

HOME-ARP Allocation Plan Template with Guidance

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

HOME-ARP Allocation Plan Template

Guidance

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

Participating Jurisdiction: City of Albany

Date: August 3rd, 2022

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- 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.

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.

Template:

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

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:

In accordance with the requirements of the HOME-ARP Program, CARES of NY, Inc. on behalf of the City of Albany – Albany Community Development Agency (ACDA) consulted with the community stakeholders and the public to obtain data and feedback on the needs and gaps to address homelessness and housing instability in Albany. For this process, CARES first consulted with the Albany Housing Authority (PHA) via a virtual meeting to obtain their qualitative and quantitative data to inform the needs assessment and gap analysis. Next, an information session was held with Albany affordable housing developers which was followed by an online survey to this same constituency. A second online survey was issued to community stakeholders that captured their funding recommendations. A stakeholders' forum was held five weeks following the stakeholder survey submission deadline. This forum allowed for stakeholder education on the HOME-ARP program and in-depth discussion on community needs to address homelessness and housing instability. The same stakeholder survey was emailed and available online to the public, which outlined the amount of money awarded to the City of Albany, explained eligible activities and requested funding recommendations. The survey also provide data on the qualifying subpopulations most in need of housing to help inform decision making. This final survey was followed by a public hearing where CARES staff provided an overview of the proposed Allocation Plan (based on gaps analysis and feedback received from stakeholders) to the public and facilitated a discussion to address questions.

Consultation with the Albany Housing Authority (AHA) (the only PHA operating in the City of Albany) CARES of NY, Inc. on behalf of the City of Albany – ACDA met with the Albany Housing Authority (AHA) on March 21st, 2022 to review the allocation of funds for eligible activities, qualifying populations, and preferences for targeted assistance within the HOME-ARP program. AHA provided CARES with aggregate data on the Housing Choice Voucher Program (Section 8) and PHA waitlists to include in the Needs Assessment and Gap Analysis portion of the Allocation Plan.

Consultation with Developers

CARES of NY, Inc. on behalf of the City of Albany – ACDA invited eleven (11) and met with eight (8) City of Albany’s primary affordable housing developer team members on March 31st, 2022 to participate in the consultation process. CARES staff provided an overview of the HOME-ARP program’s eligible activities, qualifying populations, and funding requirements. Additionally, CARES staff facilitated a discussion to provide clarity to developers and obtain feedback on interest in and the need for HOME-ARP funding to develop affordable housing in the City of Albany. Following the developer’s forum, a survey was distributed to the attendees on May 3rd, with a close date for responses on May 9th, 2022 to gauge interest in the potential use of HOME-ARP funds. The forum and survey asked for feedback on (1) Are HOME-ARP funds necessary to create additional affordable housing units (compared to other local, state, and federal resources), and (2) Are HOME-ARP funds desirable to affordable housing developers, given restrictions such as accepting clients from a Coordinated Entry waitlist and the need to make units available to all qualifying populations.

Consultation with Stakeholders

CARES of NY, Inc. on behalf of the City of Albany – ACDA invited the full CoC membership and additional stakeholders serving and/or representing various subpopulations and underrepresented populations to participate in the consultation process. To that end, a stakeholder survey was disseminated on March 16th – with a close date of March 30th, 2022, requesting input on which eligible activities, qualifying populations, and subpopulations (if any) should be targeted with HOME-ARP resources to reduce homelessness and increase housing stability in the city of Albany. After collating feedback from the survey, a forum was held on April 21st, 2022 with an agenda for an in-depth discussion about the program, an analysis of data on homelessness (from the Homeless Management Information System/HMIS, Coordinated Entry) and sharing results from the affordable housing and stakeholders’ surveys.

147 stakeholders, spanning sixty (60) organizations were invited to participate in the stakeholder survey including: members of the CoC serving the jurisdiction’s geographical area, the Albany County Coalition on Homelessness, comprised of homeless service providers (i.e., Interfaith Partnerships), domestic violence service providers (i.e., Equinox), veterans groups (i.e. Albany Housing Coalition, VA), public agencies that address the needs of the qualifying populations (as listed in chart below), fair housing organizations (i.e., Legal Aid Society of Northeastern New York, Citizen Action of New York), civil rights (i.e., Capital Region Pride Center, Citizen Action of New York), and persons with disabilities advocacy groups (i.e., Capital District Center for Independence, Inc., and Capital Area Peer Services). Twenty-one (21) out of 147 organizations responded to the survey. Of the sixty (60) organizations invited to the stakeholder forum, seventeen (17) attended. At least one agency from each of the aforementioned types of organizations participated, as described in further detail in the chart below. Please note, the Capital District Center for Independence was contacted to complete the survey and attend the stakeholder forum; no feedback was received. However, many of the below agencies serve persons with a variety of disabling conditions, including physical, mental, and developmental.

The shared survey information from stakeholders was utilized as a springboard to discuss the best way to utilize these funds to address homelessness/housing instability needs.

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

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Albany Housing Authority	Type of Agency/Org: Public Housing Authority QPs served: all	Meeting	The AHA recommended prioritizing TBRA and Support Services within the eligible activities under HOME-ARP. AHA emphasized most funds should be allocated to TBRA. Regarding preferences, AHA recommended prioritizing youth and people exiting incarceration.
Betts Housing Partners	Type of Agency/Org.: Real estate development company focusing on affordable housing QPs served: all	Meeting and Follow-Up Survey	Noted in follow-up survey, an agency working with Betts Housing, (DePaul) would be interested in utilizing these funds to create additional affordable housing for the qualifying populations.
The Community Builders	Type of Agency/Org.: Affordable Housing Developer QPs served: all	Meeting and Follow-Up Survey	Questioned if funds can be used to preserve LIHTC units as affordable since the building of new affordable housing may exceed the entire grant amount. It was relayed in response this is a possibility if the project meets all other funding requirements (i.e. serves qualifying populations as noted in City of Albany's Allocation Plan). Noted use of funds will require coordination with other funders when writing marketing plans.
Home Leasing	Type of Agency/Org: Real estate development company focusing on affordable housing QPs served: all	Meeting	Inquired about the threshold for Davis Bacon (12 or more HOME assisted units).
Winn Co.	Type of Agency/org.: Real estate development company focusing on affordable housing QPs served: all	Meeting and Follow-Up Survey	Feedback from survey concluded that Winn "would be willing to dedicate a portion of affordable housing project units to qualifying populations as defined by HUD."
MDG Design & Construction	Type of Agency/Org.: Real estate development company focusing on affordable housing	Meeting	No substantial feedback provided.
Conifer, LLC	Type of Agency/Org.: Real estate development company focusing on affordable housing	Meeting	Expressed to ACDA a hesitancy in utilizing HOME-ARP funds over HOME funds, as the latter are more flexible in terms of populations able to

	QPs served: all		serve.
Capitalize Albany	Type of Agency/Org: economic development	Meeting	Capitalize Albany connected CARES with affordable housing developers.
Albany County Land Trust	Type of Agency/Org.: Non-profit, permanent, affordable rental housing development and homeownership opportunities for low-income households. QPs served: at-risk families, other populations requiring services or housing to prevent homelessness or at greatest risk of housing instability.	Meeting and Survey	“There are limited HCR resources for rental rehab, primarily the PLP program. We support redevelopment of existing housing stock in Albany neighborhoods for affordable housing use.”
Albany County Dept Mental Health	Type of Agency/Org: county mental health provider. QPs served: all Subpop focus: mental health/SMI	Survey	Recommended equally prioritizing affordable rental housing development, support services and non-congregate development as high needs. Recommended evenly prioritizing funding allocation to Affordable rental housing development and support services. Prioritized homelessness, and at-risk of homelessness and other populations for qualifying populations.
Alliance for Positive Health	Type of Agency/Org: community based org dedicated to improving lives impacted by HIV/AIDs and other chronic illnesses QPs served: all Subpop focus: HIV/AIDS, chronic health conditions	Survey and Forum	Equally recommended prioritizing TBRA and support services as eligible activities. Recommended prioritizing funding for TBRA (60%) with remainder split between support services and non-congregate development. Recommended equally prioritizing fleeing or attempting to flee DV/SA/Stalking or HT and other populations.
Capital Area Council of Churches	Type of Agency/Org: faith-based agency that manages a seasonal shelter QPs served: homeless	Survey and Forum	Recommended prioritizing non-congregate shelter development and affordable rental housing development amongst eligible activities. Recommended prioritizing funding for non-congregate development (60%) with remainder of funds split evenly between affordable rental housing

			development and TBRA. For QPs, recommended prioritizing Homeless, and At-risk of homelessness. During the forum, identified a need for low-barrier shelter, as the Capital Area Council of Churches is only open during Code Blue.
Capital Area Peer Services	Type of Agency/Org: peer advocacy and service agency for persons with mental illness. QPs served: all Subpop focus: mental illness	Survey	Recommended prioritizing support services and non-congregate shelter development amongst eligible activities. Most of the funding was placed in support services but noted a major need for funding other activities. QPs recommended to be prioritized were fleeing or attempting to flee DV/SA/Stalking/Human Trafficking, and homeless. Noted a need to fill gap within the community for hard to house individuals (repeatedly evicted or discharged quickly) who require assistance in support services to maintain housing stability.
Catholic Charities Housing Office	Type of Agency/Org: provides a continuum of housing and support services. QPs: all	Survey	Recommended prioritizing affordable rental housing development, support services, amongst eligible activities. Indicated most funds should be allocated to affordable rental housing development with the remainder evenly split amongst remaining activities. Recommended prioritizing at-risk of homelessness, homeless, fleeing or attempting to flee DV/SA/Stalking/Human Trafficking, as qualifying populations.
Citizen Action of New York and the Public Policy and Education Fund	Type of Agency/Org: Non-Profit advocacy organization for social change – in part addresses fair housing and civil rights issues. QPs served: All	Survey	Recommended prioritizing non-congregate development and affordable housing. Preferred 40% allocation to affordable housing with the remainder evenly split amongst remaining activities. Recommended prioritizing homeless and at-risk of homelessness as qualifying populations to serve. Emphasized the need for affordable housing within mixed-use buildings to discourage neglect in neighborhoods deemed

			"undesirable".
DePaul Community Services	Type of Agency/Org: Affordable Housing - Assisted Living; QPs served: All	Survey and Forum	Recommended prioritizing acquisition and development of non-congregate shelters within the eligible activities (labeled this activity as 1 st priority). Noted a need for funding for all activities as well as equal need for all qualifying populations.
Equinox	Type of Agency/Org: Non-Profit agency serving survivors of domestic violence, dating violence, sexual assault, stalking, and human trafficking; and youth QPs served: Homeless, At-risk of homeless, Fleeing or Attempting to Flee Domestic Violence/Dating Violence/Sexual Assault/Stalking/Human Trafficking Subpop focus: youth; survivors of domestic violence, dating violence, sexual assault, stalking, or human trafficking.	Survey and Forum	Recommended prioritizing affordable rental housing development within the eligible activities. Emphasized a need for funding in affordable housing and remainder evenly split amongst other activities. Recommended prioritizing homeless and at-risk of homeless within qualifying populations.
Family Promise of the Capital Region	Type of Agency/Org: Faith-Based agency focused on responding to family homelessness QPs served: All	Survey and Forum	Recommended prioritizing affordable rental housing development and TBRA within eligible activities. Emphasized a need for funding within affordable housing with remainder of funds evenly split between remaining eligible activities. Recommended prioritizing homeless and at-risk of homeless amongst qualifying populations. Feedback from organization includes an emphasis on the need of affordable housing stock, landlord engagement and incentives, increased home ownership, neighborhood development and studio apartment developments for low-income single individuals.

FOCUS Churches of Albany	Type of Agency/Org: Faith-Based agency focused on providing food and housing QPs served: Homeless	Survey and Forum	Recommended equally prioritizing TBRA and support services as eligible activities. Recommended prioritizing funding for TBRA (40%) with remainder allocated between remaining activities. Lastly, recommended prioritizing at-risk of homeless and homeless within qualifying populations. Noted that within the community, due to the depletion of ERAP funding and the eviction moratorium lift, more individuals are seeking assistance and are at-risk of homelessness due to nonpayment of rent.
Homeless and Travelers Aid Society (HATAS)	Type of Agency/Org: Non-Profit agency focused on ending homelessness QPs served: Homeless	Survey and Forum	Recommended prioritizing non-congregate development amongst eligible activities. Funding allocation recommendations included prioritizing non-congregate shelter development and affordable rental housing development. Lastly, recommended prioritizing homeless and at-risk of homeless within qualifying populations. Emphasized the need for serving persons with criminal justice involvement, noting those exiting criminal justice are not prioritized for CoC-funded housing as they are – by definition – not chronically homeless.
Hope House	Type of Agency/Org: Non-Profit agency focused on addiction treatment QPs served: All Subpop focus: substance use disorder	Survey and Forum	Recommended prioritizing non-congregate development amongst eligible activities. Funding allocation recommendations were evenly split between TBRA (40%) and non-congregate shelter development (40%) with remainder allocated to support services. Lastly, recommended prioritizing homeless and at-risk of homeless amongst qualifying populations.
Housing For All	Type of Agency/Org: Community organizing and advocacy group for affordable, safe housing opportunities. QPs served: N/A advocacy-based	Forum	No feedback.

IPH	Type of Agency/Org: Non-Profit, unsheltered, Emergency and Permanent Housing Provider serving persons experiencing homelessness. QPs served: Homeless	Forum	Identified the need for a low-barrier shelter.
In Our Own Voices, Inc.	Type of Agency/Org: advocacy and service agency for LGBTQ+ people of color QPs served: All Subpop focus: LGBTQ+ people of color	Survey and Forum	Recommended prioritizing support services amongst eligible activities with most of the funding allocated to that activity (suggested 60% of funds allocated to support services). Remainder of funding was recommended to be allocated to TBRA and non-congregate development (20% of funding allocated to each, respectively). Recommended prioritizing homeless and at-risk of homeless amongst qualifying populations. Emphasized that LGBT youth and Transgendered individuals are an identified high priority need, specifically those who identify as BIPOC (Black, Indigenous, and People of Color).
Joseph's House & Shelter	Type of Agency/Org: Unsheltered, Emergency and Permanent Housing Provider serving persons experiencing homelessness. QPs served: Homeless	Survey	Recommended prioritizing non- congregate development and affordable rental housing development. Funding recommendations were equally distributed between non-congregate shelter development (40%) and affordable rental housing development (40%) with remaining funds distributed amongst remaining activities. Persons experiencing homelessness were recommended for prioritizing amongst qualifying populations.
Legal Aid Society	Type of Agency/Org: Non-profit, Legal services QPs served: All	Forum	Recommended prioritizing TBRA because there is more feasibility and quicker to access TBRA than to wait for affordable rental housing development. Also expressed concern the funding isn't enough to support significant affordable rental housing development.
Pride Center of the Capital Region	Type of Agency/Org: Non-Profit, Civil Rights,	Survey and Forum	Recommended prioritizing Homeless/Eviction Prevention services.

	<p>advocacy and service provider for the LGBTQ+ community.</p> <p>QPs served: All</p> <p>Subpop focus: LGBTQ+</p>		<p>Recommended prioritizing TBRA amongst eligible activities and allocated 40% of funding to this activity.</p> <p>Recommended remainder of funds to be evenly split between remaining activities. Recommended prioritizing at-risk of homeless and homeless amongst qualifying populations.</p> <p>Emphasized the need to address the LGBTQ+ disproportionality within the homeless system as 40% of the homeless youth identify as part of the LGBTQ+ community.</p>
St. Anne Institute	<p>Type of Agency/Org: Non-Profit agency serving youth and families</p> <p>QPs served: all</p> <p>Subpop focus: youth</p>	Survey	<p>Recommended prioritizing support services amongst eligible activities with most of the funding (40%) allocated to that activity. Remainder of funding recommended to be allocated to the remaining eligible activities equally.</p> <p>Lastly, recommended prioritizing homeless and at-risk of homeless amongst qualifying populations.</p>
St. Catherine's Center for Children	<p>Type of Agency/Org: Non-Profit human services provider</p> <p>QPs served: Homeless, At-risk of homeless, other populations</p>	Survey and Forum	<p>Recommended equally prioritizing affordable rental housing development and support services with a majority of funding allocated (80%) to these activities. Recommendations included remainder of funds allocated to remaining eligible activities (TBRA and support services). Recommended equally prioritizing homeless and fleeing or attempting to flee DV/SA/Stalking/Human Trafficking amongst qualifying populations. Noted in feedback, "affordable housing is our greatest need".</p>
Stratton VAMC	<p>Type of Agency/Org: Veteran's Organization</p> <p>QPs served: All QPs</p> <p>Subpop focus: veterans</p>	Survey and Forum	<p>Recommended prioritizing affordable rental housing development amongst eligible activities with most of funding (60%) allocated to this activity.</p> <p>Recommended remainder of funds allocated to support services and non-congregate development equally.</p> <p>Recommended prioritizing at-risk of homelessness and homeless within qualifying populations. Emphasized the</p>

			need for affordable housing with cleaning services to assist aging veterans (and other populations) who may need assistance within their home and are not yet appropriate for Assisted Living.
The Altamont Program - Schuyler Inn	Type of Agency/Org: Non-Profit homeless shelter provider QPs served: Homeless	Survey	Recommended prioritizing affordable rental housing development amongst eligible activities with (40%) allocated to this activity. Remainder of funds allocated to remaining eligible activities equally. Prioritized other populations and homeless amongst qualifying populations.
Trinity Alliance of the Capital Region	Type of Agency/Org: Non-Profit neighborhood revitalization and education/employment agency QPs served: Homeless, At-risk of homeless, other populations	Survey	Recommended prioritizing affordable rental housing development amongst eligible activities. Funding recommendations included an even split between affordable rental housing development (40%) and TBRA (40%) with the remainder (20%) allocated to support services. Recommended prioritizing at-risk of homelessness and other populations within qualifying populations.

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

Stakeholders noted in the chart above who participated in the survey and forum evenly prioritized affordable rental housing development and acquisition and development of non-congregate shelters as activities most needed to reduce homelessness and increase housing stability within the city of Albany. However, votes for support services and TBRA came in extremely close to the vote for development activities, indicating the community feels there is a need for funding for all four eligible activities. In terms of funding, participants recommended allocating 20% to TBRA, 20% to support services, 20% to acquisition and development of non-congregate Shelters, and 40% for affordable rental housing development. During the stakeholder forum, a concern was raised about allocating funding to affordable rental housing development because the total amount of funding is small and insufficient compared to the costs of developing affordable rental housing. However, these same developers reported via the survey that HOME-ARP funds would help leverage state and federal resources (matching funds from a new source) making their applications more competitive and resulting in funding to develop more affordable housing to the city of Albany. They reported a local contribution of between 2% and 10% of a total project cost is necessary to be competitive for state and federal resources. HOME ARP qualifies as a local contribution. Additionally, a large portion of developer respondents confirmed their agency would be willing to dedicate a portion of affordable housing project units to HOME ARP qualifying populations including persons exiting homelessness; at-risk of homelessness; fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; or other populations defined by HUD as at greatest risk of housing instability. Stakeholders at the forum also emphasized the need for low-barrier non-congregate shelter, as currently low barrier shelters are only open during the Code Blue season.

Stakeholders prioritized the qualifying populations in the following order: first - homeless, second - at-risk of homelessness, third - fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking and fourth - other populations experiencing or at greatest risk of housing instability. Stakeholders also identified subpopulations preferences to include households who have been chronically homeless, persons with criminal justice involvement (consultations with the Albany Housing Authority included discussions that also supported the need to assist persons with criminal justice involvement), persons in unsheltered situations, persons with severe mental illness and persons with substance use disorder. Feedback from stakeholders (both via survey and forum) included the need for housing that is actively affirming of the LGBTQ+ population, housing prioritizing youth, and housing to address racial disparities. The need for LGBTQ+ affirming services and housing was emphasized for the youth population because Albany's homeless youth population is disproportionately LGBTQ+ and there is a lack of resources to fill this gap. Additionally, during the stakeholder's forum, the need for safe and accessible units for the elderly and persons with physical disabilities was identified as there is limited accessible, most Albany homes were built prior to ADA requirements for construction, and affordable housing stock in the City of Albany.

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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.

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.

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.

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: 5/18/2022***
- ***Public comment period: start date - 7/15/2022 end date - 8/1/2022***
- ***Date(s) of public hearing: 6/1/2022***

Describe the public participation process:

In accordance with the requirements of the HOME-ARP program, public participation was encouraged through an online survey, subsequent public hearing, and public comment period. Materials, including a flyer, email notifications and an online registration page (via Eventbrite) were all translated into Spanish, a common first language in the City of Albany. CARES promoted the availability of special accommodations and/or translation

services through email notifications which included an announcement email and a follow up email reminding invitees of the forum and how to request translation services and/or special accommodations, and on the dedicated city of Albany HOME-ARP page on the CARES website. Additionally, the CARES website works in tandem with browser extensions and built-in support applications to provide translation and special accommodations (i.e., read aloud capabilities). Email invitations of the public forum were sent on May 18th, 2022, giving a fourteen (14) day advance notice to invitees of the forum. The survey detailed the HOME-ARP program, informed the funding amount allocated to the city of Albany and requested feedback from community members on which eligible activities and qualifying populations were in the most need to reduce homelessness within the city. The survey also asked which subpopulations might need prioritization and whether there were traditionally underserved populations that were not captured within the survey. On June 1st, 2022, a virtual public hearing was held via Zoom. Fourteen individuals registered for the public forum and CARES presented to eight individuals who attended. At the hearing, CARES displayed the funding amount allocated to the city of Albany, outlined funding amount recommendations for the four eligible activities and suggested preferences for qualifying populations to serve. After the presentation, the hearing was opened to questions and feedback. A participant noted that the recommended funding (36% to support services, 32% to affordable housing development, 21% to tenant based rental assistance, and 11% to development and acquisition of non-congregate shelters) “hit the nail on the head” and expressed the need for more funding to reduce homelessness and sustain housing stability long-term. Clarification on the RFP process for non-congregate shelters after the acceptance of the allocation plan was provided by CARES. No other feedback was provided. Public notification of the public comment period was made on June 28th, 2022, giving a fourteen (14) day notice that the public comment period would be available for fifteen (15) days beginning July 15th. The public comment period was announced on July 15th, 2022, via email with links to the CARES website and remained open for fifteen (15) days, ending on August 1st, 2022. This announcement was made in both English and Spanish. During this time, the drafted allocation plan was made available for review on the CARES website. Contact information to request special accommodations and/or translation services for the drafted allocation plan was also made available on the CARES website. There were no requests for special accommodations or translation services. Additionally, CARES did not receive any public comments about the drafted allocation plan.

Describe any efforts to broaden public participation:

A public survey and information on the upcoming public hearing were issued through various channels including the CoC membership distribution list where it was asked to be shared with agency staff and clients. The survey and public hearing information were also sent to organizations that have a broad reach with the general public in the city of Albany with an ask that these organizations forward the information to their own listservs, including: Housing for All (a local affordable housing advocacy group), CANA (Collision of Albany Neighborhood Associations), City Common Council members, and Albany Community Action Partnership. The survey and public hearing information were also sent to organizations that serve traditionally underserved populations including Citizen Action, Albany Social Justice Center, Pride Center (LGBTQ+ members), and AVillage (an organization dedicated to improving an underserved neighborhood in Albany). CARES also posted on its website the public survey, funding amount allocated to the city, list of eligible activities and qualifying populations for services, the public hearing date and link to the virtual meeting. Marketing materials for the public hearing (i.e. flyers) were created and sent to the city of Albany for distribution through their email lists and social media sites to encourage public participation. Materials for the public hearing were translated into Spanish, posted on the CARES website and distributed to the City of Albany for posting on its website. Requests for special accommodations or translation services options were made available to the public through email blasts detailing the public forum (in English and Spanish) and on the CARES HOME-ARP webpage. The allocation plan’s posting for public comment was announced through email blasts utilizing the same outreach method as the public survey (i.e. sending to agencies, neighborhood associations, council members, etc. to pass on to their listservs). The public comment period of July 15th through August 1st (fifteen (15) days) was announced to the public on June 28th, 2022. In this notice, the public was advised to send comments and

requests for special accommodations and/or translations for reviewing the allocation plan to Genesis Matthey, CoC Project Coordinator for CARES of NY, Inc. During the public comment period of July 15th through August 1st, there were no requests for accommodations or translation services. Additionally, there were no public comments received about the allocation plan.

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 either in writing, or orally at a public hearing:

In early May 2022, a survey was distributed to the public by email. CARES sent this survey to the following local entities: CoC members (approximately 144 individuals), stakeholders that serve traditionally underserved populations, social justice organizations, city council members, neighborhood associations and community action partners. CARES requested they also share the survey with their own staff, clients, and/or listservs. This survey asked respondents their opinion and ranking preference on eligible activities to best address homelessness and housing instability and about the need among qualifying populations, and subpopulations impacted by homelessness and housing instability. Eighteen participants responded to the survey. Of these respondents, a majority favored prioritizing affordable housing and the development of non-congregate shelters among eligible activities. In terms of funding allocation, 40% ranked funding affordable rental housing development first and 20% for the remaining eligible activities. 77.8% of participants ranked prioritizing the homeless qualifying population and 66.7% of participants ranked prioritizing the at-risk of homelessness qualifying population. Participants also selected subpopulations for targeted preference for services with the top five subpopulations in preference order being 1) persons with severe mental illness, 2) households who have been chronically homeless, 3) victims/survivors of domestic violence/dating violence/sexual assault/stalking or human trafficking, 4) persons exiting the criminal justice system and 5) persons in unsheltered situations. When asked about other populations that have been traditionally underserved and/or discriminated against, 44% of participants noted the need to target resources to the Black, Indigenous, and People of Color (BIPOC) communities. One related comment emphasized the need to address the disparity in housing for the BIPOC communities by way of opportunities through government programs to aid in redistribution of wealth, allowing these communities to be able to afford better quality housing.

Comments at the public hearing were in favor of the following funding allocations: 36% for supportive services, 32% for affordable rental housing development, 21% for tenant based rental assistance, and 11% \ for the development of non-congregate shelter. No substantial feedback on these suggested funding allocations were provided at the public hearing. However, participants inquired about the size of non-congregate shelters that will be built with funding. Further guidance on the RFP process after the acceptance of the allocation plan was provided.

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

Survey participants reported the following subpopulations should be prioritized for funding: 1) persons with severe mental illness, 2) households who have been chronically homeless, 3) victims/survivors of domestic violence/dating violence/sexual assault/stalking or human trafficking, 4) persons exiting the criminal justice system and 5) persons in unsheltered situations. The PJ decided not to focus funding on those with severe mental illness or who are chronically homeless as serving these high needs populations requires ample case management services and long term (ideally, permanent) housing, and thus the HOME-ARP funding available would provide minimal impact in terms of number of households served if focusing on these populations. It was determined Permanent Supportive Housing (PSH) funded through the CoC program was a better resource for these populations.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. 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.

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.**

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

About the Primary Jurisdiction – Albany City, New York

The City of Albany, located in Albany County, NY is home to 99,224 residents across nearly 22 square miles. According to data from the United States Census Bureau, the city's population is diverse with 54 percent of the population identified as White, 29 percent as Black or African American, and 7 percent as two or more races. One (1) in 10 city residents identify as Hispanic or Latino. Of the city's population, three percent are Veterans and nearly one in five residents (17 percent) are under 18 years of age. The aging population of persons 65 years and over comprise 13 percent of the total population. Of the city's population, 1 in 10 people (10 percent) of persons under the age of 65 live with a disability. Of nearly 100,000 residents, there are 41,614 households with an average household size of 2.08 persons. The Census Bureau reports that the poverty rate in the city is 23 percent according to the 2020 American Community Survey (ACS) and Puerto Rico Community Survey (PRCS), 5-Year Estimates and the 2016-2020 per capita income in 2020 dollars was \$29,664. According to the U.S. Census Bureau, American Community Survey (ACS) and Puerto Rico Community Survey (PRCS), 5-Year Estimates, the median gross rent (all unit sizes) in Albany between 2016 and 2020 was \$992 per month which is equivalent to working nearly 67 hours a week at \$15 per hour before taxes are deducted.

About the Qualifying Populations

a. Homeless as defined in 24 CFR 91.5

To understand the size and demographic composition of the homeless population as defined by 24 CFR 91.5, demographic data on these homeless clients served by the NY-503 CoC's Coordinated Entry (CE) program during the most recent HUD fiscal year were analyzed.

The following are key findings of these 470 homeless clients reported through Coordinated Entry:

- Of the 470 clients in this category, 60 percent are Male.
- Black, African American, or African client's representation (56 percent of the 470 homeless clients) is nearly double their representation in the general population (29%).
- There is a higher representation of Hispanic/Latin(a)(o)(x) clients (14 percent) than their representation in the

general population (10%).

- Nearly two-thirds of the clients (61 percent) have a disabling condition.
- One in four clients (26 percent) are chronically homeless.
- Six percent were unaccompanied youth (age 24 and under and not living with a parent/guardian), although case managers that participate in CE case conferencing believe this statistic fails to capture the true number of homeless youth as this clientele is less likely to present for services at homeless services organizations (where CE applications are filled out) and may instead, for example, live in their cars.
 - Nearly three-quarters of these youth (73 percent) are Black, African American, or African; and nearly one in three (31 percent) are Hispanic/Latin(a)(o)(x) clients – showing an even starker disparity by race and ethnicity among youth compared to the general homeless population.
 - Nearly two-thirds of the clients (65 percent) have a disabling condition.
 - More than one in five clients (23 percent) are chronically homeless.

Looking at the HMIS APR for the most recent HUD fiscal year, totaling 7,986 clients:

- 16% percent have physical disabilities
 - One in ten of these clients (10 percent) are chronically homeless.
- 84 clients reported exiting a criminal justice institution prior to homelessness.

Persons with Criminal Justice Involvement

The data on this population in the CARES' Collaborative HMIS are extremely limited because experience with the criminal justice system is not a required data point. Instead, HMIS captures data on prior residence, which at times will indicate involvement with the criminal justice system. Looking at HMIS data from the most recent HUD fiscal year, 84 of 7,986 clients identified their current or previous residence as a “jail, prison, or juvenile detention center”.

The following are key findings on these 84 clients who self-reported prior or current incarceration:

- 8 in 10 clients (or 88 percent) in this group are Male; one percent is Transgender.
- Almost two-thirds (61 percent) of clients in this group are Black, African American, or African clients.
- One in twenty clients (6 percent) are Hispanic/Latin(a)(o)(x).
- Nearly half (46 percent) of the clients have a disabling condition- this data point is missing for 7 percent of clients.
- One in twenty clients (5 percent) are chronically homeless.

Persons Experiencing Unsheltered Homelessness

The size of the unsheltered population is trending a continuous increase. Across New York, the unsheltered homeless population has increased 24 percent between 2011 and 2020. However, during the same time frame in Albany County the unsheltered population increased by 64 percent.

Veterans

From analyzing data included in the Annual Performance Report (APR) for Albany City & County CoC programs entering data in the CARES Collaborative Homeless Management Information System (CCHMIS), more than three quarters (76 percent) of Veterans exit programs to a permanent destination - more than double the general CoC population of clients exiting programs (36 percent), showing a lesser need for new resources targeted to veterans compared to other subpopulations.

b. At Risk of Homelessness as defined in 24 CFR 91.5

The following are key findings about the at risk of homelessness clients (109 clients on the Coordinated Entry List for prevention assistance) between October 1st, 2020 (the start of the CE prevention program) and June 7th, 2022. It should be noted that until January 15, 2022, there was an eviction moratorium in place in New York State, and thus the total numbers of those presenting as at-risk of homelessness are likely much lower than the actual number. The CoC expects a significant increase in persons presenting for eviction prevention services, with the moratorium no longer in place, in late summer or early fall.

- 73 percent of clients are Female heads of households.
- Black, African American, or African clients' representation (72 percent of 109 clients) is more than double their representation in the general population (29%).
- 40% of households report a disabling condition.
- 34% of households report being between 30-50% AMI.
- 6 percent of households are youth ages 18-24.

Another data source to assess the need for prevention services using HOME ARP funds is a review of the NYS Emergency Rental Assistance Program (ERAP) data. As of June 2022, 4,752 households in Albany County applied for ERAP assistance with rental arrears.¹ Per NYS's report on ERAP Applicant Demographics², 61% of applicants outside of New York City earned less than 30% of AMI. Using this data point, we guestimate approximately 2,899 households that applied for ERAP were below 30% of AMI ($4,752 \times 61\% = 2,899$). Given close to 50% of applications have had ERAP³ payments to date in Albany County, we can assume there are at least 1,450 households in Albany County that are currently at-risk of homelessness and below 30% AMI ($2,899 \times 50\% = 1,450$). Per NYS OTDA's ERAP Applicant Demographics report, the vast majority of households applying for ERAP outside of NYC are female (65%), Non-Hispanic/Latin(a)(o)(x), and disproportionately Black or African American (36%).

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

Albany Victim Service Provider's comparable database (EmpowerDB utilized by Equinox, Inc. at Project Breakfree and Equinox DV Shelter) reported 418 clients residing in emergency shelter or transitional housing programs during the previous calendar year (January 2020 – December 2021). Of these 418 clients, 106 clients resided in Transitional Housing programs and 312 in Emergency Shelter programs. The below are key findings on these 418 clients fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking:

- Of the 279 adult clients, 91 percent are female, 7 percent are male, and 2 percent are Transgender.
- Of the 139 child clients, nearly two-thirds (62 percent) are male, and 37 percent are female.
- The representation of Black, African American, or African clients in this group (56 percent) is nearly double the demographic's representation in the general population.
- Ten percent of clients are Hispanic/Latin(a)(o)(x) (likely an undercount due to missing data).
- Five percent of all clients have at least one physical or mental health condition, but this value may be underreported due to missing or incomplete data.
- Six percent of all clients served are chronically homeless.
- Ten percent of clients (heads of households) are youth under age 25.

¹ NYS OTDA ERAP, [County by Zip Code ERAP Application Counts, Through June 5, 2022](#)

² NYS OTDA ERAP, [ERAP Application Demographics, Through June 6, 2022](#)

³ NYS OTDA ERAP, [County ERAP Payments, Through June 6, 2022](#) – 2,308 rental arrear payments have been made in Albany County, compared to 4,752 applications.

d. 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

- (1) Households who have previously been qualified as ‘homeless’ and are currently housed due to temporary or emergency assistance, including financial assistance, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness:

While there is no existing quantitative data source to measure the number of households that would meet these criteria, CoC Coordinated Entry Program leadership reported most households that would fall into this category (i.e. households that are supported with time-limited CoC Rapid Rehousing assistance) are able to transition to stable housing and self-sustain, or are connected through Coordinated Entry to Permanent Supportive Housing. While we are unable to provide statistics on this category of households, we know from the CE Lead agency the pool of households that fall into this category and would need assistance through HOME-ARP is extremely small.

- (2) Households at greatest risk of housing instability because the household:
- a. has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs):

According to 2014-2018 Comprehensive Housing Affordability Strategy (CHAS) data (the most recent available), 11,765 households in Albany County earn less than 30% area median income and are severely cost burdened. Of these households, 9,495 are renters and 2,270 are homeowners. While demographic data is unavailable for this population, using available Albany County poverty and homeless data, we guesstimate this population is disproportionately people of color and Hispanic/Latin(a)(o)(x).

- b. has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5:

Coordinated Entry prevention assessments conducted between January 2022 and May 18, 2022 report 32 percent of the households assessed (31 of 98 households) had annual incomes between 30 and 50 percent of AMI. This low household income puts them at imminent risk of homelessness in the face of inflation and rising rents following a global pandemic. The specific data on these households is as follows:

- Of the 31 adult clients, 87 percent are female, 13 percent are male, and 0 percent are Transgender.
- The representation of Black, African American, or African clients in this group (81 percent) is nearly double the demographic’s representation in the general population.
- 0 percent of clients are Hispanic/Latin(a)(o)(x), although data for this metric was not collected on 4 households.
- 26 percent of all clients have at least one physical or mental health condition, but this value may be underreported due to missing or incomplete data.
- 6 percent of clients (heads of households) are youth under age 25.

Another data source to assess the need for prevention services using HOME-ARP funds is a review of the NYS Emergency Rental Assistance Program (ERAP) data. As of June 2022, 4,752 households in Albany County applied for ERAP assistance with rental arrears⁴. Per NYS's report on ERAP Applicant Demographics⁵, 24% of applicants outside of New York City (Albany County in this grouping) were between 30% and 50% of AMI. Using this data, we estimate approximately 1,140 households that applied for ERAP had incomes between the 30% and 50% of AMI ($4,752 \times 24\% = 1,140$). Given close to 50% of these applications had ERAP⁶ payments made to households in Albany County, we estimate there are at least 570 households in Albany County that are currently at-risk of homelessness and between 30% and 50% AMI ($1,140 \times 50\% = 570$). Per NYS OTDA's ERAP Applicant Demographics report, the majority of households applying for ERAP outside of NYC are female (65%), Non-Hispanic/Latin(a)(o)(x), and disproportionately Black or African-American (36%).

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):

Congregate and Non-congregate Shelter Units

The Albany City & County CoC 2021 Housing Inventory Count (HIC) reports 16 emergency shelter programs in Albany County. Of these 16, one is non-congregate and focused on serving victims of domestic violence (with 7 units and 15 beds), and two programs have non-congregate availability focused on serving families (St. Catherine's Center for Children – 24 units with 79 beds; and Schuyler Inn, with fluctuating availability of units). On the night of the Point in Time (PIT) count, there were 36 overflow emergency shelter beds utilized in hotels/motels, as supported by the Albany County Department of Social Services and VA Emergency Housing Voucher programs. Outside of those programs, there are 11 emergency shelter programs that provide 438 beds – all of which are congregate. The largest shelter, the City Mission of Albany, provides over 200 beds/cots in a congregate setting. As such, three out of the 16 emergency shelter programs and approximately 30% of shelter beds in Albany County are non-congregate, and focused on serving victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking; and families. Looking at the 2018 and 2019 HIC (pre-pandemic, to take into consideration staffing and distancing challenges during the pandemic), congregate shelters are regularly at capacity (at least 90% full).

Supportive Services

According to the FY2021 Grant Inventory Worksheet (GIW) published by HUD, the Albany City & County CoC, with most programs located in the City of Albany, received \$109,405 to fund two Support Services Only programs. In addition to the funding allocated to Support Services Only programs, support services were funded in 18 other programs for a total of \$822,447 to provide case management to those in CoC housing programs. Between the 20 programs receiving funding to provide support services, the total amount towards supportive services was \$924,451 or approximately \$46,000 per program allocated. Across the total GIW funding allocation of \$5,876,436 and 28 programs, half of the funding (\$2,917,800 or 50%) was allocated to rental assistance, 16 percent toward supportive services, and 17 percent to leasing. This support services funding is complemented by the approximately \$800,000 of prevention funds across other funding streams such as Emergency Solutions Grants and Community Development Block Grants. Unfortunately, approximately 80 percent of this prevention funding was a one-time allocation (not recurring) through the coronavirus relief

⁴ NYS OTDA ERAP, [County by Zip Code ERAP Application Counts, Through June 5, 2022](#)

⁵ NYS OTDA ERAP, [ERAP Application Demographics, Through June 6, 2022](#)

⁶ NYS OTDA ERAP, [County ERAP Payments, Through June 6, 2022](#) – 2,308 rental arrear payments have been made in Albany County, compared to 4,752 applications.

programs like ESG-CV and CDBG-CV. Through NYS's Emergency Rental Assistance Program (ERAP), as of June 2022 an additional \$18 million has been provided in rental arrears/payments to Albany County residents⁷ - another rent relief program that will not renew for the community.

Tenant Based Rental Assistance (TBRA)

According to the 2021 Housing Inventory Count (HIC) data, there are 29 tenant based Rapid Re-Housing and Permanent Supportive Housing projects in the Continuum of Care with a total of 874 beds of which 99 percent were occupied during the PIT. Albany Housing Authority (AHA) provides 2,200 Housing Choice vouchers in the City of Albany – all of which are regularly at capacity. The current waitlist for AHA housing includes 13,241 people⁸, or 13% of the City of Albany population.

Affordable Housing

According to the City of Albany Subsidized Housing Report produced by the Albany Housing Authority, data collected during the Spring of 2017 showed that when excluding VASH vouchers and Continuum of Care rental assistance, the City of Albany had 3,113 units of subsidized housing. Data from the Census's 2020: ACS 5-Year Estimates Detailed Table states there are more than 48,000 units in the City of Albany, however nearly 6,000 of those are vacant. Based on those estimates, less than 8 percent of units in the City of Albany are subsidized units.

According to the 2021 Housing Inventory Count (HIC), Albany County boasts 34 Permanent Supportive Housing (PSH) programs, including 826 beds. 15 of these programs, providing 222 beds, are site-based; and 19 of these programs, providing 604 beds are tenant based, requiring identifying an affordable unit in the community to utilize the provided rental assistance. Albany Housing Authority (AHA) also provides 1800 Public Housing Units in the City of Albany – all of which are regularly at capacity.

Describe the unmet housing and service needs of qualifying populations:

a. Homeless as defined in 24 CFR 91.5

The primary unmet needs for the homeless population that the community identified as a priority for funding are: tenant based rental assistance (housing); affordable rental housing development (housing); non-congregate shelter; and staff training to ensure shelters and housing produce affirming/safe environments for the LGBTQ+ population and conduct targeted outreach to serve racial and ethnic minorities (services). 65% (seventeen (17) of twenty-six (26)) stakeholder respondents and 77% (or fourteen (14) of eighteen (18)) public survey respondents recommended prioritizing the homeless qualifying population for HOME-ARP funding over other qualifying populations.

Data analysis indicates an unmet housing need for persons experiencing homelessness in Albany County as the homeless system (emergency shelter, transitional housing, rapid rehousing, and permanent supportive housing) is at full capacity (Table 1 below); CE admissions outpace discharges more often than not (Table 2 below); the average length of time homeless is 90 days (Table 3 below); and less than one-third of households exit from shelter to permanent destinations (Tables 4 & 5 below). One way to quantify this housing need is to assess the number of clients exiting the homeless system to temporary destinations. The most recent Longitudinal Systems Analysis (LSA) data shows of the 990 households that exited a CoC program, only 28 percent exited to a permanent destination and 594 exited to a temporary destination, meaning a destination for which the arrangement is time limited (for example, staying with family or friend for a couple weeks). These exits to temporary destinations are

⁷ NYS OTDA ERAP, [County by Zip Code ERAP Application Counts, Through June 5, 2022](#)

⁸ Albany Housing Authority survey response as part of the HOME-ARP stakeholder feedback process

arguably because of the lack of affordable and/or permanent supportive housing or rental assistance available, showing the need for affordable rental and supportive housing and rental assistance for an additional 594 households.

The Current System is at Full Capacity

As noted in the table below, the homeless sheltering/housing system in Albany County is at full capacity, ranging between 90% and 100% of beds filled at any given time. This data point shows more units of affordable rental housing, and more units of supportive housing (96% units filled) are needed to reduce persons living in shelter and transitional housing.

Table 1:

THE SYSTEM IS NEARLY AT FULL CAPACITY					
NY-503 System Utilization	TH	RRH	ES	PSH	SYSTEM
Total Beds	151	278	584	826	1,839
PIT Count	136	278	538	797	1,749
Utilization Rate	90%	100%	92%	96%	95%

Current Bed Utilization by Program Type
Source: 2021 Housing Inventory Chart (HIC)



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4/22/2022

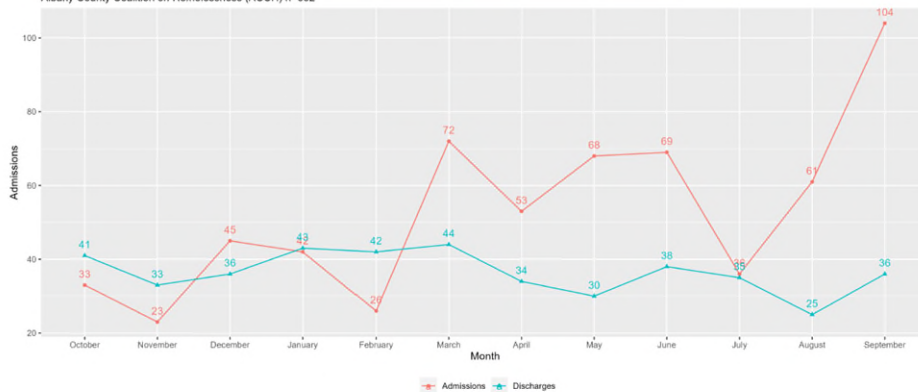
Admissions Outpace Discharges

The below table shows that – more often than not (7 out of 12 months) – admissions of homeless households into the Coordinated Entry system outpace discharges. This data further supports the need for housing and services in Albany County to address homelessness.

Table 2:

7 OUT OF 12 MONTHS ADMISSIONS OUTPACE DISCHARGES – THE NEED FOR HOUSING IS GREATER THAN THE SUPPLY

Coordinated Entry Activity Between 2020 and 2021
Albany County Coalition on Homelessness (ACCH) n=632



4/22/2022

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High Average Days Homeless

According to the Longitudinal Systems Analysis (LSA) data for the most recent HUD fiscal year, the average days homeless across 1,252 households was 90 days. For households with adults and children, the average length was 100 days. Homelessness takes on average three months to address in the community so by increasing the number of affordable rental and supportive housing units and rental assistance, community and governmental organizations can reduce the length of time clients are homeless. As a point of comparison, per the CoC Interim Rule (578.71), High Performing Communities have average lengths of time homeless of less than 20 days. Albany is missing this mark by 70 days.

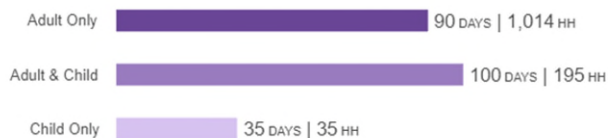
Table 3:

IT TAKES ON AVERAGE THREE MONTHS TO HOUSE A CLIENT

Average Days Homeless

The average cumulative, unduplicated number of days that households were served in ES, SH, or TH projects; and days in RRH or PSH prior to move-in.

90
DAYS Homeless
1,252 HH



6/16/2022

Source: Longitudinal Systems Analysis (LSA) from CCHMIS Data (10/01/2020 – 09/30/2021)

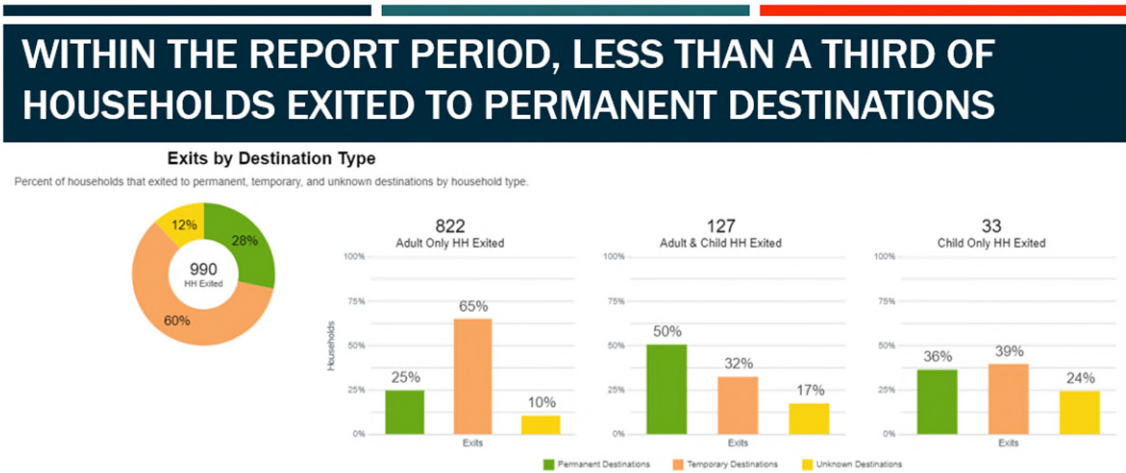
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Low Exits to Permanent Destinations

Table 4 below shows 60% of households exited the homeless system to a temporary destination (meaning a housing arrangement that is temporary) in FY2021, exemplifying a need for more affordable rental and supportive housing. The limited housing supply creates a loop of demand because clients are only temporarily stabilized and will likely return to homelessness. The problem of clients having limited permanent destinations and/or rental assistance is not a new problem to the community. The LSA data shows that one-third or fewer of households that exited a program in the last three years exited to a permanent destination. The highest recent share of households exiting to permanent destinations was 33 percent in 2019 - showing a need across years and not solely due to the COVID-19 pandemic.

Table 4:



EXITS TO PERMANENT DESTINATIONS HAS NOT RETURNED TO 2019 LEVELS

Exits to Permanent Destinations Trend

Number of households that exited from the homeless system and percent that exited to permanent destinations within each of the past three years.



6/16/2022

Source: Longitudinal Systems Analysis (LSA) from CCHMIS Data (10/01/2020 – 09/30/2021)

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This need for additional housing services was corroborated by Albany Housing Authority (AHA), which provided the opinion that, while there was a need for funding in all eligible activities, priority should be given to TBRA. Prioritization of TBRA funding would assist both landlords (such as the AHA) and tenants, which would provide sustainability for homeless and at-risk households within the qualifying populations. In addition to prioritizing TBRA, AHA recommended considerable funds be allocated to support services to ensure clients moving in with vouchers receive case management and other services to maintain housing stability. Multiple stakeholders also reported during the stakeholder forum and survey, a need for affordable rental housing development, as homeless clients with vouchers in hand have been unable to find affordable units to marry rental assistance with, and as a result, remain homeless.

Housing for Youth

Outside of the general homeless population, one of the subpopulations in greatest need of affordable rental housing and life supports is homeless youth ages 18-24. According to the Albany City & County CoC's 2021 Housing Inventory Count (HIC), the community has 16 housing beds dedicated to homeless youth – 8 Rapid Rehousing (Equinox's Project Independence) and 8 Transitional Housing (Equinox's Transitional Living Program). According to the Annual Performance Report of the Albany City & County CoC Coordinated Entry Program for the time period October 1, 2020 to September 30, 2021, 6% (28) of those experiencing homelessness⁹ were unaccompanied youth. Community stakeholders report the 28 youth counted through Coordinated Entry underrepresents the actual number of homeless youth and therefore even more youth need housing. This undercount results because typically youth do not present to the "system" for services and therefore are never captured in data. Instead, they survive by living in cars or couch surfing. HMIS data shows that only one in five youth exit the homeless system to a positive housing destination¹⁰ – compared to 35% of all populations¹¹, further showing a need for permanent housing destinations

⁹ CARES Collaborative Homeless Management Information System (CCHMIS), NY-503 CoC Coordinated Entry APR, Federal Fiscal Year 2021

¹⁰ CARES Collaborative Homeless Management Information System (HMIS), Annual Performance Report of All CoC Programs in HMIS, Youth Exit Destination

¹¹ FY2021 HUD Systems Performance Measure Report, NY-503 Albany City & County CoC

dedicated to youth. As a point of comparison for other homeless subpopulations, according to the CoC's 2021 HIC there are 211 beds dedicated to homeless Veterans (22 homeless veterans entered Coordinated Entry in federal FY2021) and 231 beds dedicated to the chronically homeless (122 chronically homeless persons entered Coordinated Entry in federal FY2021). While youth represent a smaller subpopulation of those experiencing homelessness than Veterans or those experiencing chronic homelessness, this data shows much more limited housing resources for youth compared to other subpopulations. The need to develop affordable housing for youth was confirmed and supported through both the stakeholder survey and feedback from Albany Housing Authority. The need for LGBTQ+ affirming services and housing for the youth population was emphasized by stakeholders, as the Albany's homeless youth population is disproportionately LGBTQ+ (estimated 40% of homeless youth).

Housing with Accommodations for Persons with Physical Disabilities

Another major unmet need related to homelessness is the lack of accessible units for persons with physical disabilities. According to the American Community Survey administered and published by the US Census Bureau, 92 percent of the nearly 50,000 housing units in the City of Albany were built prior to 1990. This date is significant because the Americans with Disability Act (ADA) was signed in July 1990 meaning nearly all of the 50,000 housing units in Albany are not ADA compliant and not an option for persons with physical disabilities. These older units are inaccessible both at the point of entry and within the units. The high cost of renovations to become ADA compliant is a barrier and disincentive for landlords to make accommodations thereby limiting the supply of housing for the need. During the stakeholder forum, United Tenants of Albany noted the need for acknowledging and serving the elderly and persons with physical disabilities as potential subpopulations for preferencing or targeted funding. Other stakeholders agreed, noting the extreme difficulty finding affordable, accessible housing in the City of Albany. As such, the primary unmet need for this population is affordable, accessible rental housing units.

Persons with Criminal Justice Involvement

Stakeholders report persons with criminal justice involvement present a unique and challenging need in Albany County. For persons exiting the criminal justice system, they face many challenges and obstacles to finding stable housing. For some, their criminal history may exclude them from shelter or housing due to an organization's or landlord's policies (for example, policies to not serve those with sex offender status). In addition to overcoming the hurdle of available, affordable rental housing, obtaining a sustainable income is the next hurdle for housing stability for this population. In many cases, clients are unable to become gainfully employed due to a combination of their criminal history and limited skill set from time spent out of the workforce. Additionally, as reported by HATAS (a local homeless housing and service provider that operates the only supportive housing dedicated to persons exiting the criminal justice system) and confirmed by Coordinated Entry participants, those exiting the criminal justice system tend to score low on the Coordinated Entry (CE) vulnerability tool as they are unlikely to be chronically homeless-a priority population (having just left an institution), resulting in falling to the bottom of the CE waitlist. The HMIS program lists 84 clients who identified their current or previous residence as a "jail, prison, or juvenile detention center" in the most recent federal fiscal year - A number believed to be an extreme undercount of involvement in the criminal justice system, as it only captures those whose immediate previous residence was jail, prison, or juvenile detention center.

Given the challenges associated with finding stable housing for persons with criminal justice involvement and the upwards of 84 clients presenting as homeless directly from a criminal justice institution, a need for housing that prioritizes those with criminal justice involvement is an unmet need in Albany. This unmet need was confirmed as a primary need by stakeholder and public surveys and forums. 53% or fourteen (14) out of twenty-six (26) respondents on the stakeholder survey reported a need to target resources to this population; above thirteen other possible subpopulations. 61% of public participants, which equates to eleven (11) of the eighteen (18) respondents, also reported a need to target resources to persons exiting the criminal justice system. Discussions with the AHA and

participants at the stakeholder forum agreed that persons exiting the criminal justice system are at-risk of homelessness as landlords are hesitant to take on such tenants. Unmet needs related to this population include housing targeted to those with criminal justice involvement and ongoing case management services.

Persons Experiencing Unsheltered Homelessness

Between 2019 and 2022, the number of persons experiencing unsheltered homelessness per the Point-In-Time (PIT) Count increased from 34 to 67 persons. This trend demonstrates the need for programs that support transitions to emergency housing options/places meant for human habitation – including the option of non-congregate shelter for clients who are unwilling to stay in a congregate setting. 73%, or nineteen (19) out of twenty-six (26) respondents of the stakeholder survey reported the need to target resources for persons experiencing unsheltered homelessness out of thirteen subpopulations. 55%, or ten (10) out of eighteen (18) public survey respondents also reported a need to target resources to this subpopulation. Unmet needs for this population include support services, non-congregate shelter, and permanent supportive housing.

LGBTQ+ community (emphasizing disparities in homelessness)

Stakeholder survey respondents and forum attendees confirmed there is a need for shelter and housing programs that are actively affirming of and staff who are well trained in serving the LGBTQ+ community. Specifically, Pride Center of the Capital Region, which promotes the well-being of all lesbian, gay, bisexual, transgender and queer-identified people and those affected by discrimination based on gender identity and expression, noted that among all homeless youth, 40% identify as LGBTQ+. Per a Capital Region Youth Point In Time (PIT) Count conducted in 2018, the most cited reason for youth homelessness was conflict with a parent or guardian; anecdotally, it was often reported this was due to the youth's LGBTQ+ status. National data supports the need for specialized training when supporting persons who are LGBTQ+ due to their unique experiences. According to a 2020 study by the Williams Institute at UCLA School of Law using data from the 2017 National Crime Victimization Survey, members of the LGBTQ community are four times more likely to be a victim of violent crime. In addition, the same study reported members of the LGBTQ community are often survivors of sexual violence or domestic violence which further increases their need for safe and affordable housing while potentially requiring additional support services for other social/emotional unmet needs. The CDC's National Intimate Partner and Sexual Violence Survey (ongoing) found that LGB people experience rape, physical violence, or stalking by an intimate partner at much higher rates than heterosexual people. The 2015 U.S. Transgender Survey results showed nearly half of transgender people (47 percent) have been sexually assaulted. Support services such as hormone therapy for transitioning clients, trauma counseling, support groups, health care for HIV/AIDS, and transportation to services are vital for this population. While there is not data on the number of homeless persons that identify as LGBTQ+ in Albany County (as it is prohibited from asking about sexual orientation during intake to services), the stakeholders at the forum voiced the need for the above referenced support services and emergency and permanent housing resources for this population.

Racial minorities (emphasizing disparities in homelessness)

There are racial disparities prevalent in the homeless population in Albany County which identify a need for some correction. For example, while Black, African American, or African persons represent 29% of Albany County's population, they represent 56% of persons in the homeless system.¹² Stakeholder forum attendees and public survey respondents verified repeatedly that people of color are disproportionately impacted by homelessness and housing instability. 44% of participants of the public survey reported the need to target resources to Black, Indigenous, and People of Color (BIPOC) as they are an underserved population and overrepresented in the homeless population. These data points prove the need aka correction for affordable rental housing and rental assistance that target zip codes overrepresented by racial minorities. The community also recommended staff training for homeless housing providers to ensure affirmative outreach to racial minorities is being done to promote housing resources.

b. At Risk of Homelessness as defined in 24 CFR 91.5

The primary unmet need for the at-risk of homelessness population that the community identified as a priority for funding is eviction prevention assistance (services). For the long term, affordable rental housing will need to be developed to prevent risk of homelessness (housing).

One way to assess the at-risk of homelessness population's unmet housing and service needs is by looking at NYS Emergency Rental Assistance Program (ERAP) data. Per this data, we can assume there are at least 1,450 households in Albany County that are currently at-risk of homelessness that are below 30% AMI and have yet to be served¹³. This translates to an immediate need for \$11.3 million¹⁴ in rental arrears to prevent imminent evictions. Long-term, additional affordable rental housing units will need to be built and maintained to prevent such potential evictions for low-income households. Outside of CoC funded programs - which are targeted to the most vulnerable homeless citizens - there are less than 3,200 subsidized rental units¹⁵ compared with 22,682 plus persons living in poverty¹⁶ resulting in the insufficient supply of affordable rental housing in the city of Albany for this population. Exacerbating this supply issue is the extremely limited vacancy in the CoC shelter and housing inventory.

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

The primary unmet needs for those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking the community identified as a priority for funding are: tenant based rental assistance (housing); affordable rental housing development (housing); and training to ensure shelters and housing produce affirming/safe environments for the LGBTQ+ population and conduct targeted outreach to serve those in racial and ethnic minorities (services).

There is currently one CoC-funded Rapid Rehousing project specifically serving victims of domestic violence in Albany County (Equinox's Project Break Free) that, according to the 2021 Housing Inventory Count, can support approximately 21 families (with 62 people in them) and 11 singles (for a total of 73 clients). In the data provided from the Victim Service Provider's comparable database, 312 clients were in the agency's Emergency Shelter programs in 2021. This presents an unmet need of approximately 239 clients in need of housing. Another way to

¹² CARES Collaborative Homeless Management Information System (HMIS), Annual Performance Report of All CoC Programs in HMIS,

¹³ See *Describe the size and demographic composition of qualifying populations within the PJ's boundaries, At Risk of Homelessness* section.

¹⁴ NYS OTDA ERAP, [County ERAP Payments, Through June 6, 2022](#) – Average payment in Albany County has been \$7,845.

¹⁵ City of Albany Subsidized Housing Report produced by Albany Housing Authority, 2017

¹⁶ [2021 Albany County Census Estimates](#)

show need for this population is from analyzing Victim Service Provider Annual Performance Reports (APR) and Consolidated Annual Performance and Evaluation Reports (CAPER) data from the previous calendar year. Across the 337 clients experiencing domestic violence who exited one of the agency's programs, only 29 percent exited to a permanent destination with 22 percent (74 clients) exiting to temporary destinations. Ongoing services (I.e. safety planning, employment services) are needed to support this population as clients transition from shelter to housing. Additionally, this population would benefit from shelter, housing, and service providers being trained in how to affirmatively and safely serve the LGBTQ+ community and how to conduct targeted outreach to serve those in racial and ethnic minorities, for the same reasons described above under the 'homeless population' section. When asked about subpopulations to target for assistance, stakeholder survey respondents and Albany Housing Authority also emphasized this population (those fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking) should be prioritized.

d. 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

Those falling into the 'other populations' categories were ranked last for targeting HOME-ARP funding by stakeholder and public survey respondents. The stakeholders identified a need for: tenant based rental assistance (housing), affordable rental housing development (housing), and eviction prevention assistance (services) to support the category of other populations.

- (1) Households who have previously been qualified as 'homeless' and are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

While there is no existing quantitative data source to measure the number of households who would meet these criteria, CoC Coordinated Entry leadership has reported most of those households that would fall into this category (i.e. households that are supported with time-limited CoC Rapid Rehousing assistance) are able to transition to stable housing and self-sustain, or are connected through Coordinated Entry to Permanent Supportive Housing. As such, we believe the unmet need for this population (both housing and services) to be minimal.

- (2) Households at greatest risk of housing instability because the household:
 - a. has annual income that is less than or equal to 30% of the area median income, as determined by HUD and is experiencing severe cost burden (i.e., is paying more than 50% of monthly household income toward housing costs); or

According to 2014-2018 CHAS data (the most recent available), 11,765 households in Albany County earn less than 30% of area median income and are severely rent cost-burdened, illustrating the need for additional affordable rental housing and rental assistance in the community (arguably, enough to support these 11,765 households), as well as services to access those resources (i.e. applying for affordable housing).

- b. has annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the conditions from paragraph (iii) of the "At risk of homelessness" definition established at 24 CFR 91.5

Of Coordinated Entry prevention assessments conducted between January 2022 and May 18,

2022, 32 percent of the households assessed (98 households) had annual incomes between 30 and 50 percent of AMI. Another way to assess this population is by looking at NYS Emergency Rental Assistance Program (ERAP) data. Utilizing this data point, we can conclude at least 570 households in Albany County are at-risk of homelessness and living between 30% and 50% AMI¹⁷. These numbers exemplify the need for rental arrear payments to prevent evictions for at least 570 households with a dollar value of approximately \$4.4 million.¹⁸ In the long term, additional affordable rental housing development is necessary to prevent ongoing risk of homelessness for households living below 50% AMI in Albany.

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

Based on the data described above regarding qualifying population demographics, current resources, and unmet housing and service needs of qualifying populations, the primary gaps within the current shelter, housing inventory, and delivery system are clear:

- 1) Non-congregate shelter – of which there are limited beds in the City of Albany - is an essential option for the increasing population of persons experiencing unsheltered homelessness (increasing from 34 to 67 persons on a single night between the 2019 and 2022 PIT counts) – who frequently are resistant to entering congregate shelters due to perceived lack of safety, severe mental illness, etc. Moreover, non-congregate shelter may address the ongoing need to ensure safe emergency housing options for persons who are transgender, persons experiencing severe mental illness, and to reduce the spread of COVID-19 and other communicable diseases. Non-congregate shelter options are found to be incredibly successful for emergency housing according to a 2020 report published by the University of Washington and the King County Department of Community and Human Services. These researchers found the clients in the non-congregate motels and hotels had greater sense of stability, increased feeling of privacy and belonging, and reduction of interpersonal conflict in a safe location that could be accessed 24/7. All these environmental benefits led to a reduction in premature program exits and returns to homelessness, more engagement with program services, and better outcomes for the clients. Since the unsheltered population typically has greater housing and health needs compared to the sheltered homeless population, non-congregate shelter is the priority need for this population. Currently, the only non-congregate shelters in Albany focus on serving victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking, and families – leaving a gap in non-congregate shelter options for other populations experiencing homelessness.
- 2) Tenant Based Rental Assistance (TBRA) is necessary for the over 200 households on the CoC's Coordinated Entry waitlist and 312 clients in Equinox's Domestic Violence Shelter¹⁹. There is an additional need for TBRA for the 11,765 households in Albany County that earn less than 30% AMI and are severely cost-burdened²⁰; and the 13% of the city of Albany population that is on the Albany Housing Authority's waitlist.

¹⁷ See *Describe the size and demographic composition of qualifying populations within the PJ's boundaries, Other Populations* section.

¹⁸ NYS OTDA ERAP, [County ERAP Payments, Through June 6, 2022](#) – Average payment in Albany County has been \$7,845.

¹⁹ Equinox's APR for 2021

²⁰ 2014-2018 CHAS data (the most recent available)

Persons with Criminal Justice Involvement

As noted above, persons with criminal justice involvement present unique challenges to housing (i.e. restrictions on housing acceptance; restrictions on employment options), and tend to not score high enough on the Coordinated Entry vulnerability index to receive housing through CoC-funded projects. As such, there is a gap in housing resources prioritizing persons with criminal justice involvement.

Racial Inequity in Homelessness

Data analysis shows a racial disparity in homelessness in Albany County. For example, while the Black or African American population represents 14% of Albany County's total population, they represent 56% of those that are homeless in Albany County according to HMIS/Coordinated Entry data. This racial disparity was repeatedly emphasized through the stakeholder forum and public survey responses. As such, there is a need to target outreach, supports and housing resources to this overrepresented demographic such as through targeting zip codes .

- 3) There is a gap in affordable rental housing, also exemplified by the 11,765 households in Albany County that earn less than 30% AMI and are severely cost-burdened²¹. This statistic (11,765 households that are very low-income and severely cost-burdened by rent) shows in and of itself the lack of affordable housing in the community needed so no one is cost-burdened. The fact that the Albany Housing Authority's waitlist represents 13% of the City of Albany's population shows at least 13% of City of Albany residents are in need of affordable housing. Anecdotal information gathered from homeless housing providers that their clients have been unable to find housing within the necessary rates – even with a subsidy/voucher in hand reinforces the gap in affordable units with the demand for them. Looking solely at affordable rental housing, a recorded 3,113 units of subsidized housing available²² is at least several thousand units short of the current demand.

Prioritizing development of housing for youth that is LGBTQ+ affirming

According to the CoC's 2021 Housing Inventory Count (HIC), the community has 16 housing beds dedicated to youth – 8 Rapid Rehousing (Equinox's Project Independence) and 8 Transitional Housing (Equinox's Transitional Living Program), presenting a need for affordable housing prioritizing youth – as confirmed by multiple stakeholders (i.e. Albany Housing Authority). This housing should be actively affirming and have staff specifically trained in serving the LGBTQ+ population, given the overrepresentation of this population among homeless youth – to ensure a safe and supportive environment.

Prioritizing development of accessible units

Stakeholder forum attendees emphasized the struggle in finding affordable, accessible housing units in Albany. This housing gap was verified anecdotally by providers at Coordinated Entry meetings, who report a hard time finding affordable accessible units for current clients.

Racial Inequity in Homelessness

Data analysis shows a racial disparity in homelessness in Albany County. For example, while the Black or African American population represents 14% of Albany County, the population represents

²¹ 2014-2018 CHAS data (the most recent available)

²² 2017 City of Albany Subsidized Housing Report produced by Albany Housing Authority,

56% of those who are homeless in Albany County according to HMIS/Coordinated Entry data. This racial disparity was repeatedly emphasized through the stakeholder forum and public survey responses. As such, there is a need to target housing resources to this overrepresented demographic (i.e. through targeting zip codes) and to boost training, ensuring affirmative outreach to minority populations overrepresented in homelessness.

- 4) There is a substantial gap in eviction prevention resources. Per NYS Emergency Rental Assistance Program (ERAP) data, we can assume there are at least 1,450 households in Albany County that are currently at-risk of homelessness who are below 30% AMI and have yet to be served²³; and at least 570 households in Albany County that are currently at-risk of homelessness and between 30% and 50% AMI²⁴. This results in a gap of funding for a total of 2,020 households in immediate need of collectively over \$15.8 million²⁵ to prevent eviction and falling into homelessness.

The data (both quantitative and anecdotal) also shows a support services gap in terms of training to reduce disparities in homelessness. Specifically – given the overrepresentation of LGBTQ+ persons in homelessness compared to total population – there is a need for training to ensure all shelters and homeless housing programs in Albany are actively LGBTQ+ affirming. This need was corroborated by stakeholder survey respondents and forum attendants who reported a fear among LGBTQ+ persons experiencing homelessness in entering shelter, which is a major access point to housing opportunities. Additionally, given the overrepresentation of people of color among the homeless population in Albany, there is a case to be made for staff and system wide training to first explore unintentional service delivery practices which are contributing to this disparity and then how to correct for this problem. 44% of survey respondents noted people of color as a subpopulation or demographic overrepresented in homelessness and in need of targeted resources.

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:

N/A

Identify priority needs for qualifying populations:

While the needs of the qualifying populations will exceed HOME-ARP funding available, below is a summary of the primary needs for qualifying populations. These primary needs reflect stakeholder and public survey results, showing favor for funding all eligible activities. The primary needs listed below also incorporate the specific needs identified through data analysis and stakeholder and public input regarding the qualifying populations and any subpopulations that need these resources.

Homeless as defined in 24 CFR 91.5

The two primary needs identified for the homeless population in Albany are additional rental assistance (TBRA) and affordable rental housing development (especially accessible units) – to potentially utilize in conjunction with rental assistance/vouchers. There is a specific need for housing that prioritizes youth and persons with criminal justice

²³ See *Describe the size and demographic composition of qualifying populations within the PJ's boundaries, At Risk of Homelessness* section.

²⁴ See *Describe the size and demographic composition of qualifying populations within the PJ's boundaries, Other Populations* section.

²⁵ NYS OTDA ERAP, [County ERAP Payments, Through June 6, 2022](#) – Average payment in Albany County has been \$7,845.

involvement. Services are needed to train homeless shelter and housing providers on how to be LGBTQ+ affirming and how to address racial disparities in homelessness in order to better engage and serve these populations to achieve housing stability.

At Risk of Homelessness as defined in 24 CFR 91.5

The most immediate need for the at-risk of homelessness population in Albany is eviction prevention resources.

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

The primary needs for those fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking are additional rental assistance (TBRA) and affordable rental housing development (especially accessible units) – to potentially utilize in conjunction with rental assistance/vouchers. Services are needed to train homeless shelter and housing providers on how to be LGBTQ+ affirming and how to address racial disparities in homelessness.

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

As confirmed by Coordinated Entry leadership, there is limited need for households who previously qualified as ‘homeless’ and are currently housed with temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance, and who need additional housing assistance or supportive services to avoid a return to homelessness.

For households at greatest risk of housing instability because the household has annual income less than or equal to 30% of the area median income and is severely cost burdened (i.e., is paying more than 50% of monthly household income toward housing costs), there is a need for additional tenant based rental assistance and affordable rental housing development to help these vulnerable households. However, stakeholders (per surveys and the forum) expressed HOME-ARP resources should be targeted to those experiencing homelessness over this housing instable population, given the limited resources available.

For households that have an annual income that is less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the conditions from paragraph (iii) of the “At risk of homelessness” definition established at 24 CFR 91.5, the greatest need is eviction prevention resources.

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:

Data Sources

Data was collected from the following public and private sources:

- CARES Collaborative Homeless Management Information System (CCHMIS)
 - Annual Performance Reports (APR)
 - System Performance Measures (SPM) Report
 - Report Builder Database Queries
- Stella P Module of HDX2 from submitted Longitudinal Systems Analysis (LSA) data
- Annual Performance Report (APR) and Consolidated Annual Performance and Evaluation Report (CAPER) data from the Empower Database of Albany’s Victim Service Provider Agency (Equinox)
- Housing and Urban Development (HUD)
 - Housing Inventory Count (HIC) Reports
 - Point-in-Time Count (PIT) Reports

- Comprehensive Housing Affordability Strategy (CHAS)
- United States Census Bureau
 - Decennial Census
 - American Community Survey
- Data from the Albany Housing Authority
 - City of Albany Subsidized Housing Report produced by Albany Housing Authority, 2017
- NYS Emergency Rental Assistance Program (ERAP)
- BBC Research and Consulting
 - ReZone Albany Housing Study - Housing Market Review: City of Albany
- Center for Disease Control (CDC)
 - National Intimate Partner and Sexual Violence Survey
 - Life Expectancy by Census Tract Estimates
- University of Washington
 - Impact of Hotels as Non-Congregate Emergency Shelters
- UCLA Williams Institute School of Law
 - Victimization rates and traits of sexual and gender minorities in the United States: Results from the National Crime Victimization Survey, 2017

Methodology

The starting point for the analysis team was completing the Homeless Needs Inventory and Gap Analysis Table and the Housing Needs Inventory and Gap Analysis Table in the HOME-ARP Allocation Plan Template. The findings from completing the two tables warranted further data exploration. The most used data source to identify the gaps in housing and delivery of services was the HMIS database administered by CARES of NY, Inc – including data from the Coordinated Entry system that is captured in HMIS. The analysis team performed Exploratory Data Analysis (EDA) on the HMIS data entered by the programs in the City of Albany to identify potential variables that inform the gaps in the system. The EDA was not limited to purely HMIS data but included data from all the above sources. Following the EDA, the analysis team narrowed down the findings into key points addressing qualifying activities and qualifying populations. Throughout the entire process, the analysis team followed the data and continued to research further into the needs and characteristics of the qualifying populations and where gaps exist in the community. The team also conducted a survey of and hosted a forum/meetings with major stakeholders including affordable housing developers (i.e. The Community Builders), the Albany County Continuum of Care, homeless providers (Interfaith Partnerships), providers serving victims/survivors of domestic violence, dating violence, sexual assault, stalking, and human trafficking (Equinox), veterans’ groups (Stratton VAMC), Albany Housing Authority, other agencies that address the needs of the qualifying populations, and organizations that address fair housing (Citizen Action of New York, Legal Aid Society of Northeastern NY), civil rights (Citizen Action of New York, Pride Center of the Capital District), and the needs of persons with disabilities (i.e. CAPS). The collected and analyzed data and survey results were presented to and utilized to guide a conversation during a stakeholder forum on the highest and best uses of HOME-ARP funds to address homelessness and housing instability. A public survey and hearing resulted in additional data on the highest and best uses of HOME-ARP funds to address homelessness and housing instability.

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:

Applications for City of Albany HOME-ARP funding will be promoted via email to the CoC listserv and to all

stakeholders that participated in the HOME-ARP planning process – including homeless service providers; providers that serve victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking; veterans’ groups; Albany Housing Authority; agencies that address the needs of the qualifying populations; organizations that address fair housing, civil rights, and the needs of persons with disabilities; and affordable housing developers. The application will also be posted to CARES’ and the City of Albany’s websites.

Following a process that has been successful for allocating CoC and ESG funds, the HOME-ARP application will be developed in tandem with the CoC NOFA Committee, with final approval by the City of Albany. This process for developing the application allows service providers with on-the-ground knowledge of best practices to inform the application. CARES and the City will ensure the application reflects all preferences and requirements as outlined in this Allocation Plan. Once the application period closes, the review team, an unbiased group of community members recommended by NOFA Committee and selected by the City of Albany, will be asked to review and score applications to prioritize requests for HOME-ARP funds. Scores will be submitted to the City of Albany, and will be taken into consideration when the City of Albany makes final funding decisions.

Describe whether the PJ will administer eligible activities directly:
 The PJ (City of Albany) will not administer any eligible activities directly.

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 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. While CARES of NY, Inc. was contracted with to conduct the planning necessary to complete the allocation plan, no transfer of funds will occur until the allocation plan is approved by HUD.

CARES was contracted to conduct the required planning portion of the HOME-ARP allocation plan as CARES is the Collaborative Applicant and HMIS Lead of the Albany County CoC, as well as provides Coordinated Entry support to the CE Lead of the Albany County CoC. CARES also partners with the City to administer ESG and HOPWA funds; and regularly provides the City of Albany with necessary data on homelessness for planning purposes.

CARES role, as agreed to by the city of Albany and CARES, is to conduct all required planning activities and draft the allocation plan. Once the allocation plan is accepted, CARES will administer the RFP process and manage vouchering in partnership with the city for all projects – except development of affordable rental housing, of which the city will retain complete administration.

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.
 The following table may be used to meet this requirement.

Use of HOME-ARP Funding			
	Funding Amount	Percent of	Statutor

		the Grant	y Limit
Supportive Services	\$ 1,030,000		
Acquisition and Development of Non- Congregate Shelters	\$ 308,952		
Tenant Based Rental Assistance (TBRA)	\$ 600,000		
Development of Affordable Rental Housing	\$ 900,000		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0%	5%
Administration and Planning	\$ 500,993	15%	15%
Total HOME ARP Allocation	\$ 3,339,945		

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

As a result of the needs assessment and gaps analysis conducted, the PJ will distribute HOME-ARP funds (\$3,339,945, less 15% administrative and planning costs, resulting in \$2,838,952 available for programming) as follows:

- 1) Allocate **32%** of funds (\$900,000) to **affordable rental housing development** to serve those exiting homelessness and households fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking, focusing on creating accessible units and housing dedicated to youth.
- 2) Allocate **21%** of funds (\$600,000) to **tenant based rental assistance** to create additional housing voucher opportunities for homeless households and households fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking – prioritizing those with criminal justice system involvement.
- 3) Allocate **36%** of funds (\$1,030,000) to **supportive services** to provide eviction prevention financial assistance to households at-risk of homelessness; training for homeless services/housing providers to decrease gender, sexuality, racial, and ethnic disparities in homelessness; and staffing for coordinated entry to support referral processes in implementing HOME-ARP funding.
- 4) Allocate **11%** of funds (\$308,952) to **acquisition and development of non-congregate shelter** to create emergency housing options for those most in need.

Please note – all qualifying populations will be eligible for all activities. However, preferences will be established as noted in the below ‘preferences’ section of the plan.

1) Affordable Rental Housing Development: \$900,000 (32%)

The City of Albany will dedicate \$900,000 to leverage state and federal affordable rental housing development resources, creating units with a preference for persons exiting the homeless system and/or fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking. Clients will be accepted from a parallel Coordinated Entry (CE) system. CE will prioritize households comprised of unaccompanied youth and households with the last known address from specific zip codes to reduce racial disparities in homelessness. Funds will be utilized to incentivize and leverage creation of accessible units.

2) Tenant Based Rental Assistance: \$600,000 (21%)

The City of Albany will dedicate \$600,000 for tenant based rental assistance, with a preference for homeless households and households fleeing domestic violence, dating violence, sexual assault, stalking, and human trafficking, capping at a two-year maximum per household. The city will create a preference for households within these two qualifying populations that have criminal justice involvement. Assuming an average rent of \$1,207 per month/\$14,484 per year (FY 2022 FMR for a two-bedroom), adjusted for 30% contribution (assuming 30% AMI for a two-person household of \$23,000) this funding would serve approximately 40 households for up to two years. Households would access TBRA through a parallel Coordinated Entry (CE) system. CE will prioritize households that have criminal justice involvement and are from specific zip codes to reduce racial disparities in homelessness.

3) Supportive Services: \$1,030,000 (36%)

The City of Albany will dedicate \$600,000 to eviction prevention services for those at-risk of homelessness and up to 50% AMI. As such, this activity will serve those defined as ‘at-risk of homelessness’ and those within the

definition of ‘other populations at greatest risk of housing instability’ per the HOME-ARP notice. It is estimated this funding will serve 76 households with an average of \$7,845 in rental arrears²⁶.

The city of Albany will dedicate \$90,000 to provide shelter and homeless housing provider training, ensuring all shelters and homeless housing programs are actively LGBTQ+ affirming. This training will support all qualifying populations as agencies that operate shelters and homeless housing programs tend to also serve victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking; those at-risk of homelessness; and other populations as defined in the HOME-ARP notice.

The city of Albany will dedicate \$90,000 for annual training for shelters and homeless housing programs on affirmative outreach focusing on reducing racial and ethnic disparities in homelessness. This training will support all qualifying populations as agencies that operate shelters and homeless housing programs tend to also serve victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking; those at-risk of homelessness; and other populations as defined in the HOME-ARP notice.

The city will dedicate \$250,000 to hire Coordinated Entry (CE) staff (\$31,250/year for 8 years) to support the influx of new clients due to the additional funding. This additional staff will ensure referrals in alignment with this Allocation Plan are being made to the planned affordable rental housing developments, TBRA, and eviction prevention finances/services funded through HOME-ARP. This funding will serve all qualifying populations interested in accessing programs funded through HOME-ARP.

4) Non-Congregate Shelter: \$308,954 (11%)

The City of Albany will dedicate \$308,954 to develop non-congregate shelter. While the city does not believe this will be enough funding to create even a small non-congregate shelter, it will be useful in leveraging additional state and federal resources for the capital needed. The non-congregate shelter will be open to all qualifying populations, but it is expected to mostly serve those experiencing homelessness (especially those living in places not meant for human habitation or who do not feel comfortable entering a congregate setting); and victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking.

Additional narrative, if applicable:

Enter narrative response here.

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

The rationale for Albany’s plan is based on the data described above on the shelter and housing inventory, existing and needed service delivery system, and the needs identified in the gaps analysis. Details are below.

1) Affordable Rental Housing Development

There is a gap in affordable housing, exemplified by the 11,765 households in Albany County that earn less than 30% AMI and are severely cost-burdened²⁷; by the fact that Albany Housing Authority’s waitlist represents 13% of

²⁶ NYS OTDA ERAP, [County ERAP Payments, Through June 6, 2022](#) – Average payment in Albany County has been \$7,845.

²⁷ 2014-2018 CHAS data (the most recent available)

the total City of Albany population; and by the anecdotal information from homeless housing providers that clients have been unable to find housing within the necessary rates – even with a subsidy/voucher in hand. Looking solely at affordable housing, this need is vastly greater than the 3,113 units of subsidized housing available²⁸. The HOME-ARP funding dedicated to affordable rental housing development will help to leverage state and federal resources to bring necessary additional affordable rental housing to the city of Albany. Given the limited HOME-ARP resources, preference for the homeless population and victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking will result in necessary affordable rental housing for the city of Albany’s most vulnerable citizens – preferences supported by public and stakeholder feedback.

Prioritizing development of housing for youth that is LGBTQ+ affirming

According to the CoC’s 2021 Housing Inventory Count (HIC), currently the community has 16 housing beds dedicated to youth – 8 Rapid Rehousing (Equinox’s Project Independence) and 8 Transitional Housing (Equinox’s Transitional Living Program), presenting a need for affordable housing specifically prioritized for youth – as confirmed by multiple stakeholders (i.e. Albany Housing Authority). By creating a preference within this eligible activity, this need for housing prioritizing unaccompanied youth will in part be met.

Prioritizing development of accessible units

Attendees of the stakeholder forum emphasized the struggle in finding affordable accessible housing units. This was verified anecdotally through what CARES has heard from providers at Coordinated Entry meetings, presenting a need for more affordable accessible units. By incentivizing creation of more accessible units within this eligible activity, this need for development of accessible units will in part be met.

Addressing Racial Inequity in Homelessness

Data analysis shows a racial disparity in homelessness in Albany County. For example, while the Black or African American population represents 14% of Albany County’s total population, this population represents 56% of those who are homeless in Albany County according to HMIS/Coordinated Entry data. As such, there is a need to target housing resources to this overrepresented demographic (i.e. through targeting zip codes) and to develop and implement system training to identify and remedy practices contributing to this disparity. Prioritizing households from specific zip codes that are overrepresented with people of minority races and ethnicities within this eligible activity will be one step towards reducing the disparity and will set an important precedent for other housing programs.

2) Tenant Based rental Assistance

Tenant Based Rental Assistance (TBRA) is necessary for the over 200 households on the CoC’s Coordinated Entry waitlist and 312 clients in Equinox’s Domestic Violence Shelter²⁹. Targeting HOME-ARP resources to TBRA will potentially serve 40 households for up to two years that are coming from homelessness or a domestic violence situation, among the other qualifying populations.

Persons with Criminal Justice Involvement

As noted earlier, persons with criminal justice involvement present unique challenges to obtaining and retaining housing (i.e. restrictions on housing acceptance; restrictions on employment options), and tend to not score high enough on the Coordinated Entry vulnerability index to receive housing through CoC-funded projects. As such, there is a gap in housing resources directed specifically to persons with

²⁸ 2017 City of Albany Subsidized Housing Report produced by Albany Housing Authority,

²⁹ Equinox’s APR for 2021

criminal justice involvement.

Addressing Racial Inequity in Homelessness

Data analysis shows a racial disparity in homelessness in Albany County. For example, while the Black or African American population represents 14% of Albany County total population, this population represents 56% of those who are homeless in Albany County according to HMIS/Coordinated Entry data. As such, there is a need to target housing resources to this overrepresented demographic (i.e. through targeting zip codes) and to boost training

3) Support Services

There is a substantial gap in eviction prevention support services. Per NYS Emergency Rental Assistance Program (ERAP) data, we can assume there are at least 1,450 households in Albany County that are currently at-risk of homelessness, living below 30% AMI and have received no financial assistance; and at least another 620 households in Albany County who are currently at-risk of homelessness and living between 30% and 50% AMI³⁰. This results in a gap of funding for a total of 2,070 households in immediate need of \$16 million³¹. Allocating \$600,000 to eviction prevention resources will serve approximately 76 of these households.

The data (both quantitative and anecdotal) also shows a support services gap in terms of staff and system wide training to reduce disparities in homelessness. Specifically – given the overrepresentation of LGBTQ+ persons in homelessness – there is a need for training to ensure all shelters and homeless housing programs in Albany are actively LGBTQ+ affirming. Additionally, given the overrepresentation of people of color in homelessness in Albany, there is a need for training to address ways the homeless housing and services system may be contributing to this disparity and ways providers can correct the disparity. Allocating resources for training to address these disparities will ensure HOME-ARP resources (and other-funded housing and services for qualifying populations in the city of Albany) are affirmatively and safely serving these populations that are overrepresented in homelessness.

4) Non-congregate shelter

Non-congregate shelter – of which there is currently limited capacity for in the City of Albany - is an essential option for the increasing population of persons experiencing unsheltered homelessness (increasing from 34 to 67 persons on a single night between the 2019 and 2022 PIT counts). Moreover, non-congregate shelter may address the ongoing need to ensure safe emergency housing options for persons who are transgender, persons experiencing severe mental illness, and in an effort to reduce the spread of COVID-19 and other communicable diseases. Since the unsheltered population has the greatest set of housing and health needs, non-congregate shelter is the priority need for this population.

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 PJ anticipates developing 3-5 units of affordable housing with the funding allocated to this activity. Based on affordable housing developer feedback, it is estimated this will leverage federal and state funds to develop an

³⁰ See *Describe the size and demographic composition of qualifying populations within the PJ's boundaries*, Other Populations section.

³¹ NYS OTDA ERAP, [County ERAP Payments, Through June 6, 2022](#) – Average payment in Albany County has been \$7,845.

additional 30-50 units.

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:

The PJ anticipates developing 3-5 units of affordable housing with the funding allocated to this activity. Based on affordable housing developer feedback, it is estimated this will leverage federal and state funds to develop an additional 30-50 units. This development will be one step in developing additional accessible housing units, creating housing prioritizing youth coming from homelessness or domestic violence scenarios, and reducing the racial disparity in homelessness by prioritizing households for affordable rental housing from zip codes overrepresented with BIPOC.

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:

1) Affordable Rental Housing Development:

The city of Albany intends to give the following preferences within the affordable rental housing development eligible activity:

1. Homeless and victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking will receive a preference among the qualifying populations for affordable rental housing developed utilizing HOME-ARP funds. All qualifying populations will be able to apply.
2. Of those qualifying populations (homeless and victims of domestic violence, etc.), a portion of funds will be utilized to create housing that prioritizes youth who are homeless/victim of domestic violence, dating violence, sexual assault, stalking, or human trafficking.
3. Of those qualifying populations, households with last known address from specific zip codes that are overrepresented with Black Indigenous People of Color (BIPOC) will be prioritized.
4. The City of Albany will have a preference for funding affordable rental housing development projects which dedicate at least 20% of the total project (funded through HOME-ARP or otherwise) to creation of accessible units for those with mobility impairments.

2) Tenant Based Rental Assistance (TBRA):

The City of Albany intends to set a preference for TBRA as follows:

1. Homeless and victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking will receive a preference among the qualifying populations for HOME-ARP funded TBRA. All qualifying populations will be able to apply.
2. Of those qualifying populations (homeless and victims of domestic violence, etc.), persons with criminal justice involvement will be prioritized.
3. Of those qualifying populations, households with last known address from specific zip codes that are overrepresented with Black Indigenous People of Color (BIPOC) will be prioritized.

3) Support Services:

For the \$600,000 for eviction prevention services, the City of Albany intends to set a preference for:

1. Those At-Risk of Homelessness, as defined in the HOME-ARP notice.
2. Other populations at greatest risk of housing instability - households with annual income less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the conditions from paragraph (iii) of the "At risk of homelessness" definition established at 24 CFR 91.5.

All qualifying populations will be eligible to apply.

The support services program funded through HOME-ARP will also fund staff and system training on working with LGBTQ+ populations, identifying and correcting practices or lack of practices leading to racial disparities in homelessness, and Coordinated Entry staff to address increased volume of referrals. All qualifying populations are expected to benefit from these service investments.

- 4) Non-Congregate Shelter: there will be no preference among qualifying populations or subpopulations for non-congregate shelter. However, it is anticipated those experiencing homelessness or victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking will be most likely to apply for such shelter.

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:

The homeless population and victims of domestic violence, dating violence, sexual assault, stalking, and human trafficking are

receiving a preference for Affordable Rental Housing and Tenant Based Rental Assistance (TBRA) funded through HOME-ARP, as there is need for these populations that surpasses the amount of HOME-ARP funding available (as thoroughly described in the unmet needs and gaps sections above). While there are presenting needs for other qualifying populations – such as households below 30% AMI that are severely cost burdened – stakeholders and the public alike supported creating preferences for the homeless and victim of domestic violence, etc. populations, given these populations represent the most vulnerable in our community and the least likely to self-resolve without supports.

The city of Albany is creating a prioritization for affordable rental housing development for youth who are homeless or victims of domestic violence, dating violence, sexual assault, stalking, or human trafficking, as the unmet needs and gaps analysis show the extremely limited supply of permanent housing dedicated to youth (currently 16 beds) compared to other subpopulations, such as veterans or the chronically homeless. Prioritizing affordable rental housing for youth who are homeless or fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking will fill a void in the community, and is supported by community stakeholders and the public at large per our outreach.

The city of Albany is prioritizing affordable rental housing projects that commit to developing at least 20% of the project's units as accessible due to stakeholders reporting extreme struggles in finding housing for homeless households or victims of domestic violence if accessibility is a factor.

The city of Albany is prioritizing TBRA for persons with criminal justice involvement as stakeholder and public surveys and forum attendees reported this population as having some of the highest needs in securing and maintaining housing. Moreover, the Coordinated Entry Lead noted those exiting the criminal justice system tend to not score high enough on the CE vulnerability index to receive housing through CoC-funded programs. As such, there is a current gap in the community for this population.

Within these qualifying populations and subpopulations, the city of Albany is also creating a preference for households with a last known address in a zip code overrepresented by BIPOC. This strategy is to reduce the ongoing racial disparities in homelessness and housing instability prevalent in Albany.

The City of Albany is prioritizing eviction prevention programs within the support services category due to the community need. This activity will prioritize households at-risk of homelessness (as defined in the HOME-ARP notice) and 'other populations' at greatest risk of housing instability; households with annual incomes less than or equal to 50% of the area median income, as determined by HUD, AND meets one of the conditions from paragraph (iii) of the "At risk of homelessness" definition established at 24 CFR 91.5.' The city decided to include households up to 50% AMI who are at risk of homelessness in this preference, as over 32% of those accessing eviction prevention services through the CE prevention system are between 30 and 50% AMI. This AMI threshold is consistent with NYS ERAP data, in which 24% of applicants outside of New York City and seeking ERAP assistance earn between 30% and 50% AMI.

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).

Template:

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 and Tenant Based Rental Assistance (TBRA):

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 and TBRA 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 and TBRA projects. Data from each client's CE intake and the Vulnerability Index for each type of eligible activity (affordable rental housing and TBRA) 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 or TBRA 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.

Supportive Services – Eviction Prevention

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 eviction prevention services. All qualifying populations will be able to fill out a CE intake/application, most likely at existing eviction provider agencies. Clients that are at-risk of homelessness and up to 50% of AMI will be prioritized for HOME-ARP funded services, although all qualifying populations will be eligible to receive services.

Non-Congregate Shelter

There will not be a formal referral method for non-congregate shelter. It is expected the County Department of Social Services, shelter providers, and outreach programs will be the most frequent agencies referring clients to non-congregate shelter funded through HOME-ARP. All qualifying populations will be eligible and there are no preferences.

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, TBRA, and supportive services – eviction prevention that is 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.

Referrals will not be made through CE for non-congregate shelter.

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):

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, TBRA, and supportive services – eviction prevention projects. The VI tool will create tiers, as outlined below, reflecting preferences reflected in this plan. The CE unit will use data entered on qualifying populations into the CE project in HMIS to identify participants meeting the outlined priorities to then be assessed for HOME-ARP. To ensure fair and equitable access a prioritization list is developed specific to each service then utilized to refer qualifying populations to HOME-ARP projects and activities. All qualifying populations will be eligible for each activity funded by HOME-ARP. All participating providers will complete a training specific to data entry and assessing for eligible referrals.

Affordable Rental Housing Projects:

Affordable Rental Housing units supported by HOME-ARP funding will use the following prioritization method (as supported by the needs outlined earlier). This prioritization method will be reflected in the Vulnerability Index (VI) tool utilized for qualifying populations screened for affordable rental housing supported by HOME-ARP funding.

Tier 1: Youth from specific zip codes that are homeless or fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking

Tier 2: Any youth (non-zip code specific) experiencing homelessness or fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking

Tier 3: Persons experiencing homelessness or fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking from identified zip codes

Tier 4: Any person (non-zip code specific) experiencing homelessness or fleeing domestic violence, dating violence, sexual assault, stalking, or human trafficking.

Tenant Based Rental Assistance Projects:

TBRA funded through HOME-ARP will use the following prioritization method (as supported by the needs outlined earlier). This prioritization method will be reflected in the Vulnerability Index (VI) tool utilized for qualifying populations screened for affordable rental housing supported by HOME-ARP funding.

Tier 1: Households experiencing homelessness or fleeing domestic violence, dating violence, sexual assault, stalking or human trafficking with criminal justice involvement whose last known address is in specific zip codes.

Tier 2: Households experiencing homelessness or fleeing domestic violence, dating violence, sexual assault, stalking or human trafficking with criminal justice involvement and who have criminal justice involvement (not specific to certain zip codes).

Tier 3: Households experiencing homelessness and or fleeing domestic violence, dating violence, sexual

assault, stalking or human trafficking within specific zip codes.

Tier 4: Households experiencing homelessness or fleeing domestic violence, dating violence, sexual assault, stalking or human trafficking.

Support Services – Eviction Prevention:

Support Services will be accessed based on the urgency of households housing situation and prioritized under homelessness prevention.

Tier 1:

Tier 2:

Non-congregate shelter: N/A.

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):

N/A.

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.

Template

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 City of Albany does not intend to limit eligibility for a HOME-ARP rental housing or NCS 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:

N/A

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):

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***

N/A

- ***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.***

N/A

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

N/A

- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***

N/A

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

N/A

- ***Other requirements in the PJ's guidelines, if applicable:***

N/A