

North Country HOME Consortium
DRAFT
HOME-American Rescue Plan Program (ARP)
Allocation Plan

*Substantial Amendment to the North Country HOME Consortium FY
2021 Annual Action Plan*

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

Jefferson County staff, with assistance from Development Authority of the North Country staff, as the subrecipient, began the consultation process in March 2022. Over the course of the next 10 months, on-going outreach continued with service providers across the three-county North Country HOME Consortium. The following outlines the methods and dates of consultation.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Points North Housing Coalition	CoC	Phone Call Presentation at Meeting	Mentioned the need for warming centers and temporary housing. Provided HMIS/HIC data. Utilized HIC and HMIS data collected by CoC. DANC staff presented to PNHC regarding HOME ARP funds. Each of the three counties are working outside of the PNHC forming their own subcommittees to identify homeless issues in their counties. They were interviewed as part of this plan.
CARES of NY, Inc.	Staff support to CoC	Phone Call	Provided feedback on CE process. Noted that based on their discussions with CoC they thought there was a need for temporary shelters and warming centers.
Transitional Living Services	Behavioral Health, Supportive Services, Residential Services	Zoom meeting	Rehabbing existing building creating 18 rooms for homeless in Watertown as temporary transitional housing/SRO. Need for ongoing operational funds.
Neighbors of Watertown	Rural Preservation Corporation; affordable rental housing	Zoom meeting	Working with Transitional Living Services and CREDO to look at 30 unit permanent supportive housing and 30 low income housing units in Watertown. There has been a decline in emergency and low barrier housing. This has taken a lot of low-income, affordable housing units off-line.
CREDO	Substance abuse, mental health	Zoom meeting	Working with Transitional Living Services and Neighbors of Watertown to develop 30 unit permanent supportive housing and 30 low income units in Watertown.

Jefferson County: Dept. of Community Services	County Government	Zoom meeting	Participates on Jefferson County Homeless Project Steering Committee, No comments
Urban Mission	Supportive services and advocacy for those struggling with generational poverty, substance abuse, domestic violence, mental health, homelessness.	Zoom meeting	Participates on Jefferson County Homeless Project Steering committee. Gathering information on homeless needs/issues in Jefferson County and working with group to identify strategies. Supports Bridge Program, CARE Center, critical support, food pantry, Getting Ahead program, housing assistance, Impossible Dream store, and Meals on Wheels; conducts 'point in time' survey for CoC. Could use additional funding for above referenced programs.
Jefferson County: Dept. of Social Services	County Government	Zoom Meeting/Call	Appears to be a need for rapid-rehousing funds in Jefferson County. County lost its STEHP funding and will reapply in 2024. Also noted that there is a need for supportive services and housing counseling.
S.T.E.P. by S.T.E.P. Inc.	Homeless housing	Call/Email	Noted a need for emergency housing and supportive needs as there is a long list for the Housing Choice Voucher Program.
Massena Housing Authority	Public housing	Email	During Covid, our waiting list numbers were at an all-time low. After the eviction moratorium was lifted, we began receiving a dramatic increase in calls for "emergency" housing and applications. Sadly, many of the applications have very poor landlord references because although income remained steady (or increased) during Covid, tenants chose not to pay rent because there was no recourse. Once that restriction was lifted and ERAP funds dried up, landlords (including the MHA) began the process of evicting tenants who did not pay. You may be aware, in NYS, public housing authorities were not eligible to receive ERAP funding, although we were still bound by the eviction moratorium (even though our rent is based on income and thus would decrease in the event of a loss

			or decrease in income.) We did experience a significant number of tenants who declined to pay rent during the moratorium. I am honestly not sure if the lack of affordable housing is the problem in the community of Massena, but landlords who suffered severe economic losses during Covid are now being particularly selective in their screening process, and tenants who were led to believe they could choose not to pay rent are now unprepared to deal with the consequences of their actions because no one told them what would happen if they didn't pay.
Lewis County Opportunities	Section 8 voucher administrator	Telephone	Need for additional emergency food and shelter funds, permanent supportive housing, and counseling for life skills.
Renewal House	Domestic Violence Services	Telephone	Need for additional short term rental assistance/security deposit funding
Veteran's Outreach Center	Programs and Services for Veterans	Telephone	Need for financial and housing counseling for soldiers coming out of the Army; new affordable housing would be helpful
Victim's Assistance Center	Domestic Violence Victims/Survivors	Telephone	No need for additional beds at this time. Seeing requests for referrals from other counties for beds. Funding needed for case management and child advocacy.
St. Lawrence County Planning Dept.	County government, affordable housing	Telephone	Need for additional affordable housing in County. Rents increasing as well as the purchase price for housing. Affordability an issue in county. Anecdotal stories about couch-surfing and unsheltered homelessness.
United Way	Community Services Organization	Telephone	Executive Director is lead for the Jefferson County Homeless Housing Task Force. Provided information on data collected by the committee to be used in the report. Identified need for supportive services, affordable housing, and warming center.

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

The Points North Housing Coalition, the Continuum of Care, and CARES of NY, Inc, the contract organization that provides staffing for the CoC, were interviewed throughout the Plan process. The HIC and HMIS data came from the CoC and CARES staff assisted with compiling the data. Reports were given to the CoC on the HOME ARP funding on multiple occasions. Each of the three counties formed separate county-level working groups on homeless housing. These groups were interviewed in March 2022. CARES was interviewed on several occasions and assisted with feedback on the coordinated entry process. They also thought based on what they were hearing that there was a need for temporary shelters and warming centers in the region.

On March 31, 2022 representatives from Jefferson County, as Lead Entity, and Development Authority of the North Country, as Subrecipient, held a Zoom meeting with social service agencies providing services in Lewis and St. Lawrence Counties to discuss the HOME ARP funding. Two meetings were held: one with St. Lawrence County service providers and another one immediately after with Lewis County reps. The St. Lawrence County Planning Office, Step by Step, Massena Independent Living, North Country Housing Council, and United Helpers participated during the St. Lawrence County meeting. Snowbelt Housing, Lewis County Planning Office, Transitional Living Services, and Lewis County Dept. of Social Services participated in the Lewis County meeting. Both counties had similar comments and concerns. St. Lawrence County saw a need for emergency, temporary housing with supportive services, and additional Housing Choice Vouchers. Lewis County also saw a need for a warming shelter and emergency, temporary shelters. Lewis County noted that they needed better affordable housing stock and landlords willing to work with service providers. They also see a need for supportive, non-congregate housing units or SRO's. All felt that there needs to be supportive services to address the issues that are affecting many of the homeless individuals.

On May 5, 2022, representatives from Jefferson County, as Lead Entity, and Development Authority, as Subrecipient, held a Zoom meeting with social service agencies providing services in Jefferson County to discuss the HOME ARP funding. The Jefferson County Planning Office, CREDO, Transitional Living Services, Jefferson County Dept. of Social Services, Watertown Urban Mission, Neighbors of Watertown, North Country Family Health, CHJC, City of Watertown Planning Office, and Northern Regional Center for Independent Living participated in the meeting. Jefferson County has seen an increase in homelessness over the last two years. Several properties (ie motels) that rented to very low income through DSS either closed or burned down reducing the availability of temporary shelter. In addition, several private rental housing properties were condemned. This forced many people out of their shelter. There are no readily available solutions for temporary housing. The Jefferson County Homeless Project Steering Committee comprised of human services providers and government officials was started to address these concerns. A plan from the committee is due in early 2023 with recommendations. A temporary shelter/SRO is proposed to open in December by Transitional Living Services. Neighbors of Watertown/TLS/Credo are proposing a permanent supportive housing project in Watertown. Jefferson County lost its STEHP funding.

July 13, 2022, representative from Development Authority of the North Country met with public housing authorities to discuss HOME ARP funding. The Watertown, Canton, Ogdensburg, Potsdam, Town of Wilna and West Carthage Housing Authorities participated in the meeting. The PHA's all shared that they took serious financial hits with the loss of rental income during the eviction moratorium and that the Landlord Relief funds that were made available to private landlords were not made available to PHA's. The Watertown Housing Authority noted that they lost about \$500,000 in rental income. Also, they have not been able to turn these units.

November 8, 2022, representative from the Development Authority met with Maureen Cean, Executive Director of Transitional Living Services of NNY. Discussed how the community lost several properties that filled a gap providing shelter for the most vulnerable populations. Several were motels that either closed, burned down, or were condemned. Others were private properties condemned for violations. Discussed the need for supportive services and permanent supportive housing for all qualifying populations. Ms. Cean will work with DANC to fact check the HMIS/HIC data as well.

December 12, 2022, representatives from the Development Authority met with the Lewis County Planning Director and the Executive Director for Snowbelt Housing, a Rural Preservation Corporation. Snowbelt facilitates the state's Housing Choice Vouchers for Lewis County. Currently, Lewis County does not have any ESSHI funding, however is applying for ESSHI for a proposed permanent supportive housing project in Lowville. They mentioned that there is not a waiting list for vouchers. They feel that there is a need for funding for supportive services and training to provide such services.

December 19, 2022, representative from the Development Authority spoke with Anne Kalamas with the Jefferson County Department of Social Services. Jefferson County DSS oversees the Coordinated Entry process for the Points North Continuum of Care. She noted that of great concern is those that are rent overburdened. Rapid Re-housing funding or funds that can be used for that purpose are needed. She also stated that there is a need in Jefferson County for non-profit capacity building to train staff to be able to provide supportive services.

December 22, 2022, representative from the Development Authority spoke with Scott Mathys with Lewis County Opportunities. LCO administers the Section 8 voucher program for Jefferson and Lewis Counties, as well as several other programs in Lewis County. He noted that the greatest need is for emergency food and shelter funds and permanent supportive housing. He said that there are several proposed projects but they are still under development. He felt that preferences should be given for homeless, at-risk of homeless, those fleeing domestic violence, and the other populations.

January 9, 2023, representative from the Development Authority spoke with Shari Fawcett with Renewal House. Renewal House provides services for victims of domestic violence in St. Lawrence County. It operates a 9-bed safe house. During COVID, their beds were full and they

had to refer clients to other housing providers, sometimes out of the county. In my conversation with her she noted that rents have increased in the county. They have a need for short term rental assistance and funds for security deposits to help victims/survivors afford safe, affordable housing. They receive Family Violence Prevention & Services Act funds and were able to use them for short term rental assistance during COVID. They no longer have that ability. They do not have any plans to add beds at this time.

January 17, representative from Development Authority spoke with Lilly Ruiz from the CNY Veteran's Outreach Center. She has seen younger Soldier's coming out of the Army struggle with finding affordable housing, jobs and managing their finances. Some of this is due to the fact that the Army provides certain structure and housing that when they leave, are not prepared to apply for a job or budget for housing. They find themselves in arrears on rent and 'couch surfing' among friends because they cannot afford the housing. Additional affordable housing would benefit the veteran community in the area, especially for younger soldiers coming out of the Army.

January 18, representatives from PJ and Development Authority attended the Jefferson County homeless housing summit. The summit provided statistics and demographics for homeless in the County and presented recommendations for addressing issues. Recommendations included: a warming center (opened in December 2022); an Emergency Response Program with ancillary materials/equipment; Pallet Community Center; development of affordable housing and supportive housing units; and legislation to support homeless housing initiatives. Participants noted a need for additional tenant based rental assistance, short-term rental assistance, and assistance with arrears and utilities. There continues to be a labor shortage for certain positions in supportive services programs/providers.

January 20, 2023-representative from Development Authority spoke with the Executive Director of the Victim's Assistance Center in Watertown. The VAC provides services to victims and survivors of domestic violence. They have a child advocacy program in Jefferson, Lewis and St. Lawrence Counties. She noted that there needs to be a plan to change the life circumstances for victims of domestic violence. Funding is needed for case management.

January 23, 2023-representative from Development Authority spoke with John Tenbusch with the St. Lawrence County Planning Office. He also sits on a homeless housing task force in St. Lawrence County. He noted that the task force has met several times. Their current focus is on the need for warming centers especially in Massena and Ogdensburg. Anecdotal stories about unsheltered homeless throughout the County and couch-surfing. Hard to accurately count the figures for homeless or at-risk of homeless in the County. There is a need for additional affordable housing. The County ended its Homebuyer Assistance Program as it was difficult to identify homes in a price range that low-income households could afford even with funding assistance. Rents are also increasing making renting unattainable for many. There are also not a lot of good places to place individuals with vouchers.

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

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

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

Template:

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

- ***Date(s) of public notice: 2/11/2023***
- ***Public comment period: start date - 2/13/2023 end date - 2/27/2023***
- ***Date(s) of public hearing: 2/22/2023***

Describe the public participation process:

Enter narrative response here.

Describe efforts to broaden public participation:

Enter narrative response here.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

Enter narrative response here.

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

Enter narrative response here.

Needs Assessment and Gaps Analysis

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

The North Country HOME Consortium is comprised of participating municipalities in Jefferson, Lewis, and St. Lawrence Counties, NY. The combined population of the three counties based on the 2020 Census was 251,808. The region is relatively rural with 48.21 persons per square mile in 2020. The largest population centers are the cities of Watertown and Ogdensburg. 7.5% of the population is comprised of veterans. The poverty rate in the three counties (Jefferson, 12.4%, Lewis, 12.6%, and St. Lawrence, 15%) is slightly higher than the U.S. rate of 11.6%. The median household income per the 2021 ACS was \$60,049 for Lewis, \$54,351 for St. Lawrence, and \$58,271 for Jefferson County which is less than the US MHI of \$69,021. On average, 10.7% of the population under the age of 65 has a disability. This is higher than the US average of 8.7%.

On average, 92.6% of the population in the Consortium is characterized as White alone. Only 3.3% is characterized as Black or African American alone, 1.13% as Asian alone, and .7% as American Indian and Alaska Native only. 89.7% of the population is characterized as White Alone, not Hispanic or Latino.

The most recent one-day homeless count that we have data for was conducted in January 2022. The Consortium used PIT, HIC, HMIS, CHAS, ACS, and local data to determine where the needs in the community were, and also used interviews and the consulting meeting to gather input. The most recent HMIS report completed by the Continuum of Care was for 10/1/2020-9/30/2021. The Continuum of Care has the same geographic area as the Consortium-Jefferson, Lewis and St. Lawrence Counties, NY.

Homeless as defined in 24 CFR 91.5

The most recent one-day homeless count identified 1 family household with at least 1 child as sheltered homeless, and 108 adult households with no children as sheltered homeless. There were 3 veterans and 6 victims of domestic violence identified in sheltered housing. The greatest need was for adult households with no children as 15 were identified as unsheltered homeless. There were 4 victims of domestic violence counted as unsheltered homeless.

Of the 108 adult households with no children identified as sheltered homeless, 102 were persons in emergency shelters and 6 were in transitional shelters. Ten were between the ages of 18-24. Of the 15 unsheltered, 2 were between the ages of 18-24.

Based on the latest HMIS data for 10/1/2020-9/30/2021, 616 households experienced homelessness or rapid re-housing during the report period. 540 were households with adults only, and 76 were households with adults and children. 74% experienced homelessness for the

first time and this was highest with adults only at 76%. 7% of households did return to homelessness during the reporting period after having a previous permanent housing placement, and 15% of the households have been continuously homeless since a prior reporting period. This was highest for adults with children at 32%, or 24 households. 4% of the total, or 22 households, re-engaged in the homeless system after a previous temporary or unknown destination.

Fifty-nine (59) households identified their prior living situation as homeless for those households with adults and children.

In November 2022, the City of Watertown had approximately 10 homeless individuals sheltering at a pavilion in downtown Watertown. A snow storm hit the City November 18 with almost 5 feet of snow. A temporary shelter was identified by Jefferson County to relocate the individuals. By November 24 there were 20 individuals located at the temporary shelter, and by early December 30 individuals. A Watertown Daily Times article on December 8 quoted the County administrator as stating that 'the county Department of Social Services and local non-profits were working together to identify other housing options as the County is closing the temporary shelter when the warming shelter opens.' A warming shelter opened in late December 2022 at the Salvation Army in Watertown. It has 20 beds and provides shelter from 8PM to 8AM during cold weather events when the temperatures are below 32 degrees F. The article went on to note that some of the individuals currently at the temporary shelter had other housing options but were staying there as there was food and running water/facilities.

A Housing Needs and Market Analysis completed for Lewis County by LeBella Associates noted that the 2021 data completed for the County by the Continuum of Care, CARES of NY Inc., identified 74 households and 100 persons who experienced some level of homelessness for that year. 89% of the population was white and 58% of the population was male. In 2021, 37 individuals (17 females/20 males) utilized Code Blue vouchers through the Lewis County Department of Social Services while 66 individuals (16 females/37 males/13 children) utilized Temporary Housing Assistance.

St. Lawrence County has formed a homeless solutions committee comprised of housing providers and supportive services providers from across the County to address homelessness in the County. Their current focus is on establishing warming centers in Ogdensburg and Massena. The Ogdensburg City Police Department noted in September 2022 that homeless individuals had been staying condemned buildings, and that as these buildings are being torn down, they don't have other shelter. The Ogdensburg City Police were letting homeless sleep in their lobby, however as of January 1, the lobby doors would lock by 11PM and they would no longer be able to allow homeless a place to get warm.

The HMIS Annual Report 10/1/20-9/30/21, identified 1 chronically homeless household with children that was assisted and 81 chronically homeless households with adults only assisted.

At Risk of Homelessness as defined in 24 CFR 91.5

There is a total of 31,900 renter households in the three counties per the 2015-2019 CHAS. Of this amount, 5,975, or 18.7%, have household incomes less than or equal to 30% HAMFI with a cost burden greater than 30%. Alternatively, 4,760, or 14.9%, have household incomes less than or equal to 30% HAMFI with a cost burden greater than 50%. Subsequently, 7,640 households, or 23.9%, have at least 1 of 4 Severe Housing Problems. Almost 15% of households in the three counties have a severe cost burden in regard to their rents and likely many are also located in properties with Severe Housing Problems.

Based on the 2015-2019 CHAS, for the three counties there were 1,900 renter households/units with incomes less than or equal to 30% HMFI living in rentals where there were none of 4 housing problems or a cost burden. This demonstrates that this was affordable housing. However, looking at the CHAS data there are far more households living in housing where there was at least 1 of 4 housing problems and cost overburden. This is substantiated by a housing market analysis completed for the Fort Drum/Watertown market.

A recent housing market analysis around the greater Watertown-Fort Drum area (30 mile radius around Fort Drum) was conducted in September 2022. It noted as a key finding that homelessness and those at risk of homelessness is a leading concern in the targeted area. This is driven not only by displaced locals, but those from outside of the region that have relocated to the area. Delinquency created from job loss or failure to pay rent during the pandemic has had a significant impact on the rental housing market, as has addiction and mental health issues. The lack of available housing in the local market offering supportive services and oversight, coupled with the funding gaps experienced at many local agencies that have created a reduction in available beds (either through closing of properties that formerly housed residents or discontinued referral programs.)

Finally, the HMIS report for 9/30/2021 compiled by the CoC, showed that for households with adults only, 3 households came from group/assisted care institutions, 108 from incarceration, and 42 from medical institutions. They were housed in either EST, RRH, or PSH during this time. Two hundred and six (206) individuals had been staying with family or friends.

We know from interviews that anecdotally, whether they are counted or not, there are many stories of ‘couch-surfing.’ In Jefferson County, the CNY Veteran’s Outreach Center noted that they see many young veterans just out of the Army unable to obtain affordable housing and sleeping on a friends couch until they get a job or find affordable housing. The same is true in St. Lawrence County with stories of ‘couch-surfing.’

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

The most recent HMIS report for the Continuum of Care was for 10/1/2020-9/30/2021. When looking at head of household and adults, it identified 5 victims/survivors of domestic violence

currently fleeing in EST (Emergency Shelter/Safe Haven/Transitional Housing); 10 in Rapid Re-Housing; and 21 in Permanent Supportive Housing. It also identified 4 domestic violence/survivors not currently fleeing located in EST; 5 in Rapid Re-Housing; and 16 in Permanent Supportive Housing. Finally it identified 1 domestic violence victim/survivor and missing current fleeing status located in Permanent Supportive Housing. In regard to Female domestic violence survivors, there were 25 domestic violence victims/survivors who were currently fleeing in EST; 8 in RRH; and 11 in PSH. For domestic violence victims/survivors who were not currently fleeing there were 31 in EST; 18 in RRH; and 18 in PSH. For households with children there were no domestic violence victims/survivors identified.

The Victim's Assistance Center is a comprehensive victims' services agency to assist and provide direct services to victims/survivors of violence and crime in Jefferson, Lewis and St. Lawrence Counties. It noted a 4-year average from 2018-2021 of 57 homeless adults, 16 homeless children, and 592 homeless bed nights. They had an average of 1,183 hotline calls.

Renewal House provides services for domestic violence victims and survivors in St. Lawrence County. During COVID they saw an increase in clients. They operate a 9 bed safe house, however often they needed to use referrals for other housing options either in the County or in adjacent Counties.

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

In addition, there is need within the subpopulations of adults with **serious mental illness and adults with a substance use disorder**. Based on the 2021 CoC point in time report, there were 13 sheltered households and 10 unsheltered households comprised of adults with a serious mental illness. There were 3 sheltered and 12 unsheltered households defined as adults with a substance abuse disorder.

Updated HMIS information for 2022 showed 1,017 people reporting having a mental health disorder of which 289 reported their disorder as a disability. In addition, 418 people reported having a substance abuse disorder. Of this number, 74 reported having alcohol abuse, 234 reported drug abuse, and 110 reported both drug and alcohol abuse. 102 people reported their substance abuse disorder as a disability.

The needs within the SMI and SUD populations are for both housing and supportive services. While there are a plethora of service providers, their resources are stretched thin.

There also continues to be a need for our **Veteran** population for both affordable housing and supportive services. The HMIS report for 10/1/2020-9/30/2021 noted that 6%, or 53, households assisted were households with Veterans. Most were households with an adult and no children. Only 9 households were adults with children. Of these 9, 3 were placed in EST, 2 in RRH, and 4

in PSH. For Veterans, the Veterans Outreach Center notes that there is a need for not only affordable housing but housing, job seeking and financial counseling services.

There is also a need for **quality, affordable low-moderate income housing** for those with income **below 60% AMI**. Based on the 2015-2019 CHAS, for the three counties there were 2,060 renter households/units with incomes greater than 30% HMFI and less than 50% HMFI living in rentals where there were none of 4 housing problems or a cost burden. This demonstrates that this was affordable housing. However, looking at the CHAS data there are far more households living in housing where there was at least 1 of 4 housing problems and cost overburden. This is substantiated by a housing market analysis completed for the Fort Drum/Watertown market.

The Housing Market Analysis provided a breakdown that included a need for about 463 additional apartments/ LIHTC units at or below 60% AMI with low-end income threshold set at the 30% AMI maximum (technically renters earning from \$18,000 and \$46,000).

All three counties are seeing issues with increasing rents that are making it unaffordable for lower income households to obtain quality housing options. In the greater Watertown/Fort Drum market, the Soldier’s basic allowance for housing drives some landlords to charge higher rents. In addition, looking at the HUD data for 2023, the fair market rent for a 2-bedroom in Jefferson County is \$1,221 up 3% over 2022. It is \$899 in Lewis County up 7% over 2022, and \$909 in St. Lawrence County up 10% over 2022. For example, a two person household in Jefferson County at 30% AMI earns \$18,400. A two-bedroom apartment at FMR, or \$1,221, would equate to 80% of their income! More affordable, low income housing options are needed to protect households from the risk of homelessness.

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

The CoC reports the following 2022 Point in Time results below.

Point in Time Overview					
	Emergency Shelter	Transitional Housing	Total Sheltered	Unsheltered	Total
2022	106	9	115	15	130
2021	61	16	77	8	85
Difference	+45	-7	+37	+7	+45

Funding is available throughout the region for housing vouchers and tenant based rental assistance. Programs include STEHP (Solutions to End Homelessness Program), ESSHI, CARES-Emergency Housing Voucher Program, and Section 8.

Credo Community Center is a leading substance abuse treatment provider in northern New York. Credo provides outpatient substance abuse treatment with two locations in the region. They also provide comprehensive chemical abuse and dependence services, a Women's Intensive Residential program, and Men's Community Residences, a Residential Rehabilitation Services for Youth program, and an out-patient Opioid Treatment Program. Because mental health and substance abuse often go hand in hand, Credo began an Outpatient Mental Health Clinic. The clinic is for ages 16 and up and there is no waiting list. PIVOT, formerly the Alcohol and Substance Abuse Council of Jefferson County, provides a wide variety of information, services and programs to work toward an addiction-free community.

ACR Health is a not-for-profit, community-based organization providing a range of support services to individuals with chronic diseases, including HIV/AIDS, substance use disorders, and serious mental illnesses. Furthermore ACR Health provides a wide variety of targeted prevention and sexual health services to individuals, from youth through adulthood, as well as to community groups and organizations. With the incidence of AIDS currently being low, the focus of service delivery is directed toward education.

The Northern Regional Center for Independent Living, NRCIL, is a professional peer-run organization working with people with disabilities while partnering with communities to create accessibility and inclusion. They provide independent living programs, family peer support, home and community based services, and a long-term care ombudsman program.

The ARC Jefferson-St. Lawrence, serves people with development disabilities who demonstrate a need for residential services and supports in Jefferson and St. Lawrence Counties. The ARC operates one community residence, 3 Supportive IRAs, 26 Supervised Individual Residential Alternatives (IRAs) and three intermediate care facilities in Jefferson County. One of the IRA's has been renovated to meet the needs of our dementia population. In St. Lawrence County, The ARC operates a variety of residential opportunities for individuals with developmental disabilities. The Disabled Persons Action Organization (DPAO) in Jefferson County provides quality and effective individualized services to developmentally disabled children and adults in Jefferson and Lewis Counties.

Transitional Living Services of Northern New York (TLS) provides residential services to adults with serious & persistent mental illness. TLS has an Apartment Program with 33 beds in multiple apartment locations in Watertown. TLS has Supportive Housing services that are available to residents of Jefferson, St. Lawrence, and Lewis Counties with a psychiatric illness. TLS also has homeless housing/rental assistance available to residents of Jefferson, Lewis and St. Lawrence Counties that are homeless. The services are grant funded by HUD through the Points North Housing Continuum of Care. In St. Lawrence County, TLS offers a Community Housing Assistance Program. This provides temporary and transitional housing assistance for homeless families and single men and women over the age of 18. It operates 4 low income housing properties serving the homeless and general population of St. Lawrence County. TLS's SRO program has 3 properties designed not only to shelter homeless single men and women over the

age of 18 that meet eligibility requirements, but also to provide assistance and access to many of the services available in St. Lawrence County. Their Gaslight Village consists of 16 single family duplex-styled homes with two, three and four bedroom units. Several of the units are handicapped accessible. This provides transitional housing for homeless single men and women over the age of 18 and permanent supportive housing for homeless families.

The Children's Home of Jefferson County, now known as CHJC, operates the Community Clinic of Jefferson County which is an Outpatient Mental Health Clinic. The Community Clinic opened in its current location in July 2019 to more than 800 individuals waiting for mental health services. Since that time, the Clinic has expanded and serves more than 1200 adults and children each year.

The Victim's Assistance Center of Jefferson County provides direct services to victims/survivors of violence and crime in Jefferson, Lewis and St. Lawrence Counties. The VAC operates a residential home that provides emergency safe housing to individuals (and their dependent children) in crisis, as well as a child advocacy center. The home is also a licensed shelter for the homeless females and their dependent children. The St. Lawrence Valley Renewal House provides a wide variety of services and provides safe housing which is emergency, temporary shelter for domestic violence victims. In Lewis County, Lewis County Opportunities provides a Victim Services program which provides confidential services to crime victims at no charge, with special emphasis on domestic violence and sexual violence. They also provide safe dwelling services which provide victims of domestic violence and their children with temporary, emergency shelter at a confidential location.

Snowbelt Housing received NYS ESG-CV ES funding to provide vouchers in Lewis County. They were assisting 8 with overflow beds associated with their voucher program. They manage several affordable housing properties in Lewis County.

S.T.E.P. by S.T.E.P., Inc.'s mission is to provide people with mental health issues with support as they move back to the larger community. They have drop-in center hours in Ogdensburg, and they recently opened a 20-unit permanent supportive housing project in Ogdensburg targeting those with serious mental health issues.

Citizen Advocates employs 750 health professionals and support staff providing services in developmental disability, mental health and substance abuse prevention, treatment and recovery services throughout Franklin, Clinton, Essex, Hamilton, St. Lawrence and Jefferson Counties.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

The following inventory is from the HUD 2021 Continuum of Care Homeless Assistance Programs Point in Time Report

								Subset of Total Bed Inventory		
	Family Units	Family Beds	Adults-Only Beds	Child-Only Beds	Total Yr-Round	Seasonal	Overflow/Voucher	Chronic Beds	Veteran Beds	Youth Beds
Emergency, Safe Haven and Transitional Housing	6	19	18	0	37	0	42	n/a	4	0
Emergency Shelter	5	15	6	0	21	0	42	n/a	3	0
Transitional Housing	1	4	12	0	16	n/a	n/a	n/a	1	0
Permanent Housing	88	287	254	0	541	n/a	n/a	28	58	0
Permanent Supportive Housing	75	250	205	0	455	n/a	n/a	28	58	0
Rapid Re-housing	13	37	49	0	86	n/a	n/a	n/a	0	0
Grand Total	94	306	272	0	578	0	42	28	62	0

During the Point-In-Time count, there was 100% utilization rate for emergency shelter programs with the exception of the Victims Assistance Center which saw a 75% utilization rate. Victims Assistance Center provides housing for victims of domestic violence. At the time of the count, 6 of 8 units were occupied. There was 100% utilization rate for the Rapid Rehousing programs, 100% utilization for the temporary housing programs, and 91.2% utilization rate for permanent supportive housing.

A temporary transitional homeless shelter/SRO is slated to open in early 2023 and will be operated by TLS in Watertown. It will have 18 beds supporting men. A warming shelter was opened in Lowville, Lewis County, in November 2022 and is operated by the Lewis County Department of Social Services. The Watertown Salvation Army is operating a 20-cot warming shelter at its facility in Watertown. St. Lawrence County is in the process of identifying hosts/locations for warming centers in Massena and Ogdensburg.

In respect to permanent supportive housing, a 20-unit permanent supportive housing project opened in Ogdensburg by S.T.E.P. By S.T.E.P. Inc. in October 2022. There are several permanent supportive housing projects proposed in the region. If all move forward they have the potential to add 158 beds. S.T.E.P. By S.T.E.P. is proposing a 6-unit permanent supportive housing project in Oswegatchie, St. Lawrence County, to support adults with substance use disorder and serious mental illness, re-entry, and chronically homeless. TLS, CREDO, and Neighbors of Watertown are proposing 30 beds of permanent supportive housing and 30 beds of

low income housing in Watertown. Fifteen of the beds would target those with serious mental illness. DePaul Community Services is proposing a 40 bed facility in Watertown with 30 beds targeting adults with serious mental illness and 10 beds targeting frail elderly/seniors. Eagle Star Housing is proposing 30 beds in Watertown targeting veterans with a disability. And TLS and Snow Belt Housing are considering 16 beds in Lowville targeting 4 beds for those with serious mental illness, 4 beds for those with substance use disorders, and 8 beds for young adults 18-25.

In fact, a market analysis completed for the DePaul/Eagle Star projects identified a 4.26% weighted capture rate for 100 units in the Watertown market, indicative of strong overall support for the projects.

There is additional need for funding for supportive services. Through interviews we know that there continues to be funding needs for: housing search and counseling services, life skills training, mental health services, outreach services, substance abuse treatment services, case management, services for special populations, financial assistance costs, and short-term and medium-term financial assistance for rent. While these services are available within the community, there is an issue with capacity for two reasons: (1) staffing and (2) geographic nature. With a low unemployment rate there is significant demand for certified/licensed professionals across all supportive service providers. Second, the three counties are relatively rural and service providers must travel distances from offices to clients to provide services. As it is a rural area, there is not a very good public transportation system. Lewis and St. Lawrence Counties offer some bus routes. Jefferson County is working to establish a bus route. The City of Watertown does have public transportation. Matching up clients with services can be a challenge.

At Risk of Homelessness as defined in 24 CFR 91.5

There has been a lack of new housing options. With stabilization of occupancy, troop strength and stagnant population growth, there is less turnover or availability of housing on a monthly or annual basis. Rents are currently unaffordable to a vast majority of the population as demand is high and supply is stagnant. COVID also played a significant part in the issues in the regional housing market. The inability for landlords to evict coupled with tenants not paying their rents sent many landlords into financial instability with them making the decision to no longer rent their properties to low income households. Several DSS and not for profit agencies noted that it is harder to find landlords willing to work with them when they are placing clients because many left the program.

A Comprehensive Market Study of the greater Watertown/Fort Drum housing market identified the need for more permanent supportive housing. There was a total need for 268 additional apartments with Supportive/Deep Subsidy (ESSHI, Section 8, OMH) targeting households earning below 30% AMI thresholds (technically renters earning from \$0 to \$23,000). In Jefferson County, a committee was formed to address homeless housing issues in the County.

In Jefferson County, families spend on average of 17 months on a waitlist for subsidized housing, showing the high demand for affordable housing. There were 1,019 Section 8 Housing Choice Vouchers in Jefferson County with 92 vacancies and a waitlist of about 1,000. For comparison, St. Lawrence County had 795 vouchers with about 8 vacancies and a wait list of about 300. About 42.5% of Jefferson County voucher holders live outside of the City. In Lewis County, there are 320 vouchers with 90% occupancy/lease up and 100 households on a waiting list.

Lewis County Opportunities, who administers the Section 8 voucher program for both Jefferson and Lewis Counties, also noted that they administer Lewis County's Emergency Food and Shelter Fund through the Emergency Food and Shelter Program. Lewis County receives around \$9,000 annually while St. Lawrence and Jefferson Counties receive more funds, as they have larger populations. It was stated that these funds move very quickly and that additional funding could be used to assist eligible households.

Several not for profits provide programs and services to help the homeless and those in poverty work toward improvements in their quality of life. One such example is the Watertown Urban Mission. The Watertown Urban Mission provides several programs to help those in poverty. These include housing, the Bridge Program, food pantry, Meals on Wheels, and a Getting Ahead/Staying Ahead program. The Bridge Program is an alternative to incarceration and offers those in trouble with the law for substance use related crimes an opportunity to get their lives back by providing intensive support services to include case management, coordination of treatment options, advocacy and participation in peer groups and volunteer activities. The Getting Ahead/Staying Ahead program is a 16-week workshop series encouraging individuals to 'investigate' poverty in their own lives and in their community providing them with the tools and strategies for building resources and working toward a better quality of life. Funding is needed to ensure the continued success of programs such as these and others.

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

In reviewing the data and speaking with service providers, there does not appear a need for new housing units dedicated specifically to those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking or human trafficking. In St. Lawrence County, Renewal House noted that an increase in affordable housing options in the county would be helpful to place families but a new facility dedicated to this population is not needed. The Victim's Assistance Center noted that it would be helpful for funding for case management and services in its Child Advocacy Center.

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 housing study completed for the Watertown/Fort Drum market demonstrated a need for 463 additional apartments for those with incomes at or **below 60% AMI** with a low-end income threshold at 30% AMI. These units are needed as there is an affordability issue within the rental

market. It is important to note that these totals are based on existing residents in the market area that are rent overburdened (paying over 40% of income for rent) or living in substandard housing). For purposes of this study, an additional 475 housing units are needed in the 60% AMI-30% AMI range which will help alleviate those at risk of homelessness by providing safe, affordable housing options.

As demonstrated above, the Consortium continues to see a need for permanent supportive housing especially for those with serious mental health and substance use disorders. Additional affordable housing options for veterans is needed if they are truly ‘couch-surfacing’ and housing, financial and job seeking counseling would certainly help this population, especially the younger soldiers/veterans who just left military service.

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

The current service delivery method works. The Continuum of Care works with ESG funded programs to ensure families that become homeless will be rehoused within 30 days. Steps to accomplish this include: focusing outreach to engage the hardest to serve, utilizing Coordinated Entry (CE) to ensure quick connection to permanent housing, working with NYS to prioritize ESG funding for Rapid Rehousing, and ensuring rapid rehousing/PSH providers do not screen out families based on factors that have no bearing on future housing success.

From the HMIS report for 10/1/2020-9/30/2021 completed by the CoC, 76%, or 403, of those households that exited the system during this time from a temporary situation went to a permanent housing destination. 83% were adult households with children. Of the 255 households served in Permanent Supportive Housing during the report period, 68%, or 174, were already housed in PSH at the beginning of the report period and 24%, or 62, moved into PSH during this time. This demonstrated that the CoC and HMIS are working to place those in the most need into appropriate housing situations and working to move them to permanent supportive housing and affordable housing options.

There is a significant need for affordable housing in the three county region. A gap exists for rental housing in the less than 60% AMI and less than 30% AMI households. The less than 30% AMI households would likely need some type of rental assistance to afford the current rents.

The biggest gap in the delivery system seems to be capacity. There is difficulty in the system of integrating supportive services within low income housing. While funding sources exist, the move to supportive services being integrated within low income housing is a relatively new model. There is a need for qualified, and in some cases licensed/certified staff, to provide these services. The current labor market is extremely tight with around 3% unemployment rate in the three counties. The cost to provide the services are increasing as wages are increasing to bring on qualified staff. In addition, this is an extremely rural area. Many of the agencies that provide supportive services are regional. This means there is a significant amount of driving between agencies/clients/projects. This also takes up a significant amount of time. All add to the costs of

providing supportive services in rural areas. There is continued need for funding for supportive services even if the HOME-ARP funds are a one-time infusion of capital. There is a need for operating capital for temporary transitional shelters/SROs even though operating capital is not an allowed use for HOME ARP funds (unless rehab occurs).

While there is a continued need for permanent supportive housing units, there is a significant amount of public capital available for construction projects with the most popular being HHAP (Homeless Housing Assistance Program) and Low Income Housing Tax Credits.

Code Blue is a NYS funded program that reimburses for essential, additional costs that are directly related to the requirements of the Code Blue regulation to provide shelter when temperatures drop below 32 degrees F.

In regard to rental assistance, there are several programs available in the region including Points North Housing Coalition (the Continuum of Care), ESSHI, STEHP, and Section 8. However, Jefferson County did not receive STEHP funding in 2019. STEHP provides funding to help New Yorkers avoid eviction, secure permanent housing, and receive services that can help them on the path to stability. Massena Independent Living Center received \$400,000 for rapid rehousing and prevention in St. Lawrence County, and Snowbelt Housing received \$121,730 for rapid rehousing and prevention in Lewis County. The next opportunity for the County to apply is in 2024. There continues to be need for short-term and long-term tenant-based rental assistance in all three counties as most housing is unaffordable to many.

While there are a number of rental assistance programs as identified above, there continues to be a need for tenant-based rental assistance. As described above, many renters are cost-overburdened. Tenant-based rental assistance is needed to provide access to housing opportunities that might not otherwise be affordable. The TBRA provides some stability to the tenant and will help meet affordable housing needs until new affordable housing options become available.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Not applicable

Identify priority needs for qualifying populations:

The qualifying populations including homeless; at-risk of homelessness; those fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; and other populations such as those with incomes at or below 60% AMI, veterans, and those with substance use disorders and serious mental health issues need additional

permanent supportive housing, affordable rental housing, tenant-based rental assistance, and supportive services. It is more likely than not that these individuals have some serious mental health issue or substance use disorder, often both.

A study of the greater Watertown area identified a need for at least 731 affordable apartments at or below 60% AMI. Of this total, 268 permanent supportive housing units under 30% AMI were needed. This could be rounded up to 300 to include the entire 3 county region. The biggest gap in the delivery system seems to be capacity.

There is difficulty in the system of integrating supportive services within low income housing. While funding sources exist, the move to supportive services being integrated within low income housing is a relatively new model. There is a need for qualified, and in some cases licensed/certified staff, to provide these services. The current labor market is extremely tight with around 3% unemployment rate in the three counties. The cost to provide the services are increasing as wages are increasing to bring on qualified staff. In addition, this is an extremely rural area. Many of the agencies that provide supportive services are regional. This means there is a significant amount of driving between agencies/clients/projects. This also takes up a significant amount of time, and there is minimal public transportation in rural areas, if any. All add to the costs of providing supportive services in rural areas. Through interviews we know that there continues to be funding needs for: housing search and counseling services, life skills training, mental health services, outreach services, substance abuse treatment services, case management, services for special populations, financial assistance costs, and short-term and medium-term financial assistance for rent.

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

The level of need and gaps in the PJ's shelter and housing inventory and service delivery systems was determined based on comprehensive discussions with service providers throughout the three counties as well as verified by several housing market analysis completed for the Watertown/Fort Drum market and Lewis County. Upon reviewing the HMIS, CHAS and HIC, as well as through correspondence with service providers, the PJ was able to determine the level of need and gaps in the system.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

A Request for Proposals process will be utilized for funding and/or selecting developers and service providers. Once the plan is approved, a RFP will be distributed throughout the three county region giving responders 60 days to submit plans based upon the funding strategies

identified in the plan. Scoring will look at experience, implementation plan, leverage, and timeline to implement the projects.

The Subrecipient has already been identified. The Development Authority of the North Country has been a subrecipient to Jefferson County for the North Country HOME Consortium since its inception in 1992. It was engaged to provide grant administration and program delivery for the ARP funds.

Describe whether the PJ will administer eligible activities directly:

The PJ will enter into a Subrecipient Agreement with Development Authority of the North Country to assist with grant administration and program delivery activities defined in greater detail below. Once developers/not for profits have been identified to implement the programs and services identified in the RFP, the Subrecipient will enter into an agreement with them to ensure compliance with the regulations set forth for the HOME-ARP funding.

If any portion of the PJ's HOME-ARP administrative funds are 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:

Jefferson County has entered into a Subrecipient Agreement with Development Authority of the North Country (DANC) to administer the PJ's entire HOME-ARP grant. DANC has been the subrecipient responsible for administering and delivering the North Country HOME Consortium for Jefferson County since the HOME Program's inception. DANC shall complete the following:

- Develop the HOME-ARP Allocation Plan (Plan) with County through a consultation process to include outreach to stakeholders providing services to HOME-ARP eligible at-risk populations in the three counties. The Plan will be completed in accordance with CPD-21-10.
- Complete annual reports to HUD including Annual Plan Update and CAPER.
- Assist County with RFP process to identify eligible projects per the approved Plan and CP-21-10.
- Enter into contracts with subrecipients/contractors to deliver program funds. Manage project paperwork/files, program compliance, and monitoring.
- Coordinate with County for payment for work completed.
- Complete audit requirements as necessary, and adhere to CPD-21-10 establishing the requirements for funds appropriated under Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

The County will:

- Submit the completed plan to HUD for acceptance.
- Maintain all bank accounts and IDIS.
- Complete required environmental reviews as necessary.

- Ensure all necessary HOME Agreement resolutions are annually administered through the County legislatures.
- Conduct annual monitoring of DANC.

While no funds have been disbursed to the Subrecipient as of the date of this plan, costs have been incurred by the Subrecipient and PJ to complete the Plan. These costs are being tracked.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$420,305.92		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$200,000		
Development of Affordable Rental Housing	\$ 1,800,000		
Non-Profit Operating	\$ #	# %	5%
Non-Profit Capacity Building	\$ 119,521.28	4 %	5%
Administration and Planning	\$ 448204.80	# %	15%
Total HOME ARP Allocation	\$ 2988032		

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

A Request for Proposals process will be utilized for funding and/or selecting developers and service providers. Once the plan is approved, a RFP will be distributed throughout the three county region giving responders 30 days to submit plans based upon the funding strategies identified in the plan. Scoring will look at experience, implementation plan, leverage, and timeline to implement the projects. We will then enter into agreements between DANC and the service provider to implement the programs and follow all HUD/ARP guidelines/regulations. The RFP will reference the requirements set forth in CPD-21-10 for each eligible use of HOME-ARP funds.

\$1,800,000 in funding is set-aside for HOME-ARP Rental Housing. As demonstrated under the Needs Assessment, projects, especially permanent supportive housing, are needed to address homelessness, at-risk of homelessness, those fleeing domestic violence, and other populations in the Consortium. For the HOME-ARP Rental Housing, the PJ will identify within the RFP its criteria for underwriting and review of subsidy layering. The PJ’s project underwriting will include an in-depth review of underlying project assumptions, development sources and uses, and projected operating income and expenses, and the project’s long-term financial viability to determine the project’s need for HOME-ARP assistance while preventing over-subsidization of

the project. For HOME-ARP units for qualifying households, a market assessment is not required. For projects containing units restricted for occupancy by low-income households or market-rate households, the PJ must conduct a market assessment in accordance with 24 CFR 92.250(b)(2). A third-party market assessment completed by the developer or another funder meets this requirement, but the PJ will review the assessment and provide a written, dated acknowledgement that it accepts the assessment's findings and conclusions.

\$420,305.92 is set-aside for Supportive Services. There is an overwhelming need for continued funding of Supportive Services in the three-county region. The eligible Supportive Services will need to fall under one of the following three categories to be eligible: McKinney-Vento Supportive Services, Homelessness Prevention Services, or Housing Counseling Services. Based upon public outreach, the PJ expects interest from applicants for housing search and counseling services, life skills training, mental health services, outreach services, substance abuse treatment services, case management, services for special populations, financial assistance costs, and short-term and medium-term financial assistance for rent. If a person is homeless, then the person will be eligible to be provided the supportive services as McKinney-Vento supportive services for the costs allowable in Section VI.D.4.c of CPD-21-10. If a person is housed and the supportive services are intended to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing to achieve stability in that housing then the person is eligible for homelessness prevention services for the costs allowable in Section VI.D.4.c.i of CPD-21-10. Housing Counseling services may be provided regardless of whether a person is homeless or currently housed. The PJ will document in its files which types of supportive services it will offer program participants, and will document in its written agreements with supportive service providers whether they are authorizing McKinney-Vento supportive services, homelessness prevention services, Housing Counseling services or some combination of the three.

\$200,000 is set-aside for Tenant-Based Rental Assistance. There is continued need for TBRA as almost 15% of households in the three counties have a severe cost burden in regard to their rents and likely many are also located in properties with Severe Housing Problems. TBRA gives households the opportunity to afford quality housing options while allowing them to obtain some financial security by not having to overpay for housing. While not a long-term solution, it fills a need while new affordable housing options are being developed.

The PJ is setting-aside \$119,521.28 for nonprofit capacity building. There is identified need in the Consortium by some nonprofit organizations to expand or improve their ability to successfully carry out eligible HOME-ARP activities. The PJ will ensure that in any fiscal year, capacity building assistance provided to a nonprofit organization may not exceed the greater of 50 percent of the general operating expenses of the organization for that fiscal year or \$50,000.

The PJ reserves the full 15% for administration and planning. These funds will be utilized by Jefferson County for administration of the grant as well as the Subrecipient for administration

and program delivery. The balance of funds will be available to not for profits to be able to administer the grants that they receive.

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

The rationale for the funding plan is to provide \$1.8 million of assistance for rental housing assistance. This will likely be in the form of permanent supportive housing, but does not have to be. A market study of the greater Watertown/Fort Drum market alone demonstrated a need for 268 units under 30% AMI that provided some form of supportive service and/or tenant rental assistance. The number increases by 463 units when you add in the number of units needed below 60% AMI and with a low-end income threshold of 30% AMI. Potential applicants include permanent supportive housing projects that are being planned but are not currently 100% funded, and those not proposed but may be in the future.

The PJ is setting aside \$420,305.92 for supportive services. Extensive public outreach demonstrated interest from potential applicants for: housing search and counseling services, life skills training, mental health services, outreach services, substance abuse treatment services, case management, services for special populations, financial assistance costs, and short-term and medium-term financial assistance for rent.

The PJ is setting aside \$200,000 for TBRA. Based on the numerous studies, CHAS data, and public outreach, there continues to be need for TBRA for all qualified populations but especially for those at-risk of homelessness and other populations.

The data and studies make it clear that there is a need for permanent supportive housing to support qualified populations. It was also clear that those qualifying populations in the area tend to have SMH and/or SUD, or are veterans. The PJ's funding goals are consistent with the data.

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:

Assuming that the Consortium would set a target of \$50,000 per unit in funding through the HOME-ARP Rental Housing Program, then approximately 40 units would be created/rehabilitated for use by the qualifying populations.

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

As mentioned earlier in the Plan, through public consultation and the completion of several studies, there is documented need for deep-subsidy, permanent supportive housing, and low-income housing (under 60% AMI) in the three-counties. Several projects are proposed already

but not funded. The approximately 40 units proposed above would help the PJ meet the needs of creating new units to support the qualifying populations.

Preferences

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

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

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

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

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).

- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan. For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan.** Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project: All qualifying populations are eligible for the supportive services and TBRA. For rental housing, all qualifying populations are eligible with preference given to those with serious mental health issues and/or substance use disorders, and veterans.

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

As noted, there is need within the subpopulations of adults with **serious mental illness and/or adults with a substance use disorder**. Based on the 2021 CoC point in time report, there were 13 sheltered households and 10 unsheltered households comprised of adults with a serious mental illness. There were 3 sheltered and 12 unsheltered households defined as adults with a substance abuse disorder.

Updated HMIS information for 2022 showed 1,017 people reporting having a mental health disorder of which 289 reported their disorder as a disability. In addition, 418 people reported having a substance abuse disorder. Of this number, 74 reported having alcohol abuse, 234 reported drug abuse, and 110 reported both drug and alcohol abuse. 102 people reported their substance abuse disorder as a disability.

There also continues to be a need for our **Veteran** population for both affordable housing and supportive services. The HMIS report for 10/1/2020-9/30/2021 noted that 6%, or 53, households

assisted were households with Veterans. Most were households with an adult and no children. Only 9 households were adults with children. Of these 9, 3 were placed in EST, 2 in RRH, and 4 in PSH. For Veterans, the Veterans Outreach Center notes that there is a need for not only affordable housing but housing, job seeking and financial counseling services.

The preferences identified for rental housing help to meet the needs identified above.

Referral Methods

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

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

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

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

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

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):
Affordable Rental Housing:

A centralized CE intake and parallel vulnerability index form capturing the priority needs will be completed in HMIS by all providers referring qualifying populations to HOME-ARP affordable rental housing projects. For those projects, all qualifying populations will be able to fill out a CE intake/application at entities that currently process CE intakes (i.e. homeless shelters, social service providers, eviction prevention providers, hospitals, jails, etc.) – as well as agencies that will be implementing HOME-ARP affordable rental housing projects. Data from each client’s CE intake and the Vulnerability Index for each type of eligible activity (affordable rental housing) will be utilized to populate a waitlist by CE staff. The waitlist will have tiers of priorities based on the preferences described earlier. Agencies implementing affordable rental housing funded through HOME-ARP will reach out to clients based on the populated waitlist when openings arise. All participating providers will complete a training specific to data entry and assessing for eligible referrals.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

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

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

As mentioned above, for affordable rental housing all qualifying populations will be eligible to apply with preference given to those with serious mental health and/or substance use disorders, and veterans. The CoC’s existing CE intake will be edited to ensure clients are identified by qualifying population and prioritization for rental housing occurs as defined in the HOME-ARP program, and are not turned away for not being homeless.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

Not applicable

Limitations in a HOME-ARP rental housing or NCS project

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act,

section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.

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

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

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

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Not applicable

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Not applicable

HOME-ARP Refinancing Guidelines

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

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