

HOME-ARP Allocation Plan Template

Guidance

- To receive its HOME-ARP allocation, a PJ must:
 - Engage in consultation with at least the required organizations;
 - Provide for public participation including a 15-day public comment period and one public hearing, at a minimum; and,
 - Develop a plan that meets the requirements in the HOME-ARP Notice.
- To submit: a PJ must upload a Microsoft Word or PDF version of the plan in IDIS as an attachment next to the “HOME-ARP allocation plan” option on either the AD-26 screen (for PJs whose FY 2021 annual action plan is a Year 2-5 annual action plan) or the AD-25 screen (for PJs whose FY 2021 annual action plan is a Year 1 annual action plan that is part of the 2021 consolidated plan).
- PJs must also submit an SF-424, SF-424B, and SF-424D, and the following certifications as an attachment on either the AD-26 or AD-25 screen, as applicable:
 - Affirmatively Further Fair Housing;
 - Uniform Relocation Assistance and Real Property Acquisition Policies Act and Anti-displacement and Relocation Assistance Plan;
 - Anti-Lobbying;
 - Authority of Jurisdiction;
 - Section 3; and,
 - HOME-ARP specific certification.

Participating Jurisdiction: Winston-Salem Consortium
enter a date.

Date: [Click to](#)

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction’s geographic area, homeless and domestic violence service providers, veterans’ groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

The City of Winston-Salem is the Collaborative Applicant for the Winston-Salem Continuum of Care (NC-500) as well as the Lead and System Administrator (LSA) for the community’s Homeless Management Information System (HMIS). As such, the City works closely with non-profit homeless service providers, the Housing Authority of Winston-Salem, and other CoC

members in administering the community’s response to homelessness and is aware of the needs in the community.

Community Development Department staff gave a virtual presentation to the CoC Operating Cabinet on December 21, 2021. The Operating Cabinet consists of executive staff of homeless service provider agencies, which includes domestic violence service providers and the Housing Authority. A copy of the presentation was sent to the CoC distribution list, which includes staff of homeless service provider agencies and interested citizens. The presentation included the amount of HOME-ARP funds the Consortium will receive, an explanation of Qualifying Populations, and a description of the activities that may be undertaken.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
United Way of Forsyth County	Non-profit. Manages CIC, RRH, Prevention in county	Presentation, ongoing work with CoC	Use of coordinated entry to fill HOME-ARP units, vouchers, and beds.
Housing Authority of Winston-Salem (HAWS)	PHA	Presentation, ongoing work with TBRA, Permanent Supportive Housing (PSH)	Case managers, reports, updates, etc.
Family Services	DV Service Provider	Presentaion	Feedback.
VA Medical Center	Government	Presentation	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Agency Name.	Type of Agency/Org.	Method of Consultation.	Feedback.
Partners Behavioral Health Management	Managed Care Organization	Presentation	Supportive services attached to new construction of housing and housing vouchers
North Carolina Housing Foundation	Developer	Email conversation	Interested in refinance/rehab of its existing stock of properties, which are for special needs.

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

Public Participation

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

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

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

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

- **Public comment period: start date - 3/3/2022 end date - 3/17/2022**
- **Public hearing: 1/19/2022**

The City of Winston-Salem held a virtual public hearing on behalf of the Winston-Salem/Forsyth Housing Consortium on January 19, 2022. The public hearing was advertised through a press release from the City’s Marketing and Communications staff, advertisement in the Winston-Journal and Winston-Salem Chronicle, and posting on the City’s website. The public hearing was recorded and posted on the City’s YouTube channel.

Community Development Department staff gave a presentation similar to one given to the CoC Operating Cabinet but geared toward a general audience. The presentation included the amount of HOME-ARP funds the Consortium will receive, an explanation of Qualifying Populations, and a description of the activities that may be undertaken. Citizens were also directed to a survey to prioritize need and services.

The draft HOME-ARP Allocation Plan was made available for public review and comment beginning March 3, 2022 and ending March 17, 2022. Its availability was advertised in the Winston-Salem Journal and Winston-Salem Chronicle, and it was posted on the City’s website.

Describe any efforts to broaden public participation:

The services of the Marketing and Communications Department staff helped to make the public hearing more widely known. The survey helped to increase interest.

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

Summarize the comments and recommendations received through the public participation process:

Questions and comments received from the public hearing primarily centered on understanding the eligible activities and how HOME-ARP funds could be used. Issues included whether supportive services could be funded without construction or rehabilitation activities, the HOME-ARP restriction period, leveraging requirements for construction projects, the purchase and renovation of abandoned hotels as non-congregate shelter, and the eligibility of using HOME-ARP funds to rehab existing shelter. Staff responded to eligibility and emphasized the importance that an entity receiving HOME-ARP has the financial and management capacity to undertake the project and to comply with HOME-ARP regulations, including through the restriction period.

Other comments included encouraging transparency in the decision-making process and that the City or HAWS should be more directly involved in managing residential property. Staff underlined that decisions are made by the City Council.

One commenter stated a desire to see new construction with supportive services attached, as well as more supportive services attached to housing vouchers. This comment has been made in other forums including in the Continuum of Care and among City staff.

An online survey was available following the public hearing. The survey asked respondents to prioritize the following four eligible program activities and the following four subpopulations of qualifying populations:

- Rental Housing
- Tenant-Based Rental Assistance
- Supportive Services
- Non-Congregate Shelter

- Households Experiencing or At Risk of Homelessness
- Veterans and their Families
- Victims of Domestic Violence, Dating Violence, Sexual Assault, Stalking, and/or Human Trafficking
- Youth Ageing Out of Foster Care

The highest priorities for program activities were rental housing and supportive services. The highest priority subpopulation was Households Experiencing or At Risk of Homelessness, and the second priority was Victims of Domestic Violence, Dating Violence, Sexual Assault, Stalking, and/or Human Trafficking.

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

No comments or recommendations were explicitly rejected. Participants were informed that City Council will have the final authority to accept or reject requests for funding, and that City staff were available to support applicants in furthering their understanding of HOME-ARP regulations prior to submitting funding proposals.

Needs Assessment and Gaps Analysis

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

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	77	20	292	292	0								
Transitional Housing	0	0	57	57	24								
Permanent Supportive Housing	76	24	255	255	147								
Other Permanent Housing						n/a	n/a	n/a	n/a				
Sheltered Homeless						19	276	43	10				
Unsheltered Homeless						0	139	8	0				
Current Gap										n/a	n/a	n/a	n/a

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

OPTIONAL Housing Needs Inventory and Gap Analysis Table

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

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

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

According to the 2021 Point in Time count, there were 462 homeless individuals in 415 households. Of those individuals, 128 were female, 333 male, and 1 transgender. They were nearly equally divided by race with 222 White and 234 Black, 13 of the total were Hispanic/Latino, and 146 were chronically homeless. Additional data show that approximately 50% of homeless individuals have a disability, which can include chronic illness, developmental conditions, physical conditions, mental health conditions, and substance use disorders.

According to the most recent CHAS Data (2014-2018), 56,410 of 146,685 households in Forsyth County were renter households, and 22,555 of those renter households, 40.0%, were at or below 50% of HUD Area Median Family Income (HAMFI). Of renter households, 15,565 households, 27.6%, had at least 1 of 4 Severe Housing Problems, which indicates severe cost burden. Severe cost burden is when the ratio of housing costs to household income is 50% or greater. Also, 55.3% of households at or below 50% HAMFI had severe cost burden.

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

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

The Homeless Need Inventory and Gap Analysis Table indicates that the current inventory is sufficient to accommodate the homeless population. However, Forsyth County has seen an increase in the number of individuals experiencing homelessness since the beginning of the COVID-19 pandemic. This is partly due to the expansion of street outreach. An important service need for sheltered and unsheltered homeless is supportive services connected to housing to help them maintain housing stability.

For households currently housed and at risk of homelessness or housing instability, a need is supportive services and short-term financial assistance to help them maintain housing stability. The City has used ESG-CV and CDBG-CV funds to start a homelessness prevention and diversion program, but those funds will soon end. However, short-term rental assistance may not be able to bridge the gap of housing instability when the available housing is not affordable.

Affordable housing is another unmet housing need. According to the most recent American Community Survey (2019), an estimated 5,406 renter-occupied housing units have monthly housing costs of less than \$500, and an estimated 24,388 renter-occupied housing units have monthly housing costs of less than \$800. Such units would be appropriate for qualifying populations. The City of Winston-Salem completed a Housing Study and Needs Assessment in 2018. The study projected a need for 14,000 affordable housing units, although not all of those would be needed for qualifying populations.

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:

Number and types of beds available to qualifying populations are shown in the gaps analysis above. The most recent funding allocations are:

- \$188,585 in Emergency Solutions Grant (ESG) entitlement. Of these, 53.9% is used for emergency shelter operations and street outreach and 46.1% for rapid rehousing.
- \$2,348,774 in Continuum of Care funds, which are used for permanent supportive housing, rapid rehousing, joint transitional housing/rapid rehousing, coordinated intake, HMIS, and planning.
- \$211,432 in ESG funds from the North Carolina Department of Health and Human Services (NCDHHS) and used for emergency shelter operations, rapid rehousing, and HMIS.
- The City of Winston-Salem has used CARES Act funds, both \$2,708,005 in ESG-CV entitlement and \$1,792,116 in ESG-CV from NCDHHS, to supplement these activities. These funds have also been used to start prevention and diversion programs, since these have been identified as needs.

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

The main gaps in the current housing inventory are an insufficient number of units affordable to households under 50% AMI and a lack of supportive services connected to housing. Supportive services could include mental health and substance abuse services, life skills classes, and a peer support specialist on site or a case manager for qualifying populations.

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

The leading characteristics associated with housing instability are low household incomes and increasing rents. The economic results of the COVID-19 pandemic have led to job losses and a slow recovery for frontline service workers. When households pay more than 30% of their annual income in housing costs, the likelihood for financial hardship, including housing instability and homelessness, increases. The demand for housing is greater than the supply of housing, which has driven up rents. Average rents have risen approximately 14% in the last year, which disproportionately affects low-wage and minority renters. Finally, landlords who are willing to accept housing vouchers have decreased, leaving many vouchers unused.

Identify priority needs for qualifying populations:

Permanent supportive housing and services

Units of permanent housing within a larger project with possible services

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

The Continuum of Care used a variety of local and federal data sources to inform its understanding of community need. Locally, PIT and HIC surveys were crucial in determining the availability of units and beds to meet the needs of local citizens experiencing homelessness. The American Community Survey (ACS) data informed the statement of need concerning affordable housing and the degree to which renters are cost-burdened in the area.

HOME-ARP Activities

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

The method to select entities to carry out projects will depend on the type of project. Tenant based rental assistance and supportive services would be through an application process, which could be the City’s annual request for proposal or a separate process. Proposals for rental housing and non-congregate shelter projects would be received on an ongoing basis, and the City may publish a request for proposal(s). Funding for non-profit operation expenses and non-profit capacity building may be considered and reviewed on an as-needed basis.

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

No portion of HOME-ARP funds will be provided to a subrecipient or contractor to administer the entire HOME-ARP program.

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 439,432		
Acquisition and Development of Non-Congregate Shelters	\$ 75,000		
Tenant Based Rental Assistance (TBRA)	\$ 50,000		
Development of Affordable Rental Housing	\$ 3,550,000		
Non-Profit Operating	\$ 20,000	0.4 %	5%

Non-Profit Capacity Building	\$ 20,000	0.4 %	5%
Administration and Planning	\$ 733,135	15 %	15%
Total HOME ARP Allocation	\$ 4,887,567		

Additional narrative, if applicable:

The allocation of funds listed above are projections based on current priorities. The allocation may change based on changing needs and priorities or the funding needs of individual projects.

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:

Data from the CHAS, ACS and housing study confirm that the primary need is for permanent housing, including permanent supportive housing.

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:

The estimated total number of HOME-ARP units in rental housing is 48. The estimated number of HOME-ARP TBRA units is 6 units.

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

The estimate for use of HOME-ARP funds in rental housing is based on the way the City uses HOME funds in rental housing. HOME-assisted units generally comprise 6-8 units in an affordable multifamily development, mostly developed with Low Income Housing Tax Credits. The City typically commits \$400,000-\$600,000 to a development, which is 5-10% of the total project cost. Used in this way, HOME-ARP funds would produce 6 developments with a total of 36-48 HOME-ARP units and 288-360 total units. This would make a significant contribution to the community’s affordable housing stock.

Preferences

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

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

The City does not anticipate giving preference to one or more qualifying populations at this time.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and

families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

n/a

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

n/a

HOME-ARP Refinancing Guidelines

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

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***

There are no current plans to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. The City's policy would be that the project not have an acquisition cost in excess of sixty percent (60%) of the total replacement costs, which is in line with the North Carolina Housing Finance Agency 2022 QAP.

- ***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.***

There are no current plans to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. The City would conduct a review of the project proposal, including management practices, scope of work, financing, operating proforma.

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

There are no current plans to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. New investment would be to maintain current affordable units, but could also be used to create additional affordable units.

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
There are no current plans to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. The minimum compliance period would be 15 years.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
There are no current plans to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds. HOME-ARP funds would not be used to refinance multifamily loans made or insured by any federal program, including CDBG.
- ***Other requirements in the PJ's guidelines, if applicable:***
The City may add or revise requirements in its guidelines at a later time.