

DRAFT Orange County (NC) HOME-ARP Allocation Plan

Participating Jurisdiction: Orange County, NC HOME Consortium

Date:

Background

The American Rescue Plan Act of 2021 appropriated \$5 billion to provide housing, services, and shelter to individuals experiencing homelessness and other vulnerable populations. These funds were allocated by formula to jurisdictions that qualified for funding through the HOME Investment Partnership Program (HOME Program) from the U.S. Department of Housing and Urban Development (HUD). This special round of funding is called the "HOME-ARP" program. In September 2021, HUD awarded the Orange County, NC HOME Consortium (which consists of Orange County and the Towns of Carrboro, Chapel Hill, and Hillsborough) \$1,371,401 in HOME-ARP funds.

Eligible activities that may be funded with HOME-ARP include: (1) development and support of affordable housing; (2) tenant-based rental assistance; (3) provision of supportive services (such as housing counseling, homelessness prevention, child care, job training, legal services, case management, moving costs, rental applications, and rent assistance); and (4) acquisition and development of non-congregate shelter units.

Funds must primarily benefit individuals and households in the following qualifying populations:

- *Experiencing homelessness (as defined in 24 CFR 91.5 "Homeless" (1), (2), or (3))*
- *At risk of homelessness (as defined in 24 CFR 91.5 "At risk of homelessness")*
- *Fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking, (as defined in 24 CFR 5.2003)*
- *Other populations with high risk of housing instability (including highly cost-burdened low-income households, households who have moved two or more times in the last 60 days, and households living in a hotel/motel)*

Consultation

Before developing its plan, the Orange County, NC HOME Consortium must consult with the local Continuum of Care (CoC), 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.

Summary of the consultation process

- An electronic survey was widely distributed to agencies and organizations that work with people experiencing homelessness, people fleeing domestic violence, justice-involved individuals, veterans, people with low incomes, and other qualifying populations.
- Staff from the Orange County Department of Housing and Community Development attended standing meetings of several relevant groups to present on HOME-ARP and solicit input on priority needs.

Public Participation

*The Orange County, NC HOME Consortium must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, the Consortium 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 Consortium must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, the Consortium must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.*

Public comment period: The draft Orange County HOME-ARP Allocation Plan was made available for public display and comment on the OCHCD website at www.orangecountync.gov/2336/HOME-Program and available in hard copy upon request at the Orange County Housing and Community Development Department (OCHCD) office. The public comment period ran November 16 – December 1, 2021. Public notice of the public comment period was published in English in *The Herald Sun* on Friday, October 29, 2021 and in Spanish in *La Noticia* on Wednesday, November 3, 2021.

Public hearing: A Public Hearing on the draft CAPER was held on November 16, 2021. Public notice of the hearing was published in English in *The Herald Sun* on Friday, October 29, 2021 and in Spanish in *La Noticia* on Wednesday, November 3, 2021. The public comment period ran November 16 – December 1, 2021.

Description of efforts to broaden public participation

Information about Orange County’s HOME-ARP funding was widely distributed, through traditional avenues such as public notices, as well as

The Consortium must consider any comments or view of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summary of comments and recommendations received through the public participation process

TBD

Summary of comments or recommendations not accepted and reasons why

All comments or recommendations will be accepted and a response to each comment will be provided.

Needs Assessment and Gaps Analysis

The Orange County, NC HOME Consortium must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, the Consortium must identify any gaps within its current shelter and housing inventory as well as the service delivery system. The Consortium should use current data, including Point in Time Count, Housing Inventory Count, or other data available through the Continuum of Care (CoC), and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Homeless Needs Inventory and Gap Analysis Table

| Homeless | | | | | | | | | | | | | |
|------------------------------|-------------------|------------|-------------|------------|-----------|------------------------------|----------------------|------|---------------|---------------|------------|-------------|------------|
| | Current Inventory | | | | | Homeless Population | | | | Gaps 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 | TBD | TBD | TBD | TBD | TBD | | | | | | | | |
| Transitional Housing | TBD | TBD | TBD | TBD | TBD | | | | | | | | |
| Permanent Supportive Housing | TBD | TBD | TBD | TBD | TBD | | | | | | | | |
| Other Permanent Housing | | | | | | TBD | TBD | TBD | TBD | | | | |
| Sheltered Homeless | | | | | | TBD | TBD | TBD | TBD | | | | |
| Unsheltered Homeless | | | | | | TBD | TBD | TBD | TBD | | | | |
| Current Gaps | | | | | | | | | | TBD | TBD | TBD | TBD |

¹CoC Housing Inventory Count, 2021 | ²CoC Point in Time Count, 2021

Housing Needs Inventory and Gap Analysis Table

| Non-Homeless | | | | | | |
|--|-------------------|--|-----------------|--|----------------------|-----------------------|
| | Current Inventory | | Level of Need | | Gap Analysis | |
| | # of Units | | # of Households | | # of 0-30% AMI Units | # of 31-50% AMI Units |
| Total Rental Units | TBD | | | | | |
| Rental Units Affordable to HH at 0-30% AMI (At-Risk of Homelessness) | TBD | | | | | |
| Rental Units Affordable to HH at 31-50% AMI (Other Populations) | TBD | | | | | |
| 0-30% AMI Renter HH w/ 1 or More Severe Housing Problems (At-Risk of Homelessness) | | | TBD | | | |
| 31-50% AMI Renter HH w/ 1 or More Severe Housing Problems (Other Populations) | | | TBD | | | |
| Current Gaps | | | | | TBD | TBD |

¹Comprehensive Housing Affordability Strategy (CHAS) data, 2014-2018; Table 18C | ²Comprehensive Housing Affordability Strategy (CHAS) data, 2014-2018; Table 14B | ³Comprehensive Housing Affordability Strategy (CHAS) data, 2014-2018; Table 1

The size and demographic composition of qualifying populations within Orange County boundaries

The 2021 Point in Time Count reports that there were 176 people (in 154 households) experiencing homelessness in Orange County on one night in January 2021. People experiencing homelessness are disproportionately people of color; 67% of people experiencing homelessness in the 2021 Point in Time Count were Black or African-American, whereas just 12% of people in Orange County overall are Black or African-American.

To be continued – data on people at risk of homelessness, fleeing domestic violence, vulnerable to housing instability

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 to prevent homelessness; and those at greatest risk of housing instability or in unstable housing situations

TBD – from consultation survey and meeting feedback

Current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, tenant-based rental assistance, and affordable and permanent supportive rental housing

TBD

Gaps within the current shelter and housing inventory as well as the service delivery system

TBD

Characteristics of housing associated with instability and an increased risk of homelessness (if the Consortium will include such conditions in its definition of “other populations”)

TBD – from consultation survey and meeting feedback

Priority needs for qualifying populations

TBD – from consultation survey and meeting feedback

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

TBD

HOME-ARP Activities

Description of the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the Consortium will administer eligible activities directly

TBD

The Orange County, NC HOME Consortium 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 | TBD | | |
| Acquisition and Development of Non-Congregate Shelters | TBD | | |
| Tenant-Based Rental Assistance | TBD | | |
| Development of Affordable Rental Housing | TBD | | |
| Nonprofit Operating | TBD | | 5% |
| Nonprofit Capacity Building | TBD | | 5% |
| Administration and Planning | \$205,710 | 15% | 15% |
| Total HOME-ARP Allocation | \$1,371,401 | | |

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

TBD

HOME-ARP Production Housing Goals

Estimate of the number of affordable rental housing units for qualifying populations that the Consortium will produce or support with its HOME-ARP allocation

TBD

Specific affordable housing rental production goal that the Consortium hopes to achieve and how it will address the Consortium’s priority needs

TBD

Preferences

Identify whether the Consortium 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)**
- **The Consortium is not required to describe specific projects to which the preferences will apply**

TBD

(If a preference was identified) 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 Consortium's needs assessment and gaps analysis

TBD

(If a preference was identified) How the Consortium 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

TBD

HOME-ARP Refinancing Guidelines

If the Orange County, NC HOME Consortium intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being refinanced with HOME-ARP funds, the Consortium must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the Consortium will refinance existing debt for a HOME-ARP rental project.

Minimum level of rehabilitation per unit or required ratio between rehabilitation to refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity

TBD

Required 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 population for the minimum compliance period can be demonstrated

TBD

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

TBD

Required compliance period (whether it is the minimum 15 years or longer)

TBD

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

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

Other requirements in the guidelines, if applicable

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