EDA was not limited to HMIS data but included data from the comprehensive sources listed prior. Post EDA, the team narrowed down the findings into key points addressing qualifying activities and qualifying populations. Throughout the entire process, the analysis team followed the data and continued to research further into the needs and characteristics of the qualifying populations and where gaps exist in the community.

The team also conducted a survey of and hosted a forum/meetings with major stakeholders including affordable housing developers (i.e. Better Community Neighborhoods, Inc., Troy Community Land Bank); the Schenectady, Rensselaer, and Albany County Continuums of Care; homeless providers (i.e. Joseph's House, St. Paul's Center, SCAP, Bethesda House), providers serving victims/survivors of domestic violence, dating violence, sexual assault, stalking, and human trafficking (i.e. YWCA of Northeastern NY), veterans' groups (i.e. Albany Housing Coalition, Soldier On), all local Housing Authorities, other agencies that address the needs of the qualifying populations, and organizations that address fair housing (Legal Aid Society of Northeastern NY), civil rights (Center for Community Justice, Schenectady), and the needs of persons with disabilities (i.e. Mohawk Opportunities). The collected and analyzed data and survey results were presented and utilized to guide the conversation during a stakeholder forum on the highest and best uses of HOME-ARP funds to address homelessness and housing instability. A public survey and public hearing confirmed initial findings related to the greatest need for and best uses of HOME-ARP funds to address homelessness and housing instability.

## 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:*

Applications for the Consortium's HOME-ARP funding will be promoted via email to the Continuum of Care (CoCs) listservs and to all stakeholders that participated in the HOME-ARP planning process – including homeless service providers; providers that serve victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking; veterans' groups; all local Housing Authorities; agencies that address the needs of the qualifying populations; organizations that address fair housing, civil rights, and the needs of persons with disabilities; and affordable housing developers. The application will also be posted to CARES of NY, Inc.'s and the Consortium jurisdictions' websites.

Following a current process proven successful for allocating CoC and ESG-CV funds to the community, the HOME-ARP application will coordinate with each CoC's Rank & Review Committees with final approval for release by staff from the cities of Schenectady and Troy and Town of Colonie. This process for developing the application allows service providers who sit on the Committees to provide practical and applicable on-the-ground knowledge of best practices to inform the application. CARES and the jurisdictions will ensure the application reflects all preferences and requirements as outlined in this Allocation Plan. Once the application period closes, the review team, an unbiased group of community members recommended by the Rank & Review Committees and selected by the jurisdictions, will be asked to review and score applications to prioritize requests for HOME-ARP funds. Scores



will be submitted to the jurisdictions and will be taken into consideration when the jurisdictions make final funding decisions.

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

The PJ will administer affordable housing development directly.

*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:*

No 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. While CARES of NY, Inc. was contracted with to conduct the planning necessary to complete the allocation plan, no transfer of funds will occur until the allocation plan is approved by HUD.

CARES was contracted to conduct the required planning portion of the HOME-ARP allocation plan as CARES is the Collaborative Applicant and HMIS Lead of the Albany, Schenectady, and Rensselaer Counties CoCs, and provides Coordinated Entry Program support to the CE Program lead agencies in both Albany and Schenectady Counties. CARES also partners with the City of Troy (Rensselaer County) to administer its ESG and ESG-CV program funds; with the City of Schenectady to administer its ESG-CV funds; and with the City of Albany to administer its ESG, ESG-CV, and HOPWA program funds; and regularly provides the local jurisdictions with necessary data on homelessness for planning purposes.

CARES' role in HOME ARP, as agreed to by the three jurisdictions within the Consortium and CARES, is to conduct all required planning activities and draft the allocation plan on their behalf. Once the allocation plan is accepted by HUD, CARES will administer the RFP process and manage vouchering in partnership with the local jurisdictions for all projects – except development of affordable rental housing, of which the jurisdictions will retain complete administration.

In accordance with Section V.C.2. of the Notice (page 4), 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**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 620,000		
Acquisition and Development of Non- Congregate Shelters	\$ 577,856		
Tenant Based Rental Assistance (TBRA)	\$ 360,000		
Development of Affordable Rental Housing	\$ 1,700,000		

Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0%	5%
Administration and Planning	\$ 574,915	15%	15%
<b>Total HOME ARP Allocation</b>	\$ 3,832,771		

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

As a result of the needs assessment and gaps analysis conducted, the PJ will distribute HOME-ARP funds (\$3,832,771, less 15% administrative and planning costs, resulting in \$3,257,856 available for programming) as follows:

- 1) Allocate **44%** of funds (\$1,700,000) to **affordable rental housing development** to serve those exiting homelessness and households fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking.
- 2) Allocate **16%** of funds (\$620,000) to **supportive services**. Supportive services may include investment in mental health services in coordination with homeless service providers; service provider trainings (i.e. active-shooter, de-escalation, Diversity, Equity, and Inclusion (DEI); a housing/landlord navigator; and/or financial support to the Coordinated Entry Program for staff to manage referrals for HOME-ARP activities.
- 3) Allocate **15%** of funds (\$577,856) to **acquisition and development of non-congregate shelter** to create emergency housing options for those most in need, creating a preference for proposals serving families, singles, and/or youth.
- 4) Allocate **9%** of funds (\$360,000) to **tenant based rental assistance** to provide resources for security deposits for households with a rental voucher/stipend. Homeless households and households fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking will be prioritized.

Please note – all qualifying populations will be eligible for all activities. However, preferences will be established as noted in the below ‘preferences’ section of the plan.

1) Affordable Rental Housing Development: \$1,700,000 (44%)

The Consortium will dedicate \$1,700,000 to leverage state and federal affordable rental housing development resources, creating a preference through the RFP process for projects that prioritize persons exiting the homeless system, followed by those fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking, and finally persons at-risk of homelessness. Clients will be referred and accepted from a newly developed parallel Coordinated Entry (CE) Program.

2) Supportive Services: \$620,000 (16%)

The Consortium will dedicate \$620,000 to fund supportive services. Activities likely to be applied for, based on stakeholder and public feedback, include:

- Investment in mental health services onsite at homeless service provider locations or in coordination with homeless service case management;
- Trainings for the homeless service system (i.e. active-shooter, de-escalation, Diversity, Equity, and Inclusion (DEI);
- Housing/landlord navigator to build relationships with local landlords and create a pool of up-to-date available units, connecting those with rental vouchers to; or
- Investment in Coordinated Entry (CE) program staffing to fund the operation of a parallel CE program through which referrals will be made for HOME-ARP affordable housing and TBRA projects.

3) Non-Congregate Shelter: \$577,856 (15%)

The Consortium will dedicate \$577,856 to develop non-congregate shelter options. While the jurisdictions do not believe that this amount will be enough to create even a small non-congregate shelter, the funds are expected to be useful in leveraging additional state and federal resources for the capital needed to build and operate the shelter. The



non-congregate shelter will serve all qualifying populations, but it is expected to mostly serve those experiencing homelessness (especially those living in places not meant for human habitation or who do not feel comfortable entering a congregate setting); and victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking. Given stakeholder feedback, through the RFP process, projects that would prioritize families, singles, and/or youth will receive a preference.

#### 4) Tenant Based Rental Assistance: \$360,000 (9%)

The Consortium will dedicate \$360,000 for tenant based rental assistance, creating a preference through the RFP for projects that prioritize persons exiting the homeless system, followed by those fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking, and finally those at-risk of homelessness. Funding will be used specifically for security deposits for households already approved for a rental assistance voucher for which the voucher does not allow for security deposits. Assuming an average security deposit of \$1,313 (FY 2023 FMR for a two-bedroom apartment), this funding will serve approximately 274 households. Households would access TBRA through a parallel Coordinated Entry (CE) Program.

#### *Additional narrative, if applicable:*

Enter narrative response here.

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

The rationale for the PJ's plan is based on the data described above on the shelter and housing inventory, the needs identified in the gaps analysis, and stakeholder and public feedback. Details are below.

#### 1) Affordable Rental Housing Development

There is a shortage of affordable housing, exemplified by feedback from local housing authorities and stakeholders during the HOME-ARP outreach process that vouchers are currently underutilized as there is limited housing stock with which to utilize the vouchers, showing a need for additional permanent, quality housing at or below market rate. This feedback is substantiated by the fact that, according to 2014-2018 CHAS data (the most recent available), across the three-county region there are 28,775 households renting who earn less than 30% of area median income and are severely rent cost-burdened. A 2021 HUD dataset, 'Picture of Subsidized Households'<sup>30</sup>, exemplifies that Housing Choice Vouchers have had low utilization: 88% for Schenectady County, 76% for Rensselaer County, and 77% for Albany County. While HCVs have low utilization, there remains, for example, 7,300 applicants on the Schenectady Municipal Housing Authority waitlist<sup>31</sup>, supporting the community's argument that the issue lays with unavailable quality and affordable units to rent. In terms of supportive housing, site-based Permanent Supportive Housing (PSH) beds represent less than a third of all PSH beds in Schenectady, Rensselaer, and Albany CoCs, and are consistently fully occupied. This qualitative and quantitative information together shows a significant need for more affordable rental housing development. The HOME-ARP funding dedicated to affordable rental housing development will help to leverage state and federal resources to bring necessary additional affordable rental housing

<sup>30</sup> HUD Picture of Subsidized Households, 2021, <https://www.huduser.gov/portal/datasets/assthsg.html>

<sup>31</sup> Interview with Schenectady Municipal Housing Authority

to the localities. Given the limited HOME-ARP resources, preference for the homeless population and victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking will result in necessary affordable rental housing for the area's most vulnerable citizens – preferences supported by public and stakeholder feedback.

## 2) Tenant Based Rental Assistance

While Tenant Based Rental Assistance (TBRA) is a necessary part of ending homelessness and housing stability, at this point in time stakeholder and public feedback showed support for investing in affordable rental housing development instead of TBRA, given the fact that rental assistance vouchers are going unused due to the lack of suitable units. That being said, numerous homeless service providers expressed the lack of security deposit resources as a barrier in households with rental assistance vouchers to accessing housing. As such, HOME-ARP funding will be utilized to address this barrier by providing funding for security deposits for those that have rental assistance vouchers.

## 3) Supportive Services

While one of the primary unmet needs under the Supportive Services activity is financial assistance for rental arrears to prevent evictions, stakeholders argued (1) HOME-ARP funds are too limited to make a meaningful difference in this need (eviction prevention), (2) unfortunately, many of these households may become homeless before assistance can be provided, and (3) additional funds from the state are being provided for rental arrears. As such, it was recommended to focus Supportive Services dollars to meet other identified needs.

Specifically, the data (both quantitative and anecdotal) shows a supportive services program gap in terms of serving persons experiencing severe mental illness. Mental illness is the most prevalent disabling condition amongst those experiencing homelessness per local CoC data, and stakeholders have anecdotally reported an increase in the severity of mental health needs among clients served. This increased acuity has created a significant gap in services needed with local capacity as well as the inability of the homeless service providers to provide necessary case management to clients on site with severe mental illness. This has resulted, at times, in dangerous situations for both clients and staff at drop-in centers, shelters, and permanent housing locations. An emphasis on addressing those experiencing mental illness was supported by stakeholder and public surveys; when asked if funding should be targeted to any of thirteen subpopulations, persons with mental illness was identified most frequently by stakeholders (22 out of 24 respondents, or 92%) and second most frequently by the public (33 of 49 respondents, or 67%).

Stakeholders also reported the need for ongoing trainings for staff in order to better serve and meet the unique needs of the qualifying populations. Training topics noted were Diversity, Equity, and Inclusion, de-escalation techniques when working with clients, and active-shooter training.

Stakeholders also supported the need for a community wide landlord navigator who would build relationships with landlords in order to create one, centralized list of available, affordable rental units, to build trust with landlords in order to rent to tenants with a subsidy, and to be a point of immediate contact for tenant questions or problems if case management is not available.

Finally, in order to support referrals for HOME-ARP funded affordable rental housing development and TBRA, support services dollars will need to be allocated to Coordinated Entry Program staffing.

#### 4) Non-congregate shelter

Non-congregate shelter – of which there is currently limited capacity for in the PJ area - is an essential option for the population of persons experiencing unsheltered homelessness (which has remained stagnant in Schenectady and Rensselaer Counties over the last five years, and increased drastically in Albany County over the same time-period). Moreover, non-congregate shelter may address the ongoing need to ensure safe emergency housing options for persons who are transgender, for persons experiencing severe mental illness, and in an effort to reduce the spread of COVID-19 and other communicable diseases. Since the unsheltered population has the greatest set of housing and health needs, non-congregate shelter is the priority need for this population. Finally, stakeholders recommended additional non-congregate housing options for family and youth (24 years old and younger). Non-congregate shelter dedicated to youth would support the nearly 450 youth that experienced homelessness in the region in the last fiscal year, allowing for a safe, affirming, and service-specific environment for their needs.

#### 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:*

Based on affordable housing developer feedback, it is expected that the HOME ARP funds will leverage federal and state funds to develop an additional 5-12 housing units.

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

The PJ anticipates developing between 5 to 12 units of affordable housing with the funding allocated to this activity. Based on affordable housing developer feedback, it is estimated the HOME ARP allocation will successfully leverage federal and state funds to develop an additional 50 to 120 units. This investment of funds will result in the needed new supply of affordable rental housing units and solve the problem of clients with housing vouchers residing in shelters because of no affordable rental units in the community.

#### Preferences

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all

community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a 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).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.**

**For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ’s HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

***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:***

As required by the HOME-ARP regulations, all qualifying populations and subpopulations will be eligible to apply for all projects supported by HOME-ARP funding. The consortium, based on community feedback, selected preferences based on the most significant needs identified in the stakeholder and public outreach process and the gaps analysis. These preferences will be implemented through the RFP process. The preferences are as follows:

1) **Affordable Rental Housing Development:**

The Consortium intends to give the following preferences within the affordable rental housing development eligible activity by prioritizing through the RFP process projects that serve the following qualifying populations in the following order:

1. Homeless
2. Victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking
3. At-risk of homelessness

4. Other populations, as defined in the HOME-ARP regulations

2) Supportive Services

The Consortium made no preference determination among qualifying populations or subpopulations for supportive services. However, it is anticipated those experiencing homelessness or victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking will benefit the most from supportive services, as this funding will be planned in collaboration with homeless services and victim of domestic violence providers.

3) Non-Congregate Shelter:

There will be no preference among qualifying populations for non-congregate shelter. However, it is anticipated those experiencing homelessness or victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking will be most likely to apply for such shelter. The following subpopulation preference will be made through the RFP process for projects applying for non-congregate shelter funding: families, singles, and/or youth.

4) Tenant Based Rental Assistance (TBRA)

The Consortium intends to set a preference for TBRA – funding for security deposits for persons with housing subsidies. The Consortium intends to give the following preferences by prioritizing through the RFP process projects that serve the following qualifying populations in the following order:

1. Homeless
2. Victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking
3. At-risk of homelessness
4. Other populations, as defined in the HOME-ARP regulations

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

Projects that prioritize serving the homeless population; followed by victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking; and finally followed by those at-risk of homelessness will receive a preference for Affordable Rental Housing and Tenant Based Rental Assistance (TBRA) funded through HOME-ARP, as there is need for these populations that surpasses the amount of HOME-ARP funding available (as thoroughly described in the unmet needs and gaps sections above). For example, within each locality, the homeless system (emergency shelter, transitional housing, rapid rehousing, and permanent supportive housing) is at full capacity (Table 1 above); the average length of time homeless is at least 86 days (Table 2 above); less than 36% of households exit from shelter to permanent destinations (Table 3 above), and there currently are over 522 households on the CoCs' Coordinated Entry waitlist, waiting for supportive housing<sup>32</sup>. Similarly, the total number of permanent housing beds currently available across the three counties to house survivors of domestic violence equates to 237 beds. In the data provided from local Victim Service Providers' comparable databases, 714 clients were in Emergency Shelter programs for those fleeing domestic violence in 2021. This presents an unmet need of approximately 477 homeless clients who have experienced domestic violence in need of housing ( $714 - 237 = 477$ ). These preferences were substantiated by stakeholder and public feedback and survey results.

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<sup>32</sup> Pulled from Coordinated Entry Program in HMIS on 12/12/2022

While there are presenting needs for other qualifying populations – such as households below 30% AMI that are severely cost burdened – stakeholders and the public alike supported creating preferences for the homeless and victim of domestic violence, etc. populations, given these populations represent the most vulnerable in our community and the least likely to self-resolve without supports.

## Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

## Template:

*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):*

Affordable Rental Housing and Tenant Based Rental Assistance (TBRA):

A centralized Coordinated Entry (CE) program intake and parallel vulnerability index form capturing the priority needs will be completed in HMIS by all providers referring qualifying populations to HOME-ARP affordable rental housing and TBRA projects. All qualifying populations will be able to fill out a CE program intake/application at entities that currently process CE intakes (i.e. homeless shelters, social service providers, eviction prevention



providers, hospitals, jails, etc.) – as well as agencies that will be implementing HOME-ARP affordable rental housing and TBRA projects. Data from each client’s CE program intake and the Vulnerability Index for each type of eligible activity (affordable rental housing and TBRA) will be utilized to populate a waitlist by CE staff. The waitlist will have tiers of priorities based on the preferences described earlier. Agencies implementing affordable rental housing or TBRA funded through HOME-ARP will reach out to clients based on the existing waitlist when openings occur. All participating providers will complete a training specific on how to properly assess clients using the vulnerability index and correctly enter information into the data base for referral purposes.

#### Supportive Services

There will not be a formal referral method for supportive services given the nature of the services to be funded.

#### Non-Congregate Shelter

It is expected that the County Departments of Social Services, shelter providers, and outreach programs will be the most frequent agencies referring clients to non-congregate shelter funded through HOME-ARP. All qualifying populations will be eligible. A preference for families and youth may be made through an individual project waitlist.

*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):*

All qualifying populations will be eligible to fill out a CE intake/application for affordable rental housing and TBRA. The CoC’s existing CE intake will be edited to ensure that clients are identified by qualifying population as defined in the HOME-ARP program and are not turned away due to non-homeless status.

Referrals will not be made through CE for supportive services or non-congregate shelter, as described above.

*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):*

A centralized CE intake and parallel vulnerability index form capturing the priority needs will be completed in HMIS by all providers referring qualifying populations to HOME-ARP affordable rental housing, TBRA, and eviction prevention projects – under supportive services. The Vulnerability Index (VI) tool will create tiers, as outlined below, capturing the Plan preferences. The CE unit will use data entered into HMIS on qualifying populations to identify participants meeting the Plan’s priorities to then be assessed for HOME-ARP programs. To ensure fair and equitable access, a prioritization list will be developed specific to each service then utilized to refer qualifying populations to HOME-ARP projects and activities. All qualifying populations will be eligible for each activity funded by HOME-ARP. All participating providers will complete a training specific to assessment for eligible referrals and data entry for referral making.

#### Affordable Rental Housing & Tenant Based Rental Assistance Projects

Applicants for Affordable Rental Housing and TBRA programs supported by HOME-ARP funding will be prioritized during the RFP process if they follow the below predetermined prioritization method (as supported by the needs outlined earlier). This prioritization method will be reflected in the Vulnerability Index (VI) tool utilized for qualifying populations screened for affordable rental housing supported by HOME-ARP funding.

Tier 1: Homeless

Tier 2: Households fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking

Tier 3: Households at risk of homelessness

Tier 4: Other populations, as defined in the HOME-ARP regulations.

Supportive Services: N/A.

Non-congregate shelter: N/A.

*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):*

N/A.

### **Limitations in a HOME-ARP rental housing or NCS project**

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

### **Template**

*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:*

The local PJ does not intend to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation.

*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:*

N/A

*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):*

N/A

### **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*

N/A

- *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.*

N/A

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

N/A

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

N/A

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

N/A

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

N/A