

# Orangeburg County/Lower Savannah Regional HOME Consortium

HOME-American Rescue Plan

Draft Allocation Plan



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# HOME-ARP Draft Allocation Plan

**Participating Jurisdiction (PJ):** Lower Savannah Regional HOME Consortium

**Date:** 2/6/2023

## Introduction

In September 2021, the U.S. Department of Housing and Urban Development announced the allocation of \$3,855,545 to Orangeburg County/Lower Savannah Regional HOME Consortium (LSRHC) for a new grant called the HOME Investment Partnerships American Rescue Plan (HOME-ARP). The purpose of HOME-ARP funds is to provide homelessness assistance and supportive services through several eligible activities. Eligible activities include acquisition and development of non-congregate shelter, tenant based rental assistance, supportive services, HOME-ARP rental housing development, administration and planning, and nonprofit operating and capacity building assistance.

HOME-ARP funds must assist people in HOME-ARP "qualifying populations", which include:

- Sheltered and unsheltered homeless populations
- Those currently housed populations at risk of homelessness
- Those fleeing or attempting to flee domestic violence or human trafficking
- Other families requiring services or housing assistance or to prevent homelessness
- Those at greatest risk of housing instability or in unstable housing situations

To receive funding, the jurisdiction must develop a HOME-ARP Allocation Plan which describes the distribution of HOME-ARP funds and identifies any preferences for eligible activities. This plan will be submitted and approved by HUD. The development of the HOME-ARP Allocation Plan must also be informed through stakeholder consultation and public engagement. Lower Savannah Council of Governments prepared the HOME-ARP Allocation Plan on behalf of LSRHC. The following is the Orangeburg County/Lower Savannah Regional HOME Consortium HOME-ARP Allocation Plan.

Please see HOME-ARP common definitions in the Appendix.

## Consultation

### ***Summarize the consultation process:***

The LSRHC’s stakeholder consultation process consisted of developing and disseminating an online stakeholder survey in order to capture broad assessments of the community needs and areas for ARP allocation as well as specific insights gathered by agencies and other local leaders. The LSRHC emailed key stakeholders in the community for their input and feedback. The online survey was open from November 7, 2022 through January 31, 2023. The survey included seven ARP program-specific questions and one open-ended comment section for community needs assessment. The survey received a total of 30 respondents, including those representing homeless services providers, the Continuum of Care (CoC), Fair Housing agencies, affordable housing developers, domestic violence advocacy groups, Veterans groups, and others. Some responders were from the same organization, those responses were merged and weighted appropriately.

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

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
<b>United Way of the Midlands</b>	CoC Lead Agency, Funder of Affordable Housing	Survey	Lack of affordable rental housing and operating support needed for area’s only emergency shelter, Samaritan House. Priority should be development of new affordable rental units. We have funding for affordable housing and would be interested in partnering on affordable rental projects.
<b>United Way of Aiken County, Inc.</b>	Funds many programs that serve homeless	Survey	Challenges in the region include lack of available, affordable housing and evictions. Supportive services are ineffective if there are no housing choices or funds available. Homeless prevention/assistance would be beneficial. Once homeless, choices become limited. Construction of rental units is robust but the rent will not be affordable. Landlords are opting to sell which creates more homelessness. We need long term solutions which involve education and jobs.
<b>Mental Health America of Aiken, Barnwell, and Edgefield Counties</b>	Homeless Service Provider, Organization Serving	Survey	I see that we are the only provider of transitional shelter for those with mental health issues and we only serve women, and the need is there for men.

	People with Disabilities, Fair Housing Organization, Continuum of Care Member, Mental Health Provider		Supportive services are needed. We need to get people stable no matter how this looks. Job coaching, counseling, medical, financial education and so on. NCS would be wonderful however we must also meet their needs as far as what their issue is that made them homeless example, drug addiction, mental health issues, lack of education, etc.
<b>Lower Savannah Council of Governments</b>	Regional Government Support	Survey	There are not enough shelters in the region and not enough affordable housing inventory. CDV is a problem in the state and region. There are not enough shelters and supportive services for abused persons. HOME-ARP funds could be impactful to combat this issue in the region.
<b>Second Baptist Community Development Corporation</b>	Homeless Service Provider, Domestic Violence Service Provider, Veterans' Group, Housing Authority, Local Government	Survey	The homeless problem is growing across the nation and here in our communities. It will only grow more difficult to address if the funding sources from the National, State and Local levels continue to be inadequate and sporadic. HOME-ARP funds are urgently needed for acquisition and new construction as the need for affordable housing is ever growing. Without adequate supply of affordable housing individuals and families have no option other than the streets. As a developer of affordable housing, we see a dire need for extended rental assistance. Nonprofit developers tend not to have the financial depth to meet expenses long term without the receipt of the established rents that are established and controlled.
<b>Cumbee Center</b>	Domestic Violence Service Provider	Survey	We have clients who can't find affordable housing after leaving their abusive partner, often with children and animals which requires housing well outside their current income capabilities. There are no support services for homelessness and no transition plans for subsidized housing to affordable housing. We absolutely need more affordable housing. Some clients can't qualify for Section 8 however because their taxes are still tied to their abusive partner they're

			attempting to leave. We have one emergency shelter for those fleeing abuse and it only holds 20 beds. For over 600,000 people that's our only existing resource. We can keep people for up to 60 days, which isn't enough time for them to gain a stable footing. Cumbee Center is ready to move on transitional housing that would serve clients up to 2 additional years. Affordable housing and transitional housing to build is expensive, but the best long-term solution to this silent and pervasive problem.
<b>New America Corporation</b>	CHDO	Survey	Need for affordable rental housing. Need for rent subsidy. Funds could be used for acquisition and construction of affordable rental housing. NCS helps fosters greater safety, privacy, and personal pride when non- congregate shelter can be provided.
<b>Community Inter-Generational Enrichment Organization, CIGEO</b>	Community Organization	Survey	Homelessness is a growing issue in communities that is affecting the quality of life for all. Homeless citizens should be giving this same opportunity for a full recovery, regardless of their life decisions. Supportive services are the gateway to the full recovery from homelessness. This is proving with substance abuse as well. Homeless citizens need more educational and hands on training type intervention to a full recovery to productive citizenship that includes community service projects, community education enrichment, job placement, transportation assistance, and neighborhood-like homes.
<b>Aiken County Homeless Coalition</b>	Homeless Service Provider	Survey	Aiken has only one shelter for temporary housing. We need a "Resource Center" that provides one location where the homeless can receive assistance. Need to both acquire and build affordable housing. We have an initiative to build a Tiny Homes Community. There are too many people living in poverty where the majority of their income is spent in rent/mortgage. We need to develop housing with a sliding scale and less

			restrictions for qualification. Single men have a tough time finding affordable housing. I believe the most critical need in our community is low-income affordable housing. The rental assistance is only temporary, restricted and not long term. Our group is ready to use these funds to establish a Day/Resource Center which will benefit not only those who are already homeless but also as a preventative measure for those on the verge of homelessness. With these funds the community will be improved.
<b>The Samaritan House of Orangeburg County, INC</b>	Homeless Service Provider	Survey	Not enough decent rental housing. More staff are needed to provide supportive services. TBRA is the highest need and best use of funds.
<b>Southeastern Housing and Community Development</b>	Affordable Housing Nonprofit	Survey	Need the units for the housing of the homeless and funding to provide the supportive services. There are homeless people that need the unit but counseling also to stabilize their lives. There also exist those who are depending on family and friends for temporary shelter and they keep bouncing back and forth with no stability. Look at old hotels to renovate to create a separate space for families and remove potential blight from the town.
<b>Salvation Army of Aiken</b>	Homeless Service Provider	Survey	Affordable, safe & livable housing is scarce. Tremendous need especially for families & women. Acquisition and construction of affordable rental housing should be the top priority for these funds. There is also a need for Access to free laundromat & showers; a place to safely store personal items & charge cell phones.
<b>Coalition for the Homeless</b>	Homeless Service Provider	Survey	Construction and development of housing is desperately needed. Tiny housing is a strong need and would be a strong first step in permanent housing.
<b>Lou's Connecting Hands, Hearts and Minds</b>	Low Income Families and academic, Career Readiness	Survey	There is a lack of assistance and training to help tenants or the homeless move forward and become stable. The largest part of the community exhibits the

			attitude that they caused their own problem and they need to fix it. There is a real necessity for someone, our representatives, our local agencies to develop activities for children in these low-income housing locations. Create more shelters for women and children and not separate them because of age. Families need to stay together. Rooms for mothers and their children to stay together and not separated. Immediate Housing Counseling, Financial Literacy, Credit Counseling for stability, as well as immediate transportation and Career Readiness are all needed.
<b>Christ Central Ministries Inc. Aiken/Graniteville</b>	Homeless Service Provider, Domestic Violence Service Provider, Continuum of Care member	Survey	Lack of affordable housing - Whole families are moving into motel rooms until their monthly checks are depleted and then turn to non-profits for help. Some working poor have been doing this for over a year. Disabled people are also doing the same.
<b>South Carolina Department of Veterans' Affairs</b>	Veterans' Group	Survey	There are gaps in shelters for women and families. Development of Affordable Housing should be the priority for HOME-ARP funds. Supportive services, specifically housing counseling, are also needed.
<b>Vocational Rehabilitation</b>	Organization Serving People with Disabilities	Survey	There is a need for an Emergency Shelter and transitional housing. Also, a day resource center is needed. Non-congregate shelters are needed in the area, funds can be used to create those shelters.
<b>Aiken Department of Public Safety</b>	Local Government	Survey	The current services do not work together enough to leverage resources. Supportive Services should be the top priority for funds, especially homelessness prevention. Work with families that have some income but are struggling to maintain housing. Often this is because rent is too high and the property is not in good condition - leads to high utilities and low quality of life.
<b>ACTS</b>	Homeless Service Provider,	Survey	Gaps include no place for the homeless during the daytime, not enough homeless shelters, need more affordable



	Organization Serving People with Disabilities, Domestic Violence Service Provider		housing, and educating tenants on their rights and responsibilities. A daytime shelter is needed where the homeless would be offered basic job skills, mental health, health screening, resources available
<b>Goodwill of Middle Georgia &amp; the CSRA</b>	Organization Serving People with Disabilities, Employment Services, Veterans Group	Survey	There is a lack of adequate housing for local residents and lack of transportation from available housing to jobs. More affordable housing options are needed. Access to middle skilled jobs and training is the best way to prevent homelessness.
<b>CSRA Economic Opportunity Authority, Inc.</b>	Homeless Service Provider, Organization Serving People with Disabilities, Fair Housing Organization, Continuum of Care Member	Survey	Clients are in need of assistance with budgeting, basic life skills classes, transportation and employment skills. There are many housing units being built but many of them are not affordable for the low-income population. Rental assistance is needed.
<b>City of Bamberg</b>	Local Government	Survey	There is not enough affordable housing. Use funds to renovate some of the existing rental and make them energy efficient. Many affordable rentals are not in good condition.
<b>City of Aiken</b>	Local Government	Survey	Not enough adequate, safe, and well-maintained housing stock. Need more staff to manage and inspect shelters and rental housing. believe all potential uses of HOME-ARP funds could work if all agencies could come together as a whole and not go off in different directions competing against one another. Come up with a doable plan and make it happen. Pull together all resources available and look at what other cities (especially bigger cities) are doing and do on a smaller scale to fit Aiken. It can be done.
<b>City of Aiken, Building Inspections</b>	Local Government	Survey	Non-congregate shelter should be a high priority. Couple this with assessment of skills needed to manage a residence independently. I encounter many residents who do not have the skills to function and manage daily life independently. They usually end up damaging the property by neglect and

			end up being legally evicted. Skill training which would help them stay and maintain the existing home they occupy would be beneficial.
<b>ABBE Regional Library System</b>	Local Government	Survey	Many folks use the public libraries as daytime shelters including trying to perform basic hygiene (washing, shaving) in the public restrooms as well as sleeping in our buildings. They need access to showers, laundry services and places to cook and sleep. There are not enough supportive services including temporary overnight as well as daytime shelter. Non-congregate shelter sounds like an approach that confers more dignity onto people than the traditional shelter approach.
<b>Free Medical Clinic of Aiken County dba Community Medical Clinic of Aiken County</b>	Organization Serving People with Disabilities, Free Medical Clinic	Survey	We lack adequate safe, affordable housing options to rent or purchase. We also lack effective transitional housing options that are set up to prepare residents to transition smoothly into self-sufficiency. We need to invest more in transitional housing options and supportive services that prevent homelessness. We need to consider constructing safe, affordable rental units that are also energy efficient to keep their utilities low. We should also consider constructing more subsidized housing options in multiple different areas of town.
<b>NAACP Aiken County Branch</b>	Civil Rights Organization	Survey	Our homeless population have been hidden until now. There is no real homeless shelter here in Aiken and therefore no real place for the homeless to go. As the problem grows, the more evident it will become but are we prepared to help those people in need? They need more than food blessing boxes and clothing drop off bins, the need safe places to sleep. Supportive services such as prevention assistance and counseling are definitely needed.
<b>City of New Ellenton</b>	Local Government	Survey	More shelters and housing assistance is very much needed throughout our county. New safe affordable housing is needed. Security measures need to be

			<p>utilized when developing affordable housing communities. Individual cottages could be placed on Christ Central property in New Ellenton. Undeveloped land or property/homesites that are unlivable could be purchased and turned in to private affordable housing. ARP might also be used to provide rental deposits and financial training.</p>
<p><b>New Ellenton Christ Central Ministries Inc.</b></p>	<p>Homeless Service Provider, Emergency Shelter &amp; Homeless Rehabilitation Counseling &amp; Job Training</p>	<p>Survey</p>	<p>Gaps include no Job training, no counseling, no mentorship and no support services. Non-congregate shelter should be the top priority for HOME-ARP funds. We need Emergency shelter and tutoring children and senior citizens activities.</p>

## **Public Participation**

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

- ***Public comment period: start date - 2/1/2023 end date - 2/15/2023***
- ***Public hearing: 2/15/2023***

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

In addition to the newspaper ad for the public notice and public comment period, the LSRHC also advertised the public hearing and posted the draft HOME-ARP allocation plan on Lower Savannah COG's website ([www.lscog.org](http://www.lscog.org)) to make the plan readily available for comment start date 2/1/2023 end date 2/15/2023. LSRHC also provided virtual access to the public hearing for citizens that could not attend the hearing in-person.

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:***

A summary of comments will be included after the public participation process.

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

Two stakeholder surveys from the Town of Hampton and Drumgoole Family Initiatives were not accepted during the consultation process. The Town of Hampton is not located in the PJ's service area, and Drumgoole Family does not provide services in the service area.

## Needs Assessment and Gaps Analysis

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

### Homeless as defined in 24 CFR 91.5

The Continuum of Care (CoC) releases an annual Point-in-Time (PIT) Count that includes valuable data for addressing the needs of residents who are experiencing homelessness. The 2020 Columbia/ Midlands CoC count data was used to capture the most recent and relevant homeless population data due to alterations in methodology during the 2021 count to mitigate the effects of the COVID-19 pandemic. It is noted that the Continuum of Care's jurisdiction includes additional counties not included in the LSRHC service area, so the data reflected in the PIT count may not accurately capture the precise counts of the LSRHC region. According to the 2020 PIT Count, males are much more likely to be homeless than females. The majority of persons were reported as single-person households, and about 19% of those counted were adults with children. Black or African American residents are the largest demographic of people experiencing homelessness. Over 64% of people experiencing homelessness are Black or African American. One hundred fifty-five homeless Veterans were identified during the PIT count. Six hundred thirty-four households were in emergency shelters, 240 were in transitional housing and 266 unsheltered. One hundred fifty-seven people reported having a severe mental illness and 99 had chronic substance abuse. Lastly, 69 homeless persons were survivors or were fleeing domestic violence.

### Homeless Needs Inventory and Gap Analysis Table

	Homeless												
	Current Inventory					Homeless Population					Gap Analysis		
	Family		Adults Only	Youth Only*	Vets	Persons in Families (at least 1 child)	Persons in Adult HH (w/o child)	Persons in Youth Only HH*	Vets	Victims of DV	Family	Adults Only	Youth Only*
	# of Beds	# of Units	# of Beds	# of beds	# of Beds						# of Beds	# of Beds	
Emergency Shelter	174	20	471	24	10								
Transitional Housing	128	30	272	51	104								
Sheltered Homeless						208	662	69	130	58			
Unsheltered Homeless						9	257	15	25	11			
<b>Current Gap</b>											85	-176	-9

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

\*Youth Only includes Youth (18-24) and Child only (Under 18)

**Table: Demographic Composition of Homeless Persons**

Demographic	Percentage	Total
Male	64.3%	733
Female	35.3%	402
Transgender & Gender Non-Conforming	0.4%	5
Adult(s) with no Children Household (Single-person or two adults)	80.6%	919
Family Household (Adult with children)	19.0%	217
Single Children Household	0.4%	4
White	30.4%	347
Black or African American	64.6%	737
Other Race	5.0%	56
Veteran	--	155
Severe Mental Illness	--	157
Domestic Violence Experience or Fleeing	--	69

**Data Sources:** 1. Point in Time Count (PIT)

**Populations At-risk of Homelessness as defined in 24 CFR 91.5**

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability. Using HUD's 2015-2019 CHAS data, the LSRHC region has an estimated 19,310 households with incomes below 30% AMI. Nearly 56% of these households are renter households. Those at-risk of homelessness include an estimated 14,000 households who are severely cost burdened, paying over 50% of their income toward housing. Of those, 5,290 are renting households in the extremely low-income range (<30% AMI). An estimated 26,365 LMI (<80% AMI) households are cost burdened, paying more than 30% of their income in housing costs, 13,899 (53%) of those being LMI renters. Of the severely cost burdened, 8,865 households are also in the extremely low-income range (<=30% AMI) and are considered at greatest risk of housing instability.

**Housing Cost Burden and Extreme LMI Table**

County	Cost Burdened (>30% Income towards housing)	Severe Cost Burden (>50% Income towards housing)	Households <30% AMI	Total Households
Aiken County	15,690	7,260	9,075	67,600
Allendale County	914	395	735	3,365
Bamberg County	1,400	570	800	5,335
Barnwell County	2,135	1,175	1,620	8,360
Calhoun County	1,539	724	1,395	6,180
Orangeburg County	8,235	3,945	5,685	33,060
LSRHC TOTAL:	29,913	14,069	19,310	123,900
<b>LSRHC as a %</b>	<b>24.1%</b>	<b>11.4%</b>	<b>15.6%</b>	<b>100%</b>

**Data Sources:** HUD CHAS 2015-2019

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

According to the National Coalition Against Domestic Violence 42.3% of women and 29.2% of men in South Carolina experience intimate partner physical violence, intimate partner sexual violence and/or intimate partner stalking in their lifetimes. South Carolina SLED's S.C. Incident Based Reporting System (SCIBRS) identified a total of 2,990 victims that reported domestic violence in Aiken, Allendale, Bamberg, Barnwell, Calhoun, and Orangeburg counties during 2020. Cumbee Center to Assist Abused Persons (CAAP), a victim service provider serving Aiken, Allendale, and Barnwell counties provided supportive services to a total of 328 domestic violence victims, including 108 that received shelter services in 2019.

Due to lack of resources, county level data of the number human trafficking victims in the region is not available. In 2021, 206 human trafficking cases were reported to the Human Trafficking Hotline in the state of South Carolina. Across the state, victims are most frequently females, both adults and minors, experiencing sex trafficking. According to the South Carolina Human Trafficking Task Force 2021 Annual Report, 48% of the human trafficking charges pending in the state are located in Aiken County.

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

There is a large overlap between those at-risk of homelessness (above data) and households in need of assistance to prevent homelessness or at greatest risk of housing instability. Lack of affordability is the primary issue highlighted in data and consultation. Approximately 35,000 Low-income households with incomes less than 50% AMI make up an estimated are cost burdened or severely cost burdened in the consortium region. While there are insufficient data sources that match the exact definition of QP #4, we can glean general demographics and need from looking at the six counties' poverty levels and characteristics. Poverty is often a direct correlation to households requiring housing assistance to prevent homelessness or to those at-risk of housing instability.

According to ACS, there are 62,042 (18% of the 6-County area) residents below the poverty level, of which 36% are under 18 years old and 22% are above the age of 60. Of those living under the poverty level, an estimated 34% are White, 58% are Black or African American, and 8% are other or mixed races. Less than 5% of the residents below the poverty level identify as Hispanic or Latino. There are more females (35,043) under the poverty level than males (26,999).

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

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

The primary unmet need as it pertains to homeless needs inventory is the availability of beds and units for adults who are experiencing homelessness. There is a need for 176 beds in order to provide housing services for adults. During our consultation, respondents also highlighted the following unmet service needs for the homeless population: housing search and counseling, mental health services, employment services, substance abuse treatment services, transportation, and comprehensive case management.

Stakeholders across the board reported a need for supportive services. In addition to the services themselves, the service delivery system needs to be improved. Many persons in need of assistance do not know how to access the limited resources that are available. Finance and housing counseling are also needed.

The lack of shelters for families and domestic violence victims, and the lack of affordable rental housing outside city limits were highlighted by stakeholder consultation. Stakeholders cited families are increasingly becoming homeless and there are not enough local resources to provide the assistance they need.

#### **Populations At-risk of Homelessness as defined in 24 CFR 91.5**

With approximately 35% (nearly 44,000 households) of the households in the LSRHC's region being cost burdened (whether owner or renter), the overall need is clear: more affordable housing. An inadequate supply of affordable rental housing inventory was repeatedly noted during consultation. Lack of affordable housing inventory and a persistent affordability gap challenges populations who have recently exited homelessness and those households at-risk of homelessness or housing instability. Those at-risk of homeless or housing instability often need short-term subsidies such as mortgage/rent assistance to avoid foreclosure or eviction, as well as utility assistance to avoid shutoff or security deposits to allow new rental contracts. Stakeholders expressed concern of the Housing Choice Voucher program. Tenants that receive a voucher are often not able to identify unit that will accept a voucher. In addition to the lack of affordable housing, stakeholders identified a need for supportive services such as housing or financial counseling, and landlord mediation for eviction proceedings.

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

According to the 2022 Domestic Violence Counts Report for South Carolina conducted by the National Network to End Domestic Violence, there were 21 requests for shelter, housing, and other supportive services that could not be provided due to lack of resources on the day of the count. Approximately 81% of these unmet requests being for housing and emergency shelter. According to the South Carolina Coalition Against Domestic Violence and Sexual Assault (SCCADVASA), 3,415 survivors of domestic violence and their families received shelter from Domestic Violence Centers across the state during 2021. Over 270 survivors were turned away from shelter due to lack of space.



Victims of domestic violence and single mothers were also highlighted as QPs needing particular support. Stakeholders discussed the lack of beds available for domestic violence victims in the region. There is also a need for facilities that provide longer lengths of stay, such as transitional housing. In addition to bed space, there is a need for intensive case management. Victims/survivors of domestic violence and sexual assault face a lot of additional challenges: overcoming trauma to be able to remain stably employed and housed can require longer-term housing assistance.

South Carolina lacks specialized housing programs for both minor and adult human trafficking victims throughout the state. The consortium region has zero victim service providers that provide shelter and specialized services for human trafficking victims. Local homeless shelters do not adequately meet the complex needs of these victims.

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

The unmet needs of the populations needing assistance to prevent homelessness or at risk of greater housing instability mirror those from above, including rental payment assistance or utility deposit assistance and the development of affordable rental housing units. Housing counseling, mental health services, and homeless prevention were highlighted during our consultation as service needs for those at greatest risk of housing insecurity. The region is also in need of a centralized resource center where populations needing services can go to get referrals to appropriate resources.

***Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, Tenant-Based Rental Assistance (TBRA), and affordable and permanent supportive rental housing:***

The below local organizations and entities offer a variety of resources that assist the region's QPs on an ongoing basis. The LSRHC will consider and coordinate appropriately with organizations that can assist with the goals and implementation of selected activities described in HOME-ARP Activities section of this plan.

**United Way of the Midlands and Midlands Area Consortium for the Homeless (MACH)**, the Continuum of Care, provides a variety of supportive services, including homeless prevention services to help families stay in their current housing. All six of the counties that the LSRHC serves are located within the MACH CoC.

The **South Carolina Regional Housing Authority No. 3** serves Aiken, Allendale, Bamberg, Barnwell, and Orangeburg counties. The Housing Authority has 786 public housing units and 17 developments under management, serving nearly 2,000 residents in its service area. These units include single-family homes, apartments, and townhouses, with bedroom sizes ranging from one to as many as five bedrooms. Additionally, the Housing Authority has 584 Housing Choice Vouchers.

**The Aiken Housing Authority** is the local public housing authority (PHA) serving City of Aiken residents. is to assist low-income families with safe, decent, and affordable housing opportunities in a non-discriminatory manner as they strive to achieve self-sufficiency and improve the quality of their lives. Beaufort Housing Authority oversees 248 public housing units and 990 Housing Choice Vouchers.

**Mental Health America of Aiken County** is an advocate and a community resource by promoting positive mental health in Aiken County. It operates Nurture Home, a transitional housing program for women suffering from mental illness. It provides a stable educational environment of personal growth, healthy living, medical treatment, financial education, job coaching, and finally, successfully re-entering society. Weekly support groups are offered that enable residents to become empowered and confident in their choices and relationships. Parenting classes, health and nutrition classes, and various volunteer activities are provided. Residents are also provided credit counseling and budgeting financial literacy education.

**Salvation Army Aiken** operates an emergency shelter that has 25 beds for single adults, and 19 beds for families with children. Additionally, it provides services such as food pantries, family stores, rent & utilities emergency assistance, and disaster response.

**Cumbee Center to Assist Abused Persons (CAAP)** supports and empowers domestic violence and sexual violence victims and their families by providing services, reducing the tolerance of abuse, and advocating for social change. CAAP runs a 20-bed shelter for domestic violence victims and serves Aiken, Allendale, and Barnwell Counties. Case managers work with each survivor to provide them with an individual plan to obtain needed services, develop short-term and long-term resources, and safety plans, and help connect and coordinate services from multiple service providers. Information, referrals and follow-up are tailored to provide ongoing support and assistance in accessing specialized domestic and sexual violence services while ensuring that survivors have access to resources and other supportive services. Emergency financial assistance is based on individual needs and the availability of funds. Financial assistance can include but is not limited to assistance with applying for public benefits, crime compensation, lease startup cost, food, clothing, emergency shelter and other personal advocacy.

**South Carolina Victim Assistance Network (SCVAN)** is a statewide resource that provides support to victims of crime, including domestic violence and human trafficking. SCVAN provides resource, referral and advocacy services to crime victims and victim service providers through its Crime Victim Information and Service System (CVISS) Program. CVISS program staff share important information by: 1) Managing the SCVAN website; 2) Providing regular electronic communication through e-updates to over 4,000 subscribers as well as on social media platforms; and 3) Coordinating and/or delivering outreach and trainings to crime victims, victim service providers, and the general public to create awareness around victim rights, available resources, and the impact of crime and related issues.

**CASA/Family Systems** is a private, not-for-profit organization serving Bamberg, Calhoun and Orangeburg counties whose primary focus is providing prevention, advocacy, and intervention to individuals and families who have been affected by sexual assault, family violence, and/or child abuse and neglect. CASA/Family Systems' temporary emergency shelter for battered women and their children was started in 1991 and has the capacity to house 18-21 women and children at any given time. The shelter is open 24 hours a day – seven days a week providing services to victims of domestic violence at no cost. Services include individual and group counseling, advocacy, and case-management.

**My Father's House Stand at the Crossroads Ministries (SATCM)** is a Christian-based residential community for women in transition located in Aiken. It has the capacity to serve eight single women at a time in My Father's House, and Crossroads Community apartments accommodate five families of women with children. In addition to transitional housing, the campus includes a community room, laundry cottage, and thrift store.

There are many social service agencies in the LSRHC region that provide outreach and supportive services to very low- and low-income individuals and families in order to prevent homelessness: **Aiken-Barnwell Counties Community Action Agency, Orangeburg-Calhoun-Allendale-Bamberg Community Action Agency Inc., Christ Central Mission Station, and the Salvation Army of Orangeburg County.** Services provided by these agencies include food assistance, emergency financial assistance, and job training.

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

Current gaps within the shelter, housing inventory, and service delivery systems include: non-congregate shelter; sufficient case management to quickly resolve the household's homelessness or prevent homelessness; staffing to allow for a reasonable caseload; non-congregate shelter beds for single adults. Multiple stakeholders highlighted the lack of shelters for DV victims/survivors as well as single men.

As noted above, the primary gap in the shelter and housing inventory is the availability of beds and units for adults with no children present. There is a need for 176 more beds for this population.

There is a shortage of affordable housing in the LSRHC service area. The availability of affordable housing units does not meet the needs of the qualifying population. There is a need for quality affordable housing units of multiple sizes in neighborhoods throughout the region. Stakeholders from multiple counties/organizations highlighted the lack of affordable housing inventory. Many stakeholders also discussed the need for an improved service delivery system that provides better access to persons in need of assistance. There is a lack of education and outreach for the services that are available.

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

LSRHC recognizes the definition of Other Populations set forth by HUD in the CPD Notice (Families Requiring Services or Housing Assistance to Prevent Homelessness or At Greatest Risk of Housing Instability). The criteria related to these categories include households/persons who are (1) extremely low-income with a severe cost burden, or households with (2) an annual income that is less than or equal to 50% of the area median income meet one of the following conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5. No further characteristics of housing instability have been defined in the Consortium’s ConPlan; thus, LSRHC will use the criteria listed in the first six conditions listed in the “At risk of homelessness” definition established at 24 CFR 91.5.

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

The analysis above and consultation with key stakeholders have identified the following priority needs:

1. Affordable Rental Housing Development
2. Acquisition & Development of Non-Congregate Shelter
3. McKinney-Vento Supportive Services

A lack of affordable housing availability has been highlighted via the data and stakeholder input. For homeless populations, priority needs include emergency shelter, rapid re-housing and supportive services to achieve housing stability. For households experiencing housing instability or who are at-risk of homelessness, priority needs include providing appropriate supportive services, including medical and mental health treatment, counseling, transportation, childcare, life skills, job training, case management services, and other services essential for achieving independent living to help prevent homelessness and increase housing stability. Persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking have a particular need for emergency and transitional housing support as well as pertinent supportive services.

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

To determine the level of need and gaps, the LSRHC looked at both qualitative and quantitative measures. Data from the US Census, CHAS, 2020 CoC Point in Time Count, and 2020 Housing Inventory Count were used in partnership with feedback and on-the-ground insights from key stakeholders in the area. The takeaways from data analysis and stakeholder input were incorporated into the needs assessment.

## **HOME-ARP Activities**

*Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:*

The LSRHC expects to administer programs directly. Once the LSRHC has received the full HOME-ARP grant award from HUD, it will advertise the funds available throughout the region. Any organization, developer, subrecipient, or Community Housing Development Organization (CHDO) is eligible to apply. Applications will be reviewed in the order received. All applications received will be reviewed for completeness, eligibility, and ability to deliver on the priority needs identified within this plan. Each applicant will also be reviewed for their ability to carry out the project that meets all eligibility criteria.

Award(s) will be made based on the applicant's project scope as it pertains to the outlined priority needs in this plan. The scoring will also take into account the proposed project's long-term sustainability, as well as the applicant's familiarity and experience with utilizing federal funding, which includes agency-government partnerships, matching funds policies, and ability to comply with all federal and local requirements.

*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:*

LSRHC will administer the program. The LSRHC has not yet used the HOME-ARP administrative funds.

## **Use of HOME-ARP Funding**

	<b>Funding Amount</b>	<b>Percent of the Grant</b>	<b>Statutory Limit</b>
Supportive Services	\$ 771,109		
Acquisition and Development of Non-Congregate Shelters	\$ 1,156,664		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 1,156,664		
Non-Profit Operating	\$ 192,777	5%	5%
Non-Profit Capacity Building	\$ 0	0%	5%
Administration and Planning	\$ 578,331	15%	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 3,855,545</b>		

*Additional narrative, if applicable:*

**Development of Affordable Rental Housing**

LSRHC will allocate a portion (30%) of its allocation to the development of affordable rental housing. Please see further information on page 23 in the *Housing Goals* section.

**Acquisition and Development of Non-Congregate Shelters**

LSRHC will allocate another 30% of HOME-ARP funds towards the acquisition and development of non-congregate shelters.

**Supportive Services**

The LSRHC will allocate approximately 20% of HOME-ARP funds towards Supportive Services in the amount of \$771,110. By funding Supportive Services, the LSRHC aims to increase housing stability and reduce levels of homelessness and those at-risk of homelessness within the qualifying populations by providing baseline support that addresses multiple challenges of these persons and households. Supportive Services activities will prioritize mental health services. Other services will include (but are not limited to):

- Case Management
- Substance Abuse Treatment
- Outpatient Health Services
- Rental Assistance

**Administration**

Fifteen percent of the allocation is set aside for costs of overall HOME-ARP program management, coordination, monitoring, and evaluation. Expenditures may include salaries, wages, and related costs of the LSRHC's staff and/or administrative services performed under third-party contracts or agreements.

**Nonprofit Operating Assistance**

LSRHC will use the 5% allowance for Nonprofit Operating Assistance to pay operating expenses of CHDOs and other nonprofit organizations that will carry out activities with HOME-ARP funds. Eligible costs include salaries for new hires and other employee compensation and benefits, costs related to employee training, or other staff development.

***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 community needs and gap analysis showed that there is a gap in the homelessness response system for supportive services, permanent affordable housing, and non-congregate emergency shelter facilities. The LSRHC has identified activities that will assist individuals and families of the most vulnerable qualified populations. There are significant needs throughout the region for each of the HOME-ARP eligible activities, and the lack of affordable housing, in particular, was emphasized by most stakeholders.

One of the major gaps in the LSRHC's homeless inventory is access to affordable housing. Households experiencing a housing crisis or fleeing an unsafe situation need to find a place to stay quickly. Access to this type of housing is a current gap in the system. Emergency shelter and bridge housing can help to fill this gap and strengthen the crisis response system; however, there is a limited capacity within the region to operate an NCS at the appropriate level.

Separate from the need for housing, there is a high need for assistance to reduce housing instability, which includes providing mental health treatment, job development, legal aid, and other supportive services. There are gaps in our service delivery system for our homeless population who have high mental health needs, including those who struggle with substance abuse. Feedback also shows that there is a need to strengthen the regional crisis response system to connect those experiencing homelessness or at risk of homelessness with housing quickly, and provide services when needed. Case management and mental health were highlighted as unmet needs. Based on the input received from service providers and the data collected, we are allocating a portion of funding to supportive services.

### **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:***

LSRHC estimates nine new rental units throughout the region will be produced using HOME-ARP funds that will provide direct support to the qualifying populations in the region.

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

The needs assessment highlighted the lack of affordable housing for the qualifying populations as well as a gap in shelter units and supportive services to assist QPs who are homeless or at-risk of homelessness. The HOME-ARP funds allow the LSRHC to take advantage of this one-time allocation to provide more long-term solutions for QPs with the development of rental housing and NCS units, while also having funding to support immediate needs by providing McKinney-Vento and homeless prevention related supportive services to those QPs in need of those support lines. Affordable rental housing projects financed with HOME-ARP will be combined with other funding resources in order to leverage other financing tools and maximize unit production.

### **Preferences**

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

The LSRHC will not provide preferences to any population or subpopulation.

### **HOME-ARP Refinancing Guidelines**

The LSRHC does not intend to refinance existing debt secured by multifamily rental housing.

## Appendix: HOME-ARP Definitions

### Qualifying Populations

#### 1. Homeless, as defined in 24 CFR 91.5 Homeless (1), (2), or (3):

(1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(2) An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);



(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;

## **2. At risk of Homelessness, as defined in 24 CFR 91.5 *At risk of homelessness*:**

(1) An individual or family who:

(i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;

(ii) Does not have sufficient resources or support networks, *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “Homeless” definition in this section; and

(iii) Meets one of the following conditions:

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(l) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(l)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as “homeless” under this section but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

**3. Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD. (Domestic violence/ Dating violence/ Sexual assault/ Stalking defined in [24 CFR 5.2003](#); Human Trafficking includes both sex and labor trafficking, as outlined in the Trafficking Victims Protection Act of 2000 (TVPA), as amended (22 U.S.C. 7102).)**

**4. Other Populations where providing supportive services or assistance under section 212(a) of NAHA ([42 U.S.C. 12742\(a\)](#)) would prevent the family’s homelessness or would serve those with the greatest risk of housing instability.** HUD defines these populations as individuals and households who do not qualify under any of the populations above but meet one of the following criteria:

(1) **Other Families Requiring Services or Housing Assistance to Prevent Homelessness** is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in [24 CFR 91.5](#), are currently housed due to 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.

(2) **At Greatest Risk of Housing Instability** is defined as household who meets either paragraph (i) or (ii) below:

(i) 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);

(ii) 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 following conditions from paragraph (iii) of the “At risk of homelessness” definition established at [24 CFR 91.5](#):

(A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan

### **Eligible Activities**

HOME-ARP funds can be used for four eligible activities:

1. Production or Preservation of Affordable Housing
2. Tenant-Based Rental Assistance (TBRA)
3. Supportive Services, including services defined at 24 CFR 578.53(e), Homeless Prevention Services, and Housing Counseling

4. Purchase and Development of Non-Congregate Shelter. These structures can remain in use as non-congregate shelter or can be converted to: 1) emergency shelter under the [Emergency Solutions Grants \(ESG\) Program](#); 2) permanent housing under the [Continuum of Care \(CoC\) Program](#); or 3) affordable housing under the [HOME Program](#).

#### **A. Administration and Planning**

The PJ may expend, for payment of reasonable administrative and planning costs, up to 15 percent of its HOME-ARP allocation. Reasonable administrative and planning costs for the HOME-ARP program include:

1. Reasonable costs of overall HOME-ARP program management, coordination, monitoring, and evaluation.
2. Staff and overhead costs of the PJ directly related to carrying out a HOME-ARP project, in accordance with 24 CFR 92.207(b).
3. The provision of information and other resources to residents and citizen organizations participating in the planning, implementation, or assessment of projects being assisted with HOME-ARP funds.
4. Activities to affirmatively further fair housing (AFFH) in accordance with 24 CFR 5.151 and the PJ's certification as required under HUD's Notice and 24 CFR 5.152. The AFFH definition in HUD's Interim Final Rule entitled, "Restoring Affirmatively Furthering Fair Housing Definitions and Certifications" (86 FR 30779, June 10, 2021), as amended, at 24 CFR 5.151, and the AFFH certification requirement, at 24 CFR 5.152, available at <https://www.federalregister.gov/documents/2021/06/10/2021-12114/restoring-affirmatively-furthering-fair-housing-definitions-and-certifications>.
5. Indirect costs may be charged to the HOME-ARP program under a cost allocation plan prepared in accordance with 2 CFR part 200, subpart E, as amended.
6. Preparation of the HOME-ARP allocation plan as required in HUD's Notice. Preparation includes the costs of public hearing, consultations, and publications.
7. Costs of complying with the applicable Federal requirements in 24 CFR part 92, subpart H. Project-specific environmental review costs may be charged as administrative or project costs in accordance with 24 CFR 92.206(d)(8) and is at the discretion of the PJ.

#### **B. HOME-ARP Rental Housing**

HOME-ARP funds may be used to acquire, rehabilitate, or construct affordable rental housing primarily for occupancy by households of individuals and families that meet the definition of one or more of the qualifying populations described in Section IV.A of HUD's Notice ("**qualifying households**"). Unlike the regular HOME Program, which targets HOME-assisted rental units based on tenant income, 70 percent of all HOME-ARP units will admit households based only

upon their status as qualifying households. This complicates the underwriting and operation of projects that include HOME-ARP units. As a result, the requirements for HOME-ARP rental housing provide significant flexibilities to enable HOME-ARP rental projects to remain financially viable and affordable for the qualifying populations throughout the minimum compliance period.

Eligible HOME-ARP rental housing includes “housing” as defined at 24 CFR 92.2, including but not limited to manufactured housing, single room occupancy (SRO) units, and permanent supportive housing. Emergency shelters, hotels, and motels (including those currently operating as non-congregate shelter), facilities such as nursing homes, residential treatment facilities, correctional facilities, halfway houses, and housing for students or dormitories do not constitute housing in the HOME-ARP program. However, HOME-ARP funds may be used to acquire and rehabilitate such structures into HOME-ARP rental housing.

### **C. Tenant-Based Rental Assistance (TBRA)**

HOME-ARP funds may be used to provide tenant-based rental assistance to qualifying households (“HOME-ARP TBRA”). In HOME-ARP TBRA, the PJ assists a qualifying household with payments to cover the entire or insufficient amounts that the qualifying household cannot pay for housing and housing-related costs, such as rental assistance, security deposits, and utility deposits. HOME-ARP TBRA assisted households may choose to rent a unit in a HOME-ARP rental project or any other eligible rental unit. HOME-ARP TBRA is a form of rental assistance that is attached to the household and not a particular rental unit. Therefore, the HOME-ARP TBRA assisted household may choose to move to another unit with continued HOME-ARP TBRA as long as the new unit meets the applicable property standards of HUD’s Notice. If a HOME-ARP TBRA assisted household chooses to move, the rental assistance contract terminates and a new rental assistance contract for the new unit will be executed according to HOME-ARP TBRA requirements. The HOME-ARP TBRA assisted household must notify the PJ before moving in order to receive continued HOME-ARP TBRA.

### **D. Acquisition and Development of Non-Congregate Shelter**

A non-congregate shelter (NCS) is one or more buildings that provide private units or rooms as temporary shelter to individuals and families and does not require occupants to sign a lease or occupancy agreement. HOME-ARP funds may be used to acquire and develop HOME-ARP NCS for individuals and families in qualifying populations. This activity may include but is not limited to the acquisition of land and construction of HOME-ARP NCS or the acquisition and/or rehabilitation of existing structures such as motels, hotels, or other facilities to be used for HOME-ARP NCS. HOME-ARP funds may not be used to pay the operating costs of HOME-ARP NCS. Consequently, PJs must consider the availability of ongoing operating funds for the HOME-ARP NCS so that the HOME-ARP NCS can remain viable through the restricted use period specified in HUD’s Notice.

### **E. Supportive Services**

HOME-ARP funds may be used to provide a broad range of supportive services to qualifying individuals or families as a separate activity or in combination with other HOME-ARP activities.

Supportive services include: a) services listed in section 401(29) of the McKinney-Vento Homeless Assistance Act (“**McKinney-Vento Supportive Services**”)1 (42 U.S.C. 11360(29)); b) homelessness prevention services; and c) housing counseling services.

#### **F. Nonprofit Operating and Capacity Building Assistance**

A PJ may use up to 5 percent of its HOME-ARP allocation to pay the operating expenses of CHDOs and other nonprofit organizations that will carry out activities with HOME-ARP funds. A PJ may also use up to an additional 5 percent of its allocation to pay eligible costs related to developing the capacity of eligible nonprofit organizations to successfully carry out HOME-ARP eligible activities.

PJs may award operating expense assistance or capacity building assistance to a nonprofit organization if it reasonably expects to provide HOME-ARP funds to the organization for any of the eligible HOME-ARP activities within 24 months of the award.

**NOTE:** See the HUD Notice: CPD-21-10 Subject: Requirements for the Use of Funds in the HOME-American Rescue Plan Program for more details and restrictions to these activities.

## **HOME-ARP Allocation Plan**

PJs develop annual action plans as part of their application for HOME funding. To receive its HOME-ARP funds, a PJ must engage in consultation and public participation processes and develop a HOME-ARP allocation plan that meets the requirements established in the HOME-ARP Notice and submit it to HUD as a substantial amendment to its Fiscal Year 2021 annual action plan. The HOME-ARP allocation plan must describe how the PJ intends to distribute HOME-ARP funds, including how it will use these funds to address the needs of HOME-ARP qualifying populations. A PJ's HOME-ARP allocation plan must include:

- A summary of the consultation process and results of upfront consultation;
- A summary of comments received through the public participation process and a summary of any comments or recommendations not accepted and the reasons why;
- A description of HOME-ARP qualifying populations within the jurisdiction;
- An assessment of unmet needs of each qualifying population;
- An assessment of gaps in housing and shelter inventory, homeless assistance and services, and homelessness prevention service delivery system;
- A summary of the planned use of HOME-ARP funds for eligible activities based on the unmet needs of the qualifying populations;
- An estimate of the number of housing units for qualifying populations the PJ will produce or preserve with its HOME-ARP allocation; and
- A description of any preferences for individuals and families in a particular qualifying population or a segment of a qualifying population.

All the above required elements of the HOME-ARP allocation plan shall be part of the FY 2021 annual action plan for purposes of the HOME-ARP program. Consequently, PJs are not required to amend their consolidated plans.

## **Preferences**

The HOME-ARP allocation plan must 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. For example, PJs may include a preference for:

- homeless individuals and families as defined in the ESG and CoC programs;
- individuals with special needs or persons with disabilities among qualifying individuals and families;
- a specific category of qualifying individuals and families (e.g., chronically homeless as defined in 24 CFR 91.5).

PJs are not required to describe specific projects to which the preferences will apply in the HOME-ARP allocation plan. However, a PJ must explain how the use of a preference or method of

prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis. The PJ must also describe how it will still address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in a preference through the use of HOME-ARP funds.

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.

### **HOME-ARP Refinancing Guidelines**

If a PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, it must state its refinancing guidelines in accordance with 24 CFR 92.206(b)(2). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project. At a minimum, the guidelines must:

- 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.
- 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.
- State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
- Specify whether the required compliance period is the minimum 15 years or longer.
- State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.



## Supporting Documents