

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: City of Elizabeth, NJ

Date: 12/20/2021

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:

The City partners with non-profits organizations in the delivery of its CDBG and HOME annual allocations. Several were consulted with during the development of the HOME-ARP Allocation Plan. These consulted entities provide housing and services to the eligible populations of the HOME-ARP program on an on-going basis and have relevant knowledge on the needs, service gaps, and potential activities that would best benefit qualified populations. Entities consulted

include those who work with families or individuals experiencing homelessness, are at-risk of homelessness, and other vulnerable qualifying populations such as veterans.

In the development of the allocation plan, the City consulted with stakeholders and asked for their input concerning the HOME-ARP grant, eligible activities, and the proposed budget. Entities articulated their gap in services and housing needs by providing written and verbal comments. The following table summarizes the feedback received.

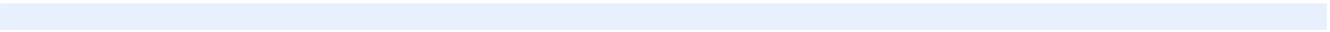
The City will continue to meet with entities throughout the implementation of the HOME-ARP activities in an effort to assess the ongoing needs of our community and will continue to work together to develop strategies that will help address chronic homelessness.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Housing Authority of City of Elizabeth	Public Housing Authority	Email correspondence	Increase funding to expand and preserve the supply of affordable housing; expand funding for affordable senior housing programs
Elizabeth/Union County CoC	Continuum of Care	Email correspondence/ Phone	Increase in affordable housing in the area; Increase availability of shelter beds, transitional housing, long-term affordable housing, and housing for seniors and individuals with disabilities
Gateway Family YMCA	Nonprofit Homeless	Email correspondence	Create and maintain low-income rental housing opportunities; Availability of more Section 8 or other subsidies in the area; Provide incentives for developers like tax-credits, etc.
Veterans Services Union County	Nonprofit Homeless	Email Correspondence	Immediate placements for veterans facing homelessness; housing priority for female veterans facing homelessness; case management opportunities for veterans after housing placement.
YWCA	Nonprofit Domestic Violence	Nonprofit Domestic Violence	Nonprofit Domestic Violence
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.

Elizabeth Coalition to House the Homeless	Nonprofit Homeless	Email Correspondence & video conferencing	Creating housing opportunities for lower income households who do not meet the income limit but still struggle to afford basic housing in the Elizabeth area.
Family Promise of Union County	Nonprofit Homeless	Email correspondence	Create and maintain safe and affordable rental housing opportunities; Provide TBRA to low-income households; Preserve decent, safe, and affordable owner-occupied housing

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



Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive,
- The range of activities the PJ may undertake.

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

- ***Public comment period: start date - 12/22/2021 end date – 1/6/2022***
- ***Public hearing: 12/28/2021***

The City posted a public notice on December 20, 2021 announcing the availability of the plan for public comment and the planned public hearing on the use of the funds. As required, the notice provided the amount of HOME-ARP funds expected to be received and the range of activities that the City can undertake.

Describe any efforts to broaden public participation:

The City of Elizabeth followed its adopted Citizen Participation process, except that the length of the public comment period was shortened to 15 days as allowed by HUD guidance.

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:

At the time of this writing, the City has not received any public comments outside of the consultation process with the public service agencies and other stakeholders such as the public housing authority.

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

At the time of this writing, the City has not received any comments or recommendations that were not accepted.

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	299	248	73	0	3								
Transitional Housing	83	0	48	0	0								
Permanent Supportive Housing	171	120	131	102	12								
Other Permanent Housing						0	48	44	16				
Sheltered Homeless						51	73	3	25				
Unsheltered Homeless						0	14	0	0				
Current Gap										#	#	#	#

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

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	30,530		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,170		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,985		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		6,140	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,835	
Current Gaps			7,975

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

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

The City utilized the most recent Comprehensive Affordability Strategy (CHAS) data set provided by HUD. This data was based on the 2014-2018 American Community Survey data.

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

- ***Sheltered and unsheltered homeless populations;***
- ***Those currently housed populations at risk of homelessness;***
- ***Other families requiring services or housing assistance or to prevent homelessness;***
and,
- ***Those at greatest risk of housing instability or in unstable housing situations:***

The current housing situation in the City is dire for extremely-low income renters. In addition to the on-going housing and employment issues related to COVID, the City's affordable housing stock was damaged by the remnants of Hurricane Ida in September 2021. Damages to the Oakwood Plaza affordable housing complex was so extensive that all residents were relocated into alternate housing until the units can be refurbished.

While a number of state, federal, and local resources have been provided to address the effects of COVID and Hurricane Ida, these funds will be available for a limited duration and it is unclear what the situation will look like once the funding expires.

According to the 2014-2018 CHAS data displayed above, there is a gap of 7,975 affordable housing units for households earning less than fifty percent of area median income (AMI). It is expected that the true gap is higher based on increased demand for housing in the last few years. The lack of affordable housing is consistently the number one unmet need in recent planning studies. This includes shortages of emergency shelter and transitional housing beds, long term affordable housing, and housing for seniors and persons with disabilities.

In consultations with local service providers working on homeless prevention efforts for both this allocation and the City's 2020 update to the Consolidated Plan, agencies noted a marked increase in the number of families and single person households needing lower cost housing. In recent years, each City-funded homeless assistance agency provided service to approximately 500 clients. Half of the clients currently serviced are receiving SSI or SSD. This income is not enough to afford market-rate rent.

In addition to households that will require on-going assistance to achieve housing affordability, there are other families who suffer a temporary loss or reduction of income that places them at-risk of homelessness. Especially during the massive caseloads of unemployment due to COVID, a household filing for unemployment may need to wait a significant period of time, up to eight weeks, to receive assistance close to half of what they were making through employment.

According to the latest homeless Point in Time Count, there were 288 households sheltered in emergency shelter and transitional housing. There was an additional 60 households that were considered unsheltered. Of those, 17 were considered to be chronically homeless. While shelter remains the number one issue confronting residents, additional supportive services are often needed to stabilize the household. Such services include food, mental health, and case management services.

Based on data from the Continuum of Care, African Americans are more likely than the general population to suffer from poverty and homelessness. While African Americans account for twenty percent of the population, they account for 28% of the population living in poverty and represent 57% of the sheltered homeless population.

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:

The following grants and resources are geared towards assisting qualifying populations:

- Social Services for the Homeless (SSH),
- Community Service Block Grant (CSBG),
- Emergency Solutions Grant (ESG),
- SuperNOFA (Notice of Funding Availability),
- Community Development Block Grant (CDBG),
- Supplemental Security Income (SSI)/Social Security Disability Insurance (SSDI),
- General Assistance (GA)/ Emergency Assistance (EA),
- Tenant-Based Rental Assistance (TBRA),
- Temporary Rental Assistance (TRA), and
- Temporary Aid for Needy Families (TANF).

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

The following activities were recommended to address gaps in the current system. In the short-term, the CoC recommends:

1. Create a working group to focus on homelessness and implement a system of services for homeless individuals and families;
2. Establish a single point of intake and service routes for homeless services;
3. Create Housing First strategies and homeless prevention in addition to crisis-based services;
4. Consider implementing best practices from within other areas of New Jersey (Mercer County) and nationally (Denver, Colorado);
5. Utilize a unified, consistent approach to shelter development among faith-based providers;
6. Review the use of the Homeless Trust Fund in the context of emerging strategies.

In the long term, the following strategies are recommended:

1. Engage in government agencies and stakeholders at all levels, including federal, state, and municipal officials, as well as private sector actors such as developers and landlord confront and resolve the many challenging issues identified in the Community Needs Assessment (CNA) related to affordable housing and income disparities.

It has been noted that increasing access to existing resources for eligible populations to ensure that they receive benefits will help address the overall need of stability for qualifying populations. Steps to increasing access include the following actions:

1. Educating the community on the availability of SNAP, Work First NJ, Medicaid, and Family Care (including Children’s Health Insurance Program/CHIP), EITC, Child Care Tax Credits, etc.
2. Enhance the likelihood that customers will access services by providing them in a customer-friendly manner at DSS; this requires improving the customer service skills of DSS employees.
3. Increase the accessibility of online applications for these services at locations across the county, especially in Family Success Centers and libraries.
4. Establish “Financial Empowerment Centers” in the county to support residents accessing these and other financial support services, such as VITA, EITC, first time homeowner programs, financial planning and other related services.
5. Explore and launch entrepreneurship and small business development initiatives, such as a small business incubator, and the development of entrepreneurship curriculum, possibly with the community college.
6. Continue to focus on resident access and utilization of services and supports available to help them to address their desires to attain better paying jobs, funding available for education/training, etc.

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:

The City does not plan to formally adopt a definition of “other populations”.

Identify priority needs for qualifying populations:

For homeless populations, priority needs include rapid re-housing and supportive services to achieve housing stability.

For extremely-low income households, priority needs include the creation of additional rental units affordable to families with less than 30% of area median income and permanent supportive housing.

For low-income households and households at risk of homelessness, priority needs include increased homeless prevention, tenant-based rental assistance coupled with supportive services to help achieve housing stability.

In terms of supportive services, general needs for all types of qualifying populations include transportation to meet basic needs, such as food, and health care. The Continuum of Care also noted a need for more resources to treat mental health issues and substance abuse.

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

The Continuum of Care held a Community Needs Assessment (CNA) survey in 2020, which assessed the shelter and housing inventory and services delivery systems throughout the County. This information gathered from surveys and focus groups help drive the data and indicate the current needs of the area. The City supplemented this information with the required consultations, including the Housing Authority of the City of Elizabeth and other local stakeholders.

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 City expects to administer programs directly. When a program is outside the capacity of City staff, the City will conduct a Request for Proposals similar to its existing process for CDBG and HOME allocations. This process is open to all qualified non-profit service providers.

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

Not applicable. The City did not use HOME-ARP administrative funds to procure a subrecipient or contractor to prepare the HOME-ARP allocation plan. The City did receive limited assistance from a grants management consultant procured before the announcement of HOME-ARP funds. This consultant, Usona Development LLC, will be paid from general funds.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating

assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 671,668.60		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 2,182,922.95		
Development of Affordable Rental Housing	\$ 0		
Non-Profit Operating	\$ 0	# %	5%
Non-Profit Capacity Building	\$ 0	# %	5%
Administration and Planning	\$ 503,751.45	15 %	15%
Total HOME ARP Allocation	\$ 3,358,343.00		

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 current amount of unmet need is greater than the amount of resources available to meet those needs by several orders of magnitude. The historical average development cost for HOME-assisted units funded by the City is approximately \$175,000. Using this conservative number and the current gap identified above, the total cost to meet the gap in affordable housing totals \$1.3 billion dollars, which is over 400 times the amount of funding available through HOME-ARP.

The City proposes to use HOME-ARP for a combination of Tenant-Based Rental Assistance (TBRA), supportive services, and planning activities. Using an estimated average investment of \$25,000 per household, the City estimates it can assist up to 114 homeless or at-risk of homelessness with rental assistance and supportive services designed to increase housing stability. The planning portion of the budget will be used to carry out the proposed actions described above to coordinate other resources, including private investment, to address the shortage of affordable housing units.

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 the estimates provided above, the City estimates it can directly assist 114 households with HOME-ARP funding.

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:

Based on the current budget, the City will not use HOME-ARP funds for affordable rental housing production. Instead, the City will provide a combination of rental assistance and supportive services in order to stabilize homeless and at-risk populations.

Preferences

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

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

The City expects to provide preferences for those affected by Hurricane Ida. These households were stably housed before the hurricane and should require minimal assistance to regain housing stability.

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

Those at risk of homelessness due to the affects of Hurricane Ida should require a relatively smaller amount of investment to achieve housing stability. If left unaddressed, this population will threaten to dramatically increase the demand of services of local service providers which will have a detrimental effect on all potential beneficiaries.

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

Many of the challenges currently faced by the City and its partners in providing affordable housing is related to coordination and public policy challenges. Through supporting further planning efforts to address these challenges, the HOME-ARP funds will indirectly benefit all qualifying populations served by the Continuum of Care and those low-income households affected by the lack of affordable housing.

HOME-ARP Refinancing Guidelines

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

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***
Not applicable. The City does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***
Not applicable. The City does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
Not applicable. The City does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
Not applicable. The City does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
Not applicable. The City does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.
- ***Other requirements in the PJ's guidelines, if applicable:***
Not applicable. The City does not plan to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.