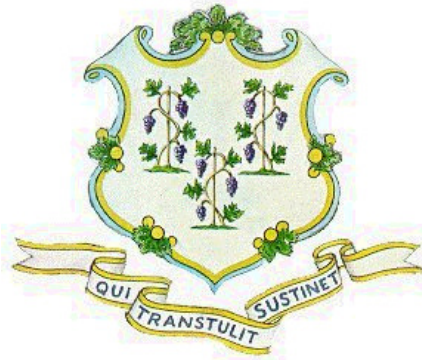




## **State of Connecticut**

# **HOME Investment Partnership Program – American Rescue Plan**

## **HOME – ARP Allocation Plan**



**May 3, 2022**

## State of Connecticut

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## I. EXECUTIVE SUMMARY

### A. Overview

State of Connecticut HOME Investment Partnerships Program – American Rescue Plan (“**HOME-ARP**”) funds are allocated to help communities provide housing, shelter, and services for the most vulnerable populations. HOME-ARP funds are in addition to the state’s regular FY 2021 HOME formula allocation.

The State of Connecticut’s HOME-ARP allocation is \$35,939,963.

HOME Investment Partnership Program – American Recovery Plan	
<u>FUNDING</u>	<u>HOME - ARP</u>
STATE OF CT	\$35,939,963

HOME-ARP funding allows for significant new resources to address homeless assistance needs by creating affordable housing for non-congregate shelter units and providing tenant-based rental assistance or supportive services. HOME-ARP funds are available for expenditure until September 2030.

HOME-ARP funds must be used for individuals or families from the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family’s homelessness or would serve those with the greatest risk of housing instability; and veterans and families that include a veteran family member that meet one of the preceding criteria.

HOME-ARP funds can be used for four eligible activities including the production or preservation of affordable housing; tenant-based rental assistance; supportive services, including homeless prevention services and housing counseling; and the purchase or development of non-congregate shelter for individuals and families experiencing homelessness. Additionally, HOME-ARP provides up to 15 percent of the allocation for administration and planning costs of the participating jurisdiction and for subrecipients administering all or a portion of the grant.

HOME-ARP can provide up to 5 percent of the grant for operating costs of Community Housing Development Organizations (CHDOs) and other non-profit organizations, including homeless providers. Additional funding is available to these organizations for capacity building.

## **B. Summary of Planned Activity**

The Department of Housing is prioritizing the creation of affordable housing opportunities for qualified populations, and creating non-congregate shelter opportunities. Other eligible activities may be considered, as opportunities arise.

Funding under the HOME – ARP program will be available in all 169 communities in accordance with program requirements and target population requirements. Proposals that include responsible growth, livability initiatives or community impact may be prioritized. Refer to **Section IX (D)(1)(d)** below for details.

DOH is **not** prioritizing one eligible qualifying population over another.

## **II. Consultation**

Before developing its HOME-ARP Allocation Plan, the Department of Housing (“**DOH**”) consulted with the Balance of State Continuum of Care and Opening Doors – Fairfield Continuum of Care, homeless and domestic violence service providers, veterans’ groups, public housing agencies (“**PHAs**”), public agencies that address the needs of the qualifying populations, and public/private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

As part of its Consultation Process, DOH conducted four (4) virtual round table discussions with the purpose of obtaining input into the development of the State of Connecticut HOME-ARP Allocation Plan. The purpose of the round table discussions was to consult with agencies and service providers whose clientele include the HOME-ARP qualifying populations to identify unmet needs and gaps in housing or service delivery systems.

Please see Attachment A-1 for organizations contacted, Attachment A-2 for meeting notes, and Attachment B-1 for the Consultation invites for each of the following meetings:

- The round table discussion for the Continuum of Care Partners took place on Monday, October 18, 2021 at 10:00 AM. DOH met with the Balance of State Continuum of Care and Open Doors – Fairfield Continuum of Care;
- The round table discussion for Housing Authorities took place on Monday, October 18, 2021 at 1:00 PM;
- The round table discussion for the Community Partners took place on Tuesday, October 19, 2021 at 10:00 AM; and
- The round table discussion for our State Agency Partners took place on Thursday, October 21, 2021 at 11:00 AM.

DOH took written comment by e-mail until Midnight on October 29, 2021. We received significant comment and data with regard to eligible activities, population preferences, and target geographies. All of this feedback and input was considered in the drafting of this allocation plan.

### **III. Public Participation**

In accordance with Connecticut's Amended Citizen Participation Plan (See Attachment A-3) and in an effort to give reasonable notice and an opportunity to comment, DOH will solicit public input in order to: 1) solicit input into the development of the draft State of Connecticut HOME-ARP Allocation Plan (Consultation Process); and 2) solicit feedback and comments on the draft State of Connecticut HOME-ARP Allocation Plan (Public Participation).

DOH solicited input on the draft State of Connecticut HOME-ARP Allocation Plan through a fifteen (15) day public comment period from January 20, 2022 thru February 4, 2022. DOH held a virtual public hearing on the draft State of Connecticut HOME-ARP Allocation Plan on Thursday, February 3, 2022. A legal notice was published in four newspapers across the state including one in Spanish announcing the public hearing and comment period. (See Attachment B-1). The legal notice and related documents are available on DOH's website. As part of the notice, DOH included information on how citizens who have special

needs may obtain the allocation plan in a form which is accessible to them. Housing authorities, municipalities, non-profits, advocates, and the general public were invited to attend this public meeting and provide input/comment on the Draft State of Connecticut HOME Investment Partnerships Program-American Rescue Plan ("HOME\_ARP") Allocation Plan.

**Outline of Activity for Public Hearing/Public Comment:**

All comments received both at the public hearings and in writing are summarized and responded to in Attachment A-4. Please see Attachment B-2 for the link to the Virtual Public Hearing Recording and Attachment B-3 for Written Comments.

#### IV. Needs Assessment and Gaps Analysis

DOH evaluated the size and demographic composition of qualifying populations within its boundaries and assessed the unmet needs of those populations. Additionally, DOH identified gaps within the state's current shelter and housing inventory as well as the service delivery system. The most current data available was utilized including the point in time count and the housing inventory count for quantifying the individuals and families in the qualifying populations and their need for additional housing, shelter or services (if we use other data list here). The following qualifying populations and the size and demographic composition of these qualifying populations within the state's boundaries are:

- ***Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a)) –***

*For purposes of this chapter, the terms "homeless", "homeless individual", and "homeless person" means-<sup>1</sup>*

- (1) an individual or family who lacks a fixed, regular, and adequate nighttime residence;*
- (2) an individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;*
- (3) an individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations, congregate shelters, and transitional housing);*
- (4) an individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided;*
- (5) an individual or family who-*
  - (A) will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations, as evidenced by-*
    - (i) a court order resulting from an eviction action that notifies the individual or family that they must leave within 14 days;*
    - (ii) the individual or family having a primary nighttime residence that is a room in a hotel or motel and where they lack the resources necessary to reside there for more than 14 days; or*
    - (iii) credible evidence indicating that the owner or renter of the housing will not allow the individual or family to stay for more than 14 days, and any oral statement from an individual or family seeking homeless assistance that is found to be credible shall be considered credible evidence for purposes of this clause;*
  - (B) has no subsequent residence identified; and*
  - (C) lacks the resources or support networks needed to obtain other permanent housing; and*
- (6) unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statutes who-*
  - (A) have experienced a long term period without living independently in permanent housing,*
  - (B) have experienced persistent instability as measured by frequent moves over such period, and*

*(C) can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse, the presence of a child or youth with a disability, or multiple barriers to employment.*

Data from August 2021 HMIS Reporting Repository indicates that there were a total number of 218 persons served thru the state's emergency shelter program: 135 Adults and 83 Children; 85 Males and 50 Females; 1 Veterans; 44 Chronically Homeless Persons; 15 Youth Under Age 25; 6 Parenting Youth Under Age 25.

Of the 218 persons, it was reported that there were 73 White; 97 Black-African American-African; 0 Asian-Asian American; 4 American Indian-Alaska Native-Indigenous; 0 Native Hawaiian-Pacific Islander; 20 Multiple Races; 0 Doesn't Know; and 24 Data Not Collected. There were 121 Non-Hispanic/Non-Latin and 86 Hispanic/Latin; with no data collected for 11 Individuals.

The following represent physical and mental health conditions of the 218 persons reported upon entry into the shelter system: 69 Mental Health Disorder; 19 Alcohol Use Disorder; 10 Drug Use Disorder; 8 Both Alcohol and Drug Use Disorders; 29 Chronic Health Condition; 2 HIV/AIDs; 27 Developmental Disabilities; and 32 persons had Physical Disabilities. 24 individuals had a history of Domestic Violence; 2 individuals reported that they were fleeing Domestic Violence.

The living situation of these 218 individuals was reported as follows: 82 Emergency Shelter; 34 Place Not Meant for Habitation; 2 Safe Haven; 1 Hospital or Other Residential Medical Facility; 1 Jail, Prison or Juvenile Detention Facility; 1 Rented by Client with No Subsidy; 1 Rented by Client with Other Subsidy; 1 Hotel without Voucher; 6 Staying or Living in a Friend's Room, Apartment or House; 3 Staying or Living in a Family Member's Room, Apartment or House; 3 Persons for which Data Not Collected.

Cash income for these folks (adults) was reported as: 77 persons for no income; 3 for \$1-\$150; 3 for \$151-\$250; 10 for \$251-\$500; 26 for \$501-\$1000; 2 for \$1,001-\$1,500; 9 for \$1,501-\$2,000; and 2 for \$2,001 +; 2 Client Doesn't Know; and 3 persons Data Not Collected.



Additionally, out of the 218 persons that entered the shelter system the length of participation included: 28 persons for 0-7 days; 15 persons for 8-14 days; 14 persons for 15-21 days, 15 persons for 22-30 days; 49 persons for 31-60 days; 40 persons for 61-90 days; 49 persons for 91-180 days; and 8 persons for 181-365 days.

- ***At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C.11360(1)) -***

*The term "at risk of homelessness" means, with respect to an individual or family, that the individual or family-*

*(A) has income below 30 percent of median income for the geographic area;*

*(B) has insufficient resources immediately available to attain housing stability; and*

*(C) (i) has moved frequently because of economic reasons;*

*(ii) is living in the home of another because of economic hardship;*

*(iii) has been notified that their right to occupy their current housing or living situation will be terminated;*

*(iv) lives in a hotel or motel;*

*(v) lives in severely overcrowded housing;*

*(vi) is exiting an institution; or*

*(vii) otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.*

*Such term includes all families with children and youth defined as homeless under other Federal statutes.*

Data from August 2021 HMIS Reporting Repository indicates that there were a total number of 704 persons served thru the state's rapid rehousing program: 417 Adults and 286 Children; 295 Males and 408 Females; 7 Veterans; 77 Chronically Homeless Persons; 28 Youth Under Age 25; 16 Parenting Youth Under Age 25; 84 Heads of Households and Adult Stayers in the Project 365 Days or More.

Of the 704 persons, it was reported that there were 265 White; 379 Black-African American-African; 1 Asian-Asian American; 4 American Indian-Alaska Native-Indigenous; 2 Native Hawaiian-Pacific Islander; 26 Multiple Races; 4 Doesn't Know; and 23 Data Not Collected. There were 488 Non-Hispanic/Non-Latin and 204 Hispanic/Latin; with no data collected for 12 Individuals.

The following represent physical and mental health conditions of the 704 persons reported upon entry into the system: 214 Mental Health Disorder; 16 Alcohol Use Disorder; 41 Drug Use Disorder; 17 Both Alcohol and Drug Use Disorders; 124 Chronic Health Condition; 3 HIV/AIDs; 78 Developmental Disabilities; and 77 persons had

Physical Disabilities. 112 individuals had a history of Domestic Violence; 30 individuals reported that they were fleeing Domestic Violence.

The living situation of these 704 individuals was reported as follows: 291 Emergency Shelter; 1 Transitional Housing; 38 Place Not Meant for Habitation; 3 Safe Haven; 1 Jail, Prison or Juvenile Detention Facility, 1 Half-Way House; 1 Permanent Housing (other than RRH) for Formerly Homeless; 1 Owned by Client with On-Going Housing Subsidy; 31 Rented by Client with RRH; 4 Rented by Client with No Subsidy; 3 Rented by Client with Other Subsidy; 2 Hotel without Voucher; 8 Staying or Living in a Friend's Room, Apartment or House; 29 Persons for which Data Not Collected.

Cash income for these folks (adults) was reported as: 122 persons for no income; 3 for \$1-\$150; 17 for \$151-\$250; 45 for \$251-\$500; 94 for \$501-\$1000; 41 for \$1,001-\$1,500; 36 for \$1,501-\$2,000; and 16 for \$2,001 +; 2 Client Doesn't Know; and 41 persons Data Not Collected.

Additionally, 201 persons had a stay of between 181 days and 365 days; and 214 persons participated between 366 days to 730 days. Majority of other persons spread out for fewer days with many between one to three months.

- ***Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary***

An Analysis of Service Utilization and Perceptions from the Field – a Report to the Connecticut Coalition Against Domestic violence (CCADV); Lucy Brakonietcki, Amy Muslim and Nicole Seymour – Connecticut Women's Education and Legal Fund; February 2015 – This study conducted for Connecticut Coalition Against Domestic Violence (CCADV) by staff at the Connecticut Women's Education and Legal Fund (CWEALF) examined data related to shelter and service provision offered through the 18 Connecticut CDAV-funded domestic violence agencies in Connecticut. Executive Directors identified long-term housing as one of the greatest issues they face. Insufficient long-term housing options for clients means that agencies are compelled to keep clients in their emergency shelters as they wait for more appropriate placements. Shelter Managers suggested that the lack of affordable housing, trauma, and

immigration may be contributing to shelters being, and staying, at or over capacity. Shelters are also seeing greater numbers of complex clients, often with multiple challenges: young mothers with children, youth aging out of DCF, women with mental health and or substance use issues, and immigrant women. The issue of employment for clients is also an issue because it limits a client's ability to leave an abuser and be self- and family-sustaining. Other challenges include providing culturally and linguistically competent services. Service providers and community collaborators both indicated that the lack of sufficient mental health services for clients and a lack of training for non-clinical practitioners across the state is a challenge to providing the growing number of clients with mental health issues with quality care. There also exists a need for family law attorneys available to victims without resources.

In 2021, the Connecticut Coalition Against Domestic Violence reported 38,989 victims. 32,225 victims received court-based advocacy; this includes assistance with both criminal and civil matters. There were 41,654 incoming calls/contacts received by member organizations requesting services and information. 32,395 victims received one-on-one counseling or participated in support groups. This includes safety planning, assistance obtaining basic needs, etc. The most requested services included: housing concerns/needs; intervention with/employer, creditor, landlord, school; and childcare assistance and coordination of services. The pandemic has both increased complexity of victim needs and created additional barriers to access services. Member organizations have stretched continuously dwindling resources to meet the increased complexity of needs. The pandemic has also severely impacted efforts to reach more underserved communities.

In 2021, domestic violence housing services housed 2,950 victims and children in one of four housing programs. This is a 6% increase from the previous year, including an 11% increase in use of emergency shelter. Shelters served 1,370 Adults and 1,045 children. Other housing (transitional, supportive, and rapid rehousing) included 224 adults and 311 children. The average child age across housing programs was 6.4 years old. The shelter utilization rate was 156%, which means that shelters ran over capacity through the year. This is a 30% increase from the previous year. The pandemic has resulted in skyrocketing shelter needs while simultaneously limiting space available in shelter due to public health and spacing guidelines. This meant using

hotels to shelter individuals which drastically increased costs for our members. Beyond the cost of the room, hoteling adds costs such as: providing 3 meals a day, paying for Wi-Fi, providing laptops or tablets to children so that they can participate in remote learning, increased staff time to manage hoteling and travel to provide case management on site, deliver meals and basic necessities, etc.

- ***In other populations where providing supportive services or assistance under section 212(a) of the Act (42 U.S.C.12742(a)) would prevent the family's homelessness or would serve those with the greatest risk of housing instability including Veterans and families that include a Veteran family member that meet one of the preceding criteria.***

According to the recent study, *Connecticut Housing Assessment Current and Future Trends in Affordable and Accessible Housing Supply and Needs* (the Study), December 2020, conducted by Fairfield County Center for Housing Opportunity, Urban Institute, Corporation for Supportive Housing, and Datahaven, in addition to a steady decline in population, the state's population is also aging. The number of adults ages 60-74 has increased by more than 50% since 2000, while populations under 19 years and between 35 and 59 years have declined. By 2040 it is projected the state's oldest residents will grow by over 68,000 persons. Connecticut has also seen stable shares of population reporting disabilities of various types, with the most commonly reported disability being cognitive or ambulatory disabilities. According to the American Community Survey, there are 302,446 households (or 22 percent of total households) living in Connecticut that have at least one member with a disability. Generally, a larger percentage of low- and very low- income households reported at least one member with a disability than households with higher incomes.

Included in this population are the 38% of households in the state who live in poverty or who are ALICE – Asset Limited, Income Constrained, Employed. Connecticut United Way put out its 2020 Connecticut report entitled, “ALICE in Connecticut: A Financial Hardship Study.” This study comprises households that earn more than the Federal Poverty Level but less than the basic cost of living for the state (the ALICE Threshold). ALICE households earn too much to qualify as “poor” but are still unable to make ends meet. They often work as cashiers, nursing assistants, office clerks, servers, laborers,

and security guard. These types of jobs are vital to keeping Connecticut's economy running smoothly, but they do not provide adequate wages to cover the basics of housing, child care, food, transportation, health care, and technology for these ALICE workers and their families. Out of Connecticut's 1,378,091 households, 146,552 earned below the Federal poverty Level (11 %) in 2018 and another 367,175 (27% were ALICE).

A 2018 overview of the labor status of Connecticut's 2,926,327 working-age adults (people age 16 and over) shows that 67% of adults were in the labor force, yet more than half were workers who were paid hourly. Hourly paid jobs tend to have lower wages, fewer benefits, and less stability. In addition, 34% of adults were outside the labor force, either because they were retired or because they had stopped looking for work.

ALICE households live in every county in Connecticut; they include people of all genders, ages, and races/ethnicities, across all household types, living in urban, suburban, and rural areas. The largest numbers of households below the ALICE Threshold were in the largest demographic groups in Connecticut – households headed by someone in their prime working years (ages 25-64), White households, and single or cohabitating households (without children or seniors). Among families with children, married-parent families were the largest subgroup and accounted for 35 % of families with children living below the ALICE Threshold.

The State of Connecticut's UniteCT Program, funded through the American Recovery Act, is administered by the Department of Housing on behalf of the US Treasury. UniteCT provides up to \$15,000 rental and electricity payment assistance on behalf of Connecticut households financially impacted by the COVID-19 pandemic. UniteCT is stabilizing CT's rental housing market by financially supporting those households up to 80% of HUD's Area Median Income (AMI). The program was also able to capture data and found that 75.21% of cases were below 31% AMI. Roughly 62,500 cases reported having a financial hardship and housing instability.

## Description of the unmet housing and service needs of qualifying populations:

### Sheltered and unsheltered homeless populations - Need

#### Point in Time Count 2020:

Summary of Persons in Each Household Type	Sheltered			
	Emergency Shelter	Transitional Housing	Unsheltered	Total
<b>Persons in households without children</b>	1,352	280	316	1,948
<i>Persons age 18 to 24</i>	58	56	21	135
<i>Persons Over Age 24</i>	1,294	224	295	1,813
<b>Persons in households with at least one adult &amp; one child</b>	776	154	2	932
<i>Children under age 18</i>	471	88	1	560
<i>Persons age 18 to 24</i>	38	34	1	73
<i>Persons Over Age 24</i>	267	32	0	299
<b>Persons in households with only children</b>	13	5	7	25
<b>Total</b>	<b>2,141</b>	<b>439</b>	<b>325</b>	<b>2,905</b>

*HUD 2020 Continuum of Care Homeless Assistance Programs Homeless populations and Subpopulations – Point in Time 2020 Count*

Demographic Summary by Race	Sheltered			
	Emergency Shelter	Transitional Housing	Unsheltered	Total
<b>Black or African American</b>	807	162	96	1,065
<b>White</b>	1,067	245	207	1,519
<b>Asian</b>	14	1	1	16
<b>American Indian or Alaska Native</b>	27	5	2	34
<b>Native Hawaiian or other pacific Islander</b>	10	0	0	10
<b>Multiple Races</b>	216	26	19	261
<b>Total</b>	<b>2,141</b>	<b>439</b>	<b>325</b>	<b>2,905</b>

*HUD 2020 Continuum of Care Homeless Assistance Programs Homeless populations and Subpopulations – Point in Time 2020 Count*

Demographic Summary by Ethnicity	Sheltered		Unsheltered	Total
	Emergency Shelter	Transitional Housing		
Hispanic/Latino	669	117	61	847
Non-Hispanic/Non-Latino	1,472	322	264	2,058
Total	2,141	439	325	2,905

*HUD 2020 Continuum of Care Homeless Assistance Programs Homeless populations and Subpopulations – Point in Time 2020 Count*

Demographic Summary by Gender	Sheltered		Unsheltered	Total
	Emergency Shelter	Transitional Housing		
Female	862	171	74	1,107
Male	1,271	266	248	1,785
Transgender	4	2	0	6
Gender Non-conforming	4	0	3	7
Total	2,141	439	325	2,905

*HUD 2020 Continuum of Care Homeless Assistance Programs Homeless populations and Subpopulations – Point in Time 2020 Count*

Summary of Chronically Homeless Persons in Each Household Type	Sheltered		Unsheltered	Total
	Emergency Shelter	Transitional Housing		
Chronically Homeless persons in households without children	115	0	50	165
Chronically Homeless persons in households with at least one adult and one child	6	0	0	6
Chronically Homeless persons in households with only children	6	0	0	6
Total	127	0	50	177

*HUD 2020 Continuum of Care Homeless Assistance Programs Homeless populations and Subpopulations – Point in Time 2020 Count*

Summary of all Other Populations Reported	Sheltered		Unsheltered	Total
	Emergency Shelter	Transitional Housing		
Severely Mentally Ill	227	58	61	346
Chronic Substance Abuse	94	25	47	166
Veterans	48	139	12	199
HIV/AIDs	21	22	3	46
Victims of Domestic Violence	444	80	23	547
Unaccompanied Youth	65	55	28	148
Unaccompanied Youth Under 18	9	0	7	16
Unaccompanied Youth 18-24	56	55	21	132
Children of Parenting Youth	15	28	1	44
Parenting Youth under 18	2	1	0	3
Parenting Youth 18-24	13	27	1	41
Children of Parenting Youth	19	28	1	48

***HUD 2020 Continuum of Care Homeless Assistance Programs Homeless populations and Subpopulations – Point in Time 2020 Count***

According to the Connecticut Coalition to End Homelessness (“**CCEH**”), initial data from the January 26, 2021 Point in Time (“**PIT**”) count shows that the overall homeless population has dropped 10.7% to 2,594. This year’s unsheltered PIT count does reflect a 32% increase in this population. The unsheltered population cannot be compared to previous year’s results due to a different methodology utilized for safety concerns over COVID-19. This year data in the Homeless Management Information system (“**HMIS**”) was utilized. The unsheltered data is managed by professional outreach teams who are familiar with this population and engage with them year-round. The method employed this year provided accurate data on demographics, disabling conditions, and chronic homelessness since it is entered and verified by outreach staff throughout the year.



### Point in Time Count 2021:

Demographic Summary by Race	Sheltered			Unsheltered	Total
	Emergency Shelter	Transitional Housing	Safe Haven		
Black or African American	730	95	2	167	994
White	844	183	7	234	1,268
Asian	14	0	0	3	17
American Indian or Alaska Native	27	3	0	3	33
Native Hawaiian or other pacific Islander	8	3	0	3	14
Multiple Races	222	27	0	19	268
Total	1,845	311	9	429	2,594

*Connecticut Coalition to End Homelessness PIT Dashboard January 2021*

Demographic Summary by Ethnicity	Sheltered			Unsheltered	Total
	Emergency Shelter	Transitional Housing	Safe Haven		
Hispanic/Latino	523	94	0	83	700
Non-Hispanic/Non-Latino	1,322	217	9	346	1,894
Total	1,845	311	9	429	2,594

*Connecticut Coalition to End Homelessness PIT Dashboard January 2021*

Summary of Persons in Each Household Type	Sheltered			Unsheltered	Total
	Emergency Shelter	Transitional Housing	Safe Haven		
Persons in households without children	1,310	178	9	429	1,926
Persons in households with at least one adult and one child	528	133	0	0	661
Persons in households with only children	1	0	0	0	1

*Connecticut Coalition to End Homelessness PIT Dashboard January 2021*

Summary of Chronically Homeless Persons in Each Household Type	Sheltered			
	Emergency Shelter	Transitional Housing	Safe Haven	Unsheltered
Chronically Homeless All Adults	400	0	1	65
Chronically Homeless Single Adults	291	0	1	0
Chronically Homeless Adults in Families	41	0	0	0

*Connecticut Coalition to End Homelessness PIT Dashboard January 2021*

Summary of all Other Populations Reported	Sheltered				
	Emergency Shelter	Transitional Housing	Safe Haven	Unsheltered	Total
Severely Mentally Ill	211	43	2	98	354
Chronic Substance Abuse	98	24	3	53	178
Veterans	30	75	9	14	128
HIV/AIDs	22	12	0	7	41
Victims of Domestic Violence	409	93	0	22	524
Unaccompanied Youth	397	145	0	29	571
Unaccompanied Youth Under 18	309	76	0	0	385
Unaccompanied Youth 18-24	88	69	0	29	186

*Connecticut Coalition to End Homelessness PIT Dashboard January 2021*

## Those currently housed populations at risk of homelessness - Need

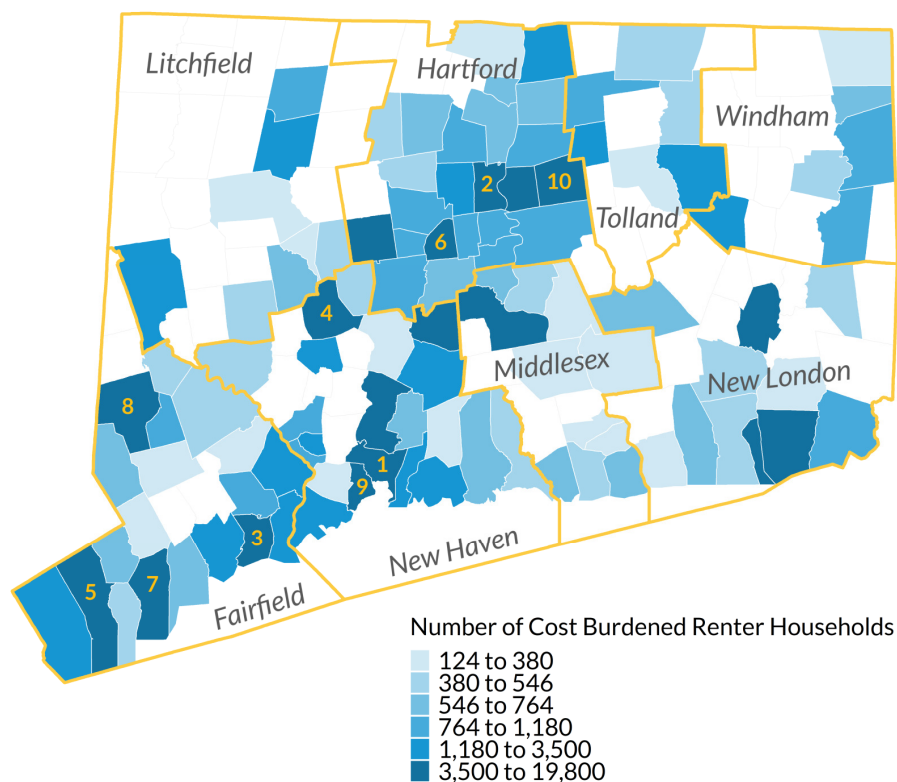
According to the recent study, *Connect Housing Assessment Current and Future Trends in Affordable and Accessible Housing Supply and Needs* (the Study), December 2020, conducted by Fairfield County Center for Housing Opportunity, Urban Institute, Corporation for Supportive Housing, and Datahaven, incomes among renters have stayed steady even as rental costs have risen by at least 10 percent and by more in areas where the rental stock remained constrained. Because of this, Connecticut's renter population faces

*2021-22 Action Plan for Housing and Community Development  
Connecticut Department of Housing*

significantly higher and rising rates of cost burdens than homeowners, and housing investments that support the economic wellbeing of renters may have higher marginal societal returns than those intended for homeowners.

The study compared the numbers of households (need) and housing units (supply) at respective income and cost bands indicates where there are gaps in affordable housing supply. Currently there are 86,068 more very low-income households than housing units affordable to such households. No county in Connecticut has a sufficient supply of affordable housing units to meet the needs of their very low-income households. And although the total number of very-low income households will decline through 2040, the decrease will not be enough to close the current gap.

The Study further indicates the population of cost burdened renters is particularly high in fast-growing markets such as those in Fairfield and New Haven Counties (figure 35, page 6, *Connecticut Housing Assessment Current and Future Trends in Affordable and Accessible Housing Supply and Needs*, December 2020, Fairfield County Center for Housing Opportunity, Urban Institute, Corporation for Supportive Housing, and Datahaven). While the number of cost burdened renters is highest in central cities, the share of cost burdened renters is particularly high in smaller towns (with the exception of Bridgeport), especially suburbs of larger cities. These data indicate that assisted housing is most needed in those central cities with high cost burdened populations, but also that regional coordination between large cities and their outlying suburbs may be necessary to ensure adequate production of rental housing to reduce the share of renters commuting into those central cities who are cost burdened.



**Figure 35**

**Source:** ACS 2014-2018 data.

**Note:** Map shows towns with at least 400 renters. Top ten ranked townships are: 1) New Haven City, 2) Hartford City, 3) Bridgeport, 4) Waterbury, 5) Stamford, 6) New Britain, 7) Norwalk, 8) Danbury, 9) West Haven, and 10) Manchester.

### **Other families requiring services or housing assistance or to prevent homelessness, including the elderly and the disabled - Need**

The Study recommends focusing specifically on aging populations and the need for greater assisted accessible housing across the state but especially in town with high Black, indigenous, or persons of color (BIPoC) populations and especially in some of the state's more rural counties.

As Figure 35 showed, the largest need for assisted accessible housing units is concentrated in the state's urban counties: Fairfield, Hartford, and New Haven Counties. However, the share of very-low-income households with a member who has a disability is actually highest in Windham and New London Counties, indicating that a greater share of

assisted housing in those counties needs to be made accessible for populations with disabilities.

**Number and Share of Households with a Member with a Disability by Income Band and County**

Income Category*	Number/Share of HHs within Income Band**	Connecticut	Fairfield	Hartford	Litchfield	Middlesex	New Haven	New London	Tolland	Windham
VLI	Number	76,498	19,392	21,676	3,147	3,670	17,337	6,077	2,533	2,666
	Share	38%	35%	41%	36%	39%	37%	42%	33%	46%
LI	Number	46,206	10,227	11,881	2,930	2,514	11,596	3,430	1,762	1,866
	Share	31%	27%	32%	34%	33%	31%	32%	26%	41%
MLI	Number	50,444	11,031	13,600	2,983	2,206	12,044	4,480	2,104	1,996
	Share	24%	22%	24%	25%	21%	23%	25%	26%	29%
MHI	Number	45,211	9,117	11,229	2,530	2,345	10,538	4,979	2,281	2,192
	Share	20%	17%	19%	17%	19%	20%	24%	22%	24%
HI	Number	84,087	18,072	22,105	4,415	3,572	21,438	7,957	2,959	3,569
	Share	15%	13%	15%	15%	13%	15%	18%	13%	20%

**Table 26**

**Source:** IPUMs ACS 2014-2018 data

**Note:** \*VLI = Very-Low-Income; LI = Low-Income; MLI = Mid-High -Income; HI = High-Income

\*\*Share represents the percentage of all households within that income band that have a least one member with a disability

More detailed data on the distribution of very-low-income households with at least one member with a disability offers even clearer directing for targeting the state's assisted accessible housing resources (figure 36, page 9, *Connecticut Housing Assessment Current and Future Trends in Affordable and Accessible Housing Supply and Needs*, December 2020, Fairfield County Center for Housing Opportunity, Urban Institute, Corporation for Supportive Housing, and Datahaven). The Study indicates that Connecticut would best meet the most pressing accessible housing needs of very-low-income households by targeting assistance to and further exploring the town-by-town needs within:

- Northern Hartford County, which include East Granby, Enfield, Hartland, Simsbury, Windsor, Windsor Locks, Canton, East Windsor, Suffield, Granby Bloomfield, Ellington, Somers, Colebrook, and Barkhamsted towns.
- West Haven, Milford, and Orange towns
- Northern New London County, which include Lisbon, Bozrah, Franklin, Griswold, Norwich, Preston, Scotland, Canterbury, Plainfield, Sterling, Sprague, Voluntown towns
- Windham County
- Bristol, Southington, and Burlington towns

All of these groups of towns have high prevalence of disabilities among their very-low-income households. At least 44 percent of the very-low-income households within these PUMAs have a member with a disability. Considering that these areas aggregate town-level data, it is highly likely that the concentration of very-low-income households with disabilities is even higher in some towns and lower in others within these town groups.

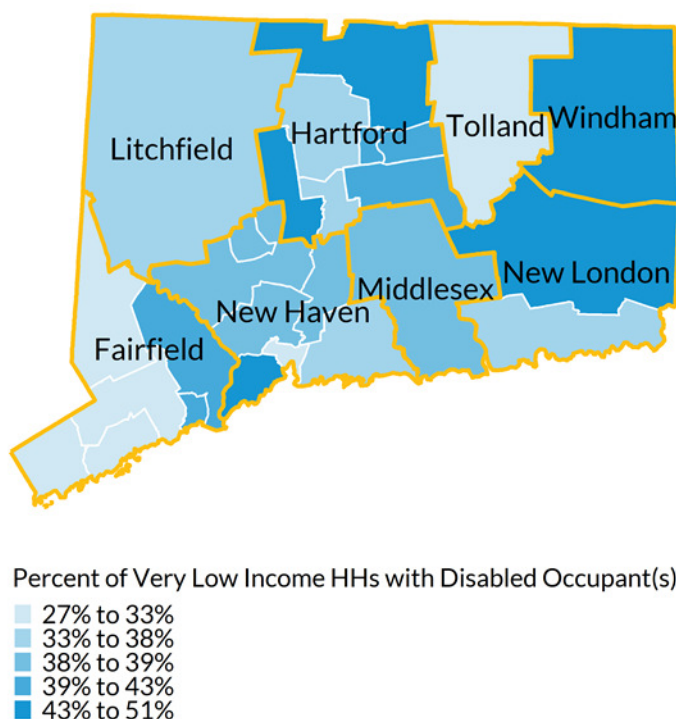


Figure 36

Source: ACS 2014-2018 data

Lastly, the Study notes that in addition to Connecticut's current distribution of populations with disabilities, the population will age significantly even as it decreases, which means that there will be less demand for new assisted housing units than demand for modifications of existing housing to ensure accessibility for aging residents. At the same time though, projections also show a growing share of Connecticut's population will be childless and single or divorced with lower incomes following retirement, which also increases the need for smaller assisted accessible housing units. By 2030 the state is projected to have 27,600 more households with either mobility or sensory needs; by 2040 that number will grow to over 44,000. The need for accessible housing will grow in all counties, with the largest increases in Fairfield, New Haven and Hartford counties.

Consequently, we will need a strategy that targets a broad spectrum of affordable housing and supportive housing towards the PUMAs identified above to respond to the pressing need for assisted accessible housing in the present, but also prepares for assisted accessibility modifications and housing production for rural, aging counties where residents will need independent living and self-care assistance and/or facilities.

### **Individuals and families experiencing domestic violence - Need**

In 2021, domestic violence housing services housed 2,950 victims and children in one of four housing programs. This is a 6% increase from the previous year, including an 11% increase in use of emergency shelter. Shelters served 1,370 Adults and 1,045 children. Other housing (transitional, supportive, and rapid rehousing) included 224 adults and 311 children. The average child age across housing programs was 6.4 years old. The shelter utilization rate was 156%, which means that shelters ran over capacity through the year. This is a 30% increase from the previous year. The pandemic has resulted in skyrocketing shelter needs while simultaneously limiting space available in shelter due to public health and spacing guidelines. This meant using hotels to shelter individuals which drastically increased costs for our members. Beyond the cost of the room, hoteling adds costs such as: providing 3 meals a day, paying for Wi-Fi, providing laptops or tablets to children so that they can participate in remote learning, increased staff time to manage hoteling and travel to provide case management on site, deliver meals and basic necessities, etc.

**Current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:**

The state DOH offers a significant amount of resources through a wide variety of programs to offer housing assistance to qualifying populations.

**Programs/initiatives that create or preserve affordable housing units.** This resource supports all of the qualifying populations including homeless, at-risk of homelessness, domestic violence victims and other populations where support would prevent homelessness.

Development Engagement Process	\$110MM annually
(Affordable Housing Program/State Housing Trust Fund)	

**Coordinated Access Network Programs and Supportive Services.** This resource supports all of the qualifying populations including homeless, at-risk of homelessness, domestic violence victims and other populations where support would prevent homelessness.

ESG Funding	\$ 2.2 MM annually
Housing/Homeless Services	\$ 19 MM annually

**Tenant-based Rental Assistance Programs** Assisted housing is any housing that receives government support or is regulated to bridge the gap between housing costs and household incomes. The most prevalent forms of housing assistance in Connecticut are federal housing choice vouchers and Section 8 project-based rental assistance. This resource supports all of the qualifying populations including homeless, at-risk of homelessness, domestic violence victims and other populations where support would prevent homelessness.

State Rental Assistance Payments program	\$ 62 MM annually
Various federal Section 8 Programs	



Homeless Set-aside/Main Stream/

Disability Vouchers/Foster Youth Independence

\$ 80 MM annually

### **Other Related Initiatives**

The Study also examined housing accompanied by a service component (supportive housing) that allows households living with a cognitive, independent living, or self-care disability to thrive in independent living situations. Units in this category include the state Rental Assistance Payments program for special populations, DMHAS Supportive housing Program, LIHTC and HTCC Supportive Housing Set-asides, the Section 811 PRA program, and federal Veterans Affairs Supportive Housing vouchers. Through administrative data sources, the study team identified 3,140 supportive housing units across these programs for individual and 588 for families.

### **Gaps within the current shelter and housing inventory as well as the service delivery system (shelter beds, housing inventory, service delivery):**

The CT Point-in-Time Count 2021, conducted through the Connecticut Coalition to End Homelessness, showed a decline in both the sheltered individual and family populations yet showed an increase in the unsheltered individual population. The 2021 unsheltered PIT count reflected a 32% increase in this population. The unsheltered population cannot be compared to previous years' results because a different methodology was utilized due to safety concerns over COVID-19. The 2021 count used data in the Homeless Management Information System (HMIS). The unsheltered data is managed by professional outreach teams who are familiar with this population and engage with them year-round. The method employed this year provided accurate data on demographics, disabling conditions, and chronic homelessness since it is entered and verified by outreach staff throughout the year. Given the restrictions in the HUD reporting requirements for the unsheltered, it is likely that these numbers are often under-representations of this population in the PIT.

Comparing the numbers of households (need) and housing units (supply) at respective income and cost bands indicates where there are gaps in affordable housing supply. According to the Study, there are currently 86,068 more very-low-income households than

housing units affordable to such households. No county in Connecticut has a sufficient supply of affordable housing units to meet the needs of their very low-income households, with the largest gaps in Fairfield, Hartford, and New Haven Counties. Also, the decline in very-low-income households through 2040 will not be enough to close the current gap.

According to the ACS, there are 302,446 households (or 22 percent of total households) living in Connecticut that have at least one member with a disability. Generally, a larger percentage of low-and very-low-income households reported at least one member with a disability than households with higher incomes. Roughly one third of assisted housing in Connecticut needs to be designed for residents who have a disability, especially those with physical, ambulatory, and cognitive disabilities. Across the state, renter households with a member with a disability were more likely to be cost burdened, compared to renter households without a member with a disability.

The study showed that the need for Housing with Services (supportive housing) was identified using the following characteristic: having two or more active conditions (health/mental health/behavioral health) or one condition that rises to the level of a disability, monthly income of less than \$750, and at least one episode of previous homelessness in the past three years. The current supply of supportive housing is insufficient to meet current needs.

It is estimated that an additional 400 shelter beds need to be available on a regular basis. Add to this the anticipated increase in temporary homelessness caused by the continuing effects of the pandemic, and it is reasonable to estimate that 600 permanent shelter beds should be created.

### **Identification of priority needs for qualifying populations:**

In order to effectuate long-term change, DOH intends to prioritize the creation and/or substantial rehabilitation of new affordable housing units, as well as the purchase or development of non-congregate shelter for individuals and families experiencing homelessness. However, all eligible activities, including supportive services in a HOME-ARP funded project, and TBRA in a HOME-ARP funded project, will be considered.

The Department does not intend to prioritize any qualifying population as part of its funding decision process. Individual projects may prioritize one qualifying population over another, however, this prioritization shall not impact the funding decisions associated with the use of these funds.

Projects which choose to prioritize the homeless population will be required to do so using the CANs, however, referrals for other qualified populations may come through other appropriate referral systems, as appropriate, including but not limited to:

1. Conventional application and wait list management,
2. Referrals from state and local veteran's organizations,
3. Referrals from state and local domestic violence agencies,
4. Referrals from state and local advocacy groups for the disabled.

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

A recently commissioned study, *Connecticut Housing Assessment Current and Future Trends in Affordable and Accessible Housing Supply and Needs*, December 2020, Fairfield County Center for Housing Opportunity, Urban Institute, Corporation for Supportive Housing, and Datahaven, offered county specific population and demographic trends and analyzed those trends against the backdrop of each county's current affordable and accessible housing inventory. This data and analysis offers an opportunity for Connecticut to develop an affordable and accessible housing strategy by prioritizing state funding of assisted units based on the identified housing needs of its most cost burdened populations first.

Additionally, the CT Point-in-Time Count 2021, conducted through the Connecticut Coalition to End Homelessness (CCEH), showed a 32% increase in the Connecticut's unsheltered population. The unsheltered population cannot be compared to previous years' results as a different methodology due to safety concerns over COVID-19. In previous years, the unsheltered count involved volunteers canvassing pre-identified areas and conducting surveys of those who were unsheltered on the night of PIT. This year, CCEH and both of the state's Continuums of Care (CoCs) opted to pilot a HUD-approved data-driven

approach that leveraged our year-around outreach staff to provide updates on the unsheltered homeless using records in our statewide database, the Homeless Management Information System (HMIS). This year's count reflects actual numbers from our HMIS and did not include any statistical sampling of areas to account for the high-probability or low-probability of finding homeless individuals in certain geographic regions. CCEH believes this is a more accurate method of counting this population. The final numbers include extrapolation for missing demographic data, including race, ethnicity, and gender, which aligns with HUD standards.

The outreach workers verified who was unsheltered on the night of the PIT in the two weeks following the count. Anyone who slept in a shelter, or COVID-funded hotel or motel on the night of the count, was not included in the unsheltered count and was included in the sheltered count. CCEH collaborated with regional coordinators to verify the unsheltered counts and worked with the Veterans Administration (VA) to confirm the veteran counts.

## **V. HOME – ARP Activities**

### **A. Resources**

Federal and state resources are being distributed to help communities provide housing, shelter, and services for the most vulnerable populations. This State of Connecticut 2021-2022 Action Plan – First Amendment – HOME Investment Partnership Program – American Rescue Plan for Housing and Community Development outlines the additional HOME – ARP funding the State of Connecticut will receive for the HOME Investment Partnership Program. Details on how the state will address the needs of our most vulnerable populations are found in the program-specific sections of this report.

This State of Connecticut 2021-2022 Action Plan – First Amendment – HOME Investment Partnership Program – American Rescue Plan for Housing and Community Development provides a detailed plan for expending HOME – ARP funds:

The State of Connecticut's FY 2021 HOME-ARP allocation is \$35,939,963.

While the state cannot anticipate what other public or private funds may become available to support our most vulnerable populations, the state will endeavor to maximize and leverage the use of any such resources as they become available.

### **B. Method for Soliciting Applications**

The Department of Housing in collaboration with the Connecticut Housing Finance Authority is inviting any Developer/Owner that is looking to apply for funding and/or other resources from DOH and/or CHFA for the new construction, substantial rehabilitation, and/or preservation of affordable housing in the next calendar year to participate in the *Development Engagement Process*.

This process is intended to identify and to create a pipeline of potential activity for future funding opportunities including but not limited to new construction, substantial rehabilitation and/or preservation of affordable and supportive housing.

Developers/applicants are requested to complete the DOH/CHFA Development Engagement Profile that describes the project, development or concept as it currently stands. There is no requirement to engage a consultant, prepare any formal documentation, obtain any approvals or expend any funds in order to complete and submit the *DOH/CHFA Development Engagement Profile*.

Upon receipt of a *DOH/CHFA Development Engagement Profile*, developers/applicants will be contacted by DOH to schedule a face-to-face meeting with DOH and CHFA staff to discuss the proposed activity outlined. The proposed activity, including the proposed target population to be served, will be evaluated across all available funding sources within the Department's resources, including HOME-ARP, and projects that address eligible target populations will be directed to the use of HOME-ARP.

- Applicants for HOME-ARP must meet the minimum program eligibility and threshold requirements;
- Depending on the nature of the proposed activity, site inspections may be conducted by DOH staff. An evaluation of the site's feasibility will be completed and considered as part of the review process.

### **C. Distribution of Administrative Funds to a Subrecipient**

The State of Connecticut will not be distributing any portion of its HOME – ARP administrative funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

### **D. Geographic Distribution**

Funding under the HOME – ARP program will be available in all 169 communities in accordance with program requirements and target population requirements. Proposals that include responsible growth, livability initiatives or community impact may be prioritized. Refer to **Section IX (D)(1)(d)** below for details.

## E. Use of HOME – ARP Funding

The Department of Housing is prioritizing the creation of affordable housing opportunities for qualified populations, and creating non-congregate shelter opportunities. However, other eligible activities, including TBRA and service funding, may be considered, as part of an otherwise HOME-ARP funded activity.

<b>HOME Investment Partnership Program – American Recovery Plan</b>	
<b><u>TARGETED FUNDING</u></b>	<b><u>HOME - ARP</u></b>
<b>AFFORDABLE HOUSING CREATION</b>	<b>\$ 25,000,000</b>
<b>NON-CONGREGATE SHELTER</b>	<b>\$ 5,548,969</b>
<b>ADMINISTRATION</b>	<b>\$ 5,390,994</b>
<b>TOTAL</b>	<b>\$ 35,939,963</b>

The table above is the estimated allocation of funding per eligible activity. These are estimates only, and do not reflect actual limitations on use of funds.

HOME – ARP funds will only be used for individuals or families from all of the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family's homelessness or would serve those with the greatest risk of housing instability; and veterans and families that include a veteran family member that meet one of the preceding criteria.

DOH is **not** prioritizing one eligible qualifying population over another.

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

The overall lack of affordable housing inventory, as well as the limited availability of non-congregate shelter options has put a significant strain on the qualified populations in Connecticut as well as the shelter delivery system. As part of the response to the COVID-

19 pandemic, Connecticut has been a national leader in providing non-congregate shelter options (deconcentration of our shelters) through the use of hotels/motels as temporary or short-stay options. A review of this effort has continued to show great success, both in terms of service delivery, as well as to offer more independence options to members of the qualified populations. The continuation of this effort through the end of the COVID-19 pandemic, and into the future appears to be a way to provide both direct and immediate assistance, as well as to provide opportunity for further opportunities to benefit the qualified populations into self-sufficiency over the long term.

Taking a similarly targeted approach to the production, preservation, and protection of affordable housing and in particular supportive housing, is seen as a way to transform the state's ability to make its vision of ensuring housing for everyone into a reality.

## **VI. HOME – ARP Housing Production Goals**

### **A. Estimated number of affordable rental housing units for qualifying populations that the State of Connecticut will produce or support with its HOME-ARP allocation**

It is anticipated that the HOME-ARP allocation will support the creation of 100 affordable housing units for qualifying populations, but will also leverage the creation of as many as 1000 affordable housing units, serving households across the affordable housing income spectrum.

### **B. Affordable rental housing production goal that the State of Connecticut will achieve and how it will address the state's priority needs.**

The Department of Housing currently has an annual goal of producing 3,000 affordable housing units, using the wide variety of funding resources available, including both state and federal funds.

This level of production is achievable and will significantly impact both the affordability and availability of housing for low and moderate income households across the State.



## **VII. Preferences**

**Preferences identified, explaining how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the state's needs assessment and gap analysis.**

The Department of Housing does not intend to prioritize within the qualifying populations. Housing and non-congregate shelter opportunities will not be limited by qualifying population groups as part of the funding evaluation process.

## **VIII. HOME – ARP Refinancing Guidelines**

### **A. HOME – ARP Refinancing Guidelines**

The State of Connecticut DOH does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds.

## **IX. Other Requirements**

### **A. Eligible Applicants**

Eligible applicants can include: units of general local government (including other PJ's: Participation Jurisdictions), for-profit and nonprofit entities (including CHDO's). HOME – ARP.

### **B. Eligible Activities – Production**

HOME-ARP funds can be used for four eligible activities including the production or preservation of affordable housing; tenant-based rental assistance; supportive services, including homeless prevention services and housing counseling; and the purchase or development of non-congregate shelter for individuals and families experiencing homelessness. Additionally, HOME-ARP provides up to 15 percent of the allocation for administration and planning costs of the participating jurisdiction and for subrecipients administering all or a portion of the grant.

## **C. Eligible forms of Subsidy**

Forms of assistance can include, but are not limited to: loans or advances (interest or non-interest bearing), deferred loans (forgivable or repayable), grants, interest subsidies, equity investments, loan guarantees, and loan guarantee accounts.

## **D. Program Eligibility and Threshold Requirements**

### **1. Evaluation Criteria for HOME - ARP**

The following are categories of evaluation criteria and descriptions of factors that may be considered within each category.

#### **1. Affordability, Marketability, and Fair Housing and Equal Opportunity**

The project must meet one or more of the priorities as outlined in the ConPlan. This category will consider: the overall housing and community development needs of the site; the neighborhood, the community, the municipality and the region in which the activity is proposed; the documented need for the specific activity proposed; the extent to which qualified populations will be served or will benefit; the extent to which health and safety issues apply; the extent to which the proposal addresses the community's special needs housing and a market analysis of the proposed activity and waiting lists (if appropriate). This category also includes a rating of the applications demonstration of how it will meet DOH established fair housing goals and requirements. DOH will consider the demonstration of a previously approved and active Fair Housing Action Plan, and the applicant's performance in achieving the goals of the plan. The extent to which the proposed activity addresses elements in the state's Analysis of Impediments Action Plan will be considered. This category will also consider the extent to which a proposal promotes racial and economic integration, the extent to which the proposal offers housing choice and opportunities to qualified populations.

#### **b. Project Feasibility and Readiness to Proceed**

DOH must expend federal funds in a timely manner; therefore, priority shall be given to all projects that have a "ready to proceed" status. "Ready to proceed" means that necessary approvals are in place, such as permits, funding, certifications, etc. This category will consider distinct areas: site, development, and operational feasibility.

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Connecticut Department of Housing*

Site feasibility will consider the environmental condition of the proposed activity, site control, current zoning and approvals, infrastructure condition and needs, the presence of hazardous materials, and historic preservation requirements. Development feasibility will consider project cost including total development cost, per unit cost and program cost (“soft cost”), proposed development budget, appraisals, funding commitments from other sources, the extent to which the HOME-ARP funds are used as gap financing or funding of last resort, relocation, project time line, and project readiness to proceed. Operational feasibility will consider proposed operating budget, proposed rents and/or purchase prices, the reasonableness of operating expenses including fees, and cash flow projections for the project.

**c. Applicant/Sponsor Capacity**

All applicants must meet all thresholds and be in full compliance with any and all assistance agreements with DOH and cannot be in default under any DOH, CHFA or HUD-administered program. This category will consider the applicant’s success with previous DOH funded projects, development experience, experience of the development team and staff, management experience, performance in administering previous grants and/or loans from DOH, and performance in promoting fair housing and equal opportunities.

**d. Responsible Growth, Livability Initiatives, and Community Impact**

Responsible growth<sup>1</sup> includes economic, social and environmental development that incorporates land use and resources in ways that enhance the long-term quality of life for current and future generations of Connecticut residents. Responsible growth supports a vibrant and resilient economy and maximizes previous investments in infrastructure in Connecticut while preserving its natural resources, distinctive landscapes, historic structures, landmarks, and villages. DOH may give preference to projects that satisfy the following responsible growth criteria:

- Conformance with the goals and development and conservation criteria of the current Conservation and Development Policies Plan for Connecticut;
- Have regional development emphasis or are result of regional collaborations;

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<sup>1</sup> As per the Governor’s Executive Order No. 15, DOH is actively adopting responsible growth principles in all its policies and programs.  
2021-22Action Plan for Housing and Community Development  
Connecticut Department of Housing

- Reuses and rehabilitates existing property, infrastructure, and land;
- Are sited within existing developed areas and promote infill development;
- Are sited within existing public utilities service areas (water, sewer, etc.);
- For projects outside of public utility services areas, scaling down to use on-site systems, where practicable, to manage unplanned development of adjacent land;
- Promote transit-oriented development<sup>2</sup>;
- Provide or leverage educational opportunities at all grade levels;
- Promote the livable characteristics of the sustainable communities' initiative<sup>3</sup>;
- Promote mixed-use<sup>4</sup> development and compatible land uses (pedestrian-friendly with access to multiple destinations within close proximity of each other);
- Integrate sustainable building characteristics such as energy/water conservation, energy efficiency and "green" building into project design; and
- Avoid adverse impacts to natural and cultural resources and open space.
- DOH may consider the community impact of a proposal and whether the proposal is part of a comprehensive planning process for the community, such as a Community Revitalization Strategy, Plan of Development or similar planning effort. The applicant must provide evidence of the planning effort supporting the project. This category will consider: the relationship between the proposed activity and the other housing; housing activities that are planned or underway in the impacted neighborhood; the relationship of the proposed activity to priorities identified in the municipality's or region's plan of development; the economic impact of the proposed activity; local government support for the proposed activity; neighborhood support for the proposed activity and if the proposed activity is located in a targeted investment area, such as a Neighborhood Revitalization Zone or Enterprise Zone.

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<sup>2</sup> "Transit-oriented development" as defined in the June Special Session, Public Act No. 07-7 of the Connecticut General Assembly, is the development of residential, commercial and employment centers within one-half mile or walking distance of public transportation facilities, including rail and bus rapid transit and services, that meet transit supportive standards for land uses, built environment densities and walkable environments, in order to facilitate and encourage the use of those services.

<sup>3</sup> HUD, the USDOT and the EPA have entered into a "partnership to help American families gain better access to affordable housing, more transportation options, and lower transportation costs while protecting the environment in communities". This initiative, known as the Sustainable Communities Initiative, is based on livability principles that emphasize integration of land use with transportation - See "HUD and Dot Announce Interagency Partnership to Promote Sustainable Communities", HUD Press Release No. 09-023, March 18, 2009

<sup>4</sup> Mixed-use refers to a variety of land uses such as residential, retail, commercial, business, office, public, and recreational.

**Attachment A**

- Attachment A-1 List of Organizations Consulted
- Attachment A-2 Consultation Meeting Notes
- Attachment A-3 Citizen Participation Plan – Effective 6/1/2020
- Attachment A-4 Public Participation – Virtual Public Hearing/Public comment

**Continuum of Care Partners:**

**Opening Doors – Connecticut (All sub-continua were consulted)**

Opening Doors of Fairfield County  
Pacific House  
Family and Children's Agency  
Alpha Community Services YMCA  
Supportive Housing Works  
Catholic Charities of Fairfield Count  
Inspirica, Inc.  
Career Resources  
The Workplace  
Homes with Hope  
New Reach  
Community Action of Western Connecticut  
Mid-Fairfield AIDS Project  
Homes for the Brave  
Open Door Shelter  
Triangle Community Center  
Council of Churches Greater Bridgeport  
Catholic Charities of Costal Fairfield Count  
Community Health Network CT  
Malta House  
Recovery Network of Program  
Norwalk Hospital/Western CT Health Network  
Community Health Network of CT  
Southwestern Regional Mental Health Board  
Residential Network of Programs  
New Neighborhoods, Inc.  
Operation Hope

**Balance of State- Continuum of Care (All sub-continua were consulted)**

**Coordinated Access Networks (all member agencies)**

Central CAN  
Greater New Haven CAN  
Fairfield County CAN  
Eastern CAN  
Middlesex Meriden Wallingford CAN  
Northwest-CT CAN  
Greater Hartford CAN

**Community Partners:**

ACLU CT  
AIDS CT  
Partnership for Strong Communities  
CT Nonprofit Alliance  
Connecticut Coalition to End Homelessness  
Council of Small Towns  
Capital for Change  
Connecticut Conference of Municipalities  
CCMC-KIDS  
Corporation for Independent Living  
Community Renewal Team, Inc.  
Imagineers, LLC  
CT FSA  
Fair Housing Center of Connecticut  
Local Initiative Support Corporation  
NHS of Waterbury  
Regional Plan Associates  
Statewide Legal Aid  
CANPFA  
Urban Initiatives  
Nolan Real Estate  
Eastern Connecticut Housing Organization  
MAPPLAN  
Aorcin Consultants  
Becker and Becker  
Pennrose Development  
Cherry Street Holding LLC  
Community Solutions  
J. D'Amelia & Associates  
JHM Financial Group  
Elderly Housing Development and Operations Corporation  
Forstone Capitol  
Landmarkarch  
Honey Comb Real Estate  
Housing Development Team  
Millennium Realty  
Sheldon Oak Central  
NeighborWorks New Horizons  
Newcastle Development  
New Charles St Associates  
Spinnaker Real Estate Partners  
Corcoran Jennison Associates  
Migani-Reardon Architects  
Housing Enterprises  
MHA of Greater Hartford  
Loom City Lofts LLC  
NHS of New Haven  
TAROB LLC  
The Community Builders – Connecticut

The Access Agency  
The Geer Corporation  
The Roche Group  
Trinity New Haven LLC  
Two B-C Realty LLC  
Verizon  
VERN LLC  
Vesta Corporation  
Vinewood Apartments Coop  
WINN Development

**State Agency Partners:**

Department of Education  
Department of Mental Health and Addiction Services  
Department of Developmental Services  
Department of Children and Families  
Department of Veteran's Affairs  
Department of Social Services  
Department of Public Health  
Department of Higher Education  
Department of Energy and Environmental Protection  
Office of Policy and Management

**Housing Authorities:**

CONN-NAHRO (92 individual housing authorities)



## **Round Table Discussion for Community Partners**

Input into the development of the State of Connecticut HOME – ARP Allocation Plan

Tuesday, October 19, 2021  
10:00 am to 11:00 am  
Teams Meeting

Comments/Questions put forward were the following:

- Jennifer Paradis (Bethel Center): The state has general homeless data with point-in-time counts, etc. If people have data to refine this, more specifics to a population or subcategory under this, we would want this data.
- Peter Dibiasi: Clarification on the priorities list between at-risk homeless and things to prevent homeless: 4) is broad- we have to define and we need to justify the subcategory with data; 2) at-risk homeless is specific definition under 24 CFR 91.5
- Matthew Morgan (Journey Home): They are helping a large number of people who were literally homeless get matched up with rental assistance. This assistance runs out September 2022 and they need more funding to continue helping these people – HOME ARP assistance can be used to supplement or replace – need to do a new project – a new target audience.
- Peter Dibiasi: Length of support services – we have this money until 2030 so theoretically you can stretch out a project.
- Peter Dibiasi: Are there geographic priorities? – not required under the plan.
- Jennifer Paradis: With a two year timeline, there is strong evidence for construction.
- Matthew Morgan: ACS is best data source if you have others the state will take it (homeless resources available).
- Sarah Fox: They have lots of data – the grant requires data to support something new.
- Matthew Morgan: If a program is serving new clients can it be used to support an existing provider? – this is not possible but if there is a subpopulation from this group and you have data to back up, then that could work.
- Jennifer Paradis: Wanted to know thought the department was having – our commissioner is from development community. However, we are considering all eligible activities, but they do need to be data driven. We do expect to produce some new units whether they be new or NCS non-congregate opportunities ie: we could acquire hotel and convert to permanent affordable housing units. So to summarize we do have data supporting the production of new affordable housing, we do have 360 new emergency vouchers, existing State RAP, existing Section 811 PRA, etc. It is fair to say we will produce some, but we want to work with the community new data driven projects.

## **Round Table Discussion for Continuum of Care Partners**

Input into the development of the State of Connecticut HOME – ARP Allocation Plan

Monday, October 18, 2021  
10:00 am to 11:00 am  
Teams Meeting

Comments/Questions put forward were the following:

- Carmen Colon (ACS): In regard to supportive services, it would be good if we could expand upon current services when the money source for them runs out. This would have a great impact on addressing immediate needs before adding anything new.
- Monssour Hanne (DMHAS): Can a state agency apply for supportive services that don't have case management yet?
- David Rich (SHW): Want the CoC's to be a true part of the consultation process and not for it to be just a box checking exercise.
- David Rich (SHW): Want to focus on exclusively the homeless population, especially the literally homeless population.
- Kara Capone (Mercy): When Cares Act funding utilized for increased services, diversion, and outreach runs out, can we use this money to continue those services?
- Kara Capone (Mercy): We need a balanced approach to developing housing and also helping the homeless.
- Carmen Colon (ACS): We need to look at what has already been done, look at the whole picture and allocate funds from that perspective. We tend to always be chasing funds. Believes developing emergency shelter is not the way to go. We need to develop more housing. The data demonstrates that if we have housing, then we don't need temporary shelter. We need to look at what the money was intended for and then add services.
- Shannon Quinn-Sheeran (Housing Innovations): We should look at existing projects and identify what gaps there are in the system. For the latest Point-in-Time count we have 30+ people on the street, about 1700 sheltered homeless. We should do housing development with something that exists already because the shelter are full.
- Pam Ralston (SHW): Can the state provide resources in jurisdictions that are already receiving funding HOME – ARP funding allocation for something else?
- David Rich (SHW): Reiterating how important putting funding into helping the literally homeless is best. We have Section 8, new development, etc. and we need to look at how to use the money most effectively.
- David Rich (SHW): We need to address need now and not only for what several years from now if housing takes that long to develop.
- Carmen Colon (ACS): They created permanent supportive housing by converting existing shelter units and it took about 1 and ½ years. They will need to help the state identify potential projects if we go his way.
- Amanda Gordon (Community Housing Advocates): would be good to work with leveraging existing mainstream services such as the housing authorities to supply people with supportive housing services.

## **Round Table Discussion for Housing Authority Partners**

Input into the development of the State of Connecticut HOME – ARP Allocation Plan

Monday, October 18, 2021  
1:00 pm to 2:00 pm  
Teams Meeting

Comments/Questions put forward were the following:

- John Kukulka (Bridgeport): in regard to TBRA, they have many tenants who have not been able to pay their rent – directed to enroll in UniteCT.
- Elizabeth Sulik (Stratford): Will send list of HA's on our list.
- Ann Marie Perrone (Stafford): Wanted to look at population slide.
- Joseph D'Ascoli (Manchester): Supportive services need to be there or this program may not work. Housing authorities need a contact person that will help with case management. Need services available for 24/7.
- Anthony Vasiliou: Worries that if we are chasing existing populations we may not be able to identify new populations. We should do additional analysis to identify new populations – we can do this but we will need a clear definition and data to back up. Steve DiLella added that HUD wants to help people with barriers who cannot self-advocate. We have many subpopulations in the five eligible categories. Anthony added that we should advocate for people with mental health problems especially since the pandemic.
- Colleen Lauer (Ledyard Housing Authority): Works with SSHP, as their rent increases she is worried about some tenants who will not be able to pay the rent and be at risk for homelessness. Michael will get together with her and the CHFA Asset Manager to help find a solution.
- Michael announced that housing authorities are invited to work with UniteCT to help tenants pay rent who were COVID affected.

## **Round Table Discussion for State Agency Partners**

Input into the development of the State of Connecticut HOME – ARP Allocation Plan

Thursday, October 21, 2021  
11:00 am to 12:00 pm  
Teams Meeting

Comments/Questions put forward were the following:

- Alice Minervino (DMHAS): In looking at who we could possibly serve, with the 1915i Medicaid waiver coming due, there are people who will be discharged from treatment. Could this be an option for them? Maybe we could provide rental assistance for them. Recovery coaches are available to these people already. Under qualified persons this could be a subpopulation for #4 or maybe even #2 for qualified persons. Maybe we could do TBRA and support services. We need to get data to support this need. Remember TBRA has a time limit of two years. (Can we run this similar to rapid rehousing?) Get us data by end of November.
- Terry Nash (CHFA): Great to see money for affordable housing and development. 70% of units we assist need to be serving qualifying populations. TBRA is only for two years. Support services are one shot deal, we have till 2030 to spend....but when it runs out it is not renewable. Case management is eligible.
- Josh Scalora (DDS): Possibly may have a subpopulation under #4 qualifying populations. As of July 1<sup>st</sup> they have 897 people on a waiting list, of which 40 people are requesting community based housing, instead of congregate housing. DDS is also doing a “period of transitioning” model program where people move out after they develop skills. There might be some data to support this. Clarification on being able to use these HOME-ARP funds with other funds...just needs to be a new activity backed up with data. We cannot continue a program that ran out of funds.
- Claudio: Yes, we can tie TBRA to an existing social service for example. We cannot extend existing services.
- Louis Tallerita (Department of Education): DOE’s definition of homeless is different than the definition of homeless for this program, but the homeless population at the school (which is often people just doubling up), may be eligible under a subpopulation of the #2 qualifying population. Steve DiLella mentioned that the state is presently utilizing Section 8 Emergency Vouchers for a pilot program targeting literally homeless people/families. The state is also doing something with OEC families which are families who have children under the age of 6. So in summary, we need to define the niche and supply data to back it up.
- Alice Minervino (DMHAS): may have another subpopulation that she will submit data on.

## Attachment A-3

### Citizen Participation Plan

The following is the citizen participation and engagement process that will be utilized by the Department of Housing (“**DOH**”) to solicit participation and input into the planning process for the development of the Five Year Consolidated Plan for Housing and Community Development (“**ConPlan**”) and the Annual Action Plans (“**AAP**”) that support it. In addition, this process will be used whenever possible in the development of all other plans and amendments prepared by DOH. This includes the development of the Analysis of Impediments to Fair Housing Choice (“**AI**”), as well as any required state plans and amendments that support the housing and community development activities of DOH.

Periodically throughout any given year, DOH staff will meet with state agency partners and major interest groups to discuss a variety of housing and community development issues in order to collect information on needs, priorities and issues of interest.

- These meetings will be part of continuous input into the departments' planning and policy development activities as they relate to housing and community development issues.

These major interest groups include, but are not limited to:

- the chief elected officials of entitlement and non-entitlement communities
- the Connecticut Branch of the National Association of Redevelopment Officials
- the Balance of State: Continuum of Care
- other Continuum of Care in Connecticut
- the nonprofit and for profit development community
- the Councils of Government and other regional planning organizations
- the legal aid organizations
- the housing advocacy community

Whenever possible, prior to the development of any relevant plan, the DOH will:

- Hold at least one public meeting, which may include a virtual public meeting, to solicit input in the development of such plan.
  - If a virtual meeting is being held, the meeting will also have a call in number for those individuals who do not have computer access.
  - Notice of this meeting will be published approximately 1 week in advance of the meeting, in at least 3 newspapers serving all regions of the state, as well as the state's minority communities.
  - In addition, notice of the meeting will be emailed to the above referenced major interest groups, and/or other state agencies as well as all interested residents of Connecticut who have expressed an interest in receiving information on all activities of the Department, known as the “Community Partners” list.
- Solicit written comment/input into the development of such plan for not less than five (5) days.

Staff will prepare a draft plan, taking into consideration the input received as a result of input/comment from the above listed organizations, state agencies and interested parties. As appropriate, the plan will include a discussion of the amount of assistance the state expects to receive, the range of activities it will undertake with this assistance, and, to the extent possible, the benefit to low and moderate income people of these proposed activities.

DOH will:

- Post the draft plan in a prominent place on the DOH website.
- Prepare a notice of the publication of such plan (“**Notice**”) and such Notice will include information on the following opportunity for input/comment:
  - DOH will hold at least one public meeting, which may include a virtual public meeting, to solicit input in the development of such plan.
    - If a virtual meeting is being held, the meeting will also have a call in number for those individuals who do not have computer access.
    - Notice of this meeting will be published approximately 1 week in advance of the meeting, in at least 3 newspapers serving all regions of the state, as well as the state's minority communities.
  - The Notice will include the opportunity to provide electronic comment for a period of not less than five days.
  - As part of the Notice, the state will provide information on how citizens who have special needs may obtain the draft plan in a form which is accessible to them.
- In addition, the Notice will be emailed directly to the above referenced major interest groups, and/or other state agencies as well as all interested residents of Connecticut who have expressed an interest in receiving information on all activities of the Department, known as the “**Community Partners**” list.

Such Notice will be published in at least three (3) newspapers of general circulation, and will include at least one (1) minority publication.

Copies of the Notice will be emailed to all interested parties who have registered with DOH as part of its “**Community Partners**” list, as well as the governmental leaders of all 169 towns/cities in the State, and the seven (7) councils of government.

Any comments received, either at the public hearing or during the public comment period will be considered by DOH before the final plan is submitted to U.S. Department of Housing and Urban Development (HUD). A summary of the comments and the agency's responses will be included as an attachment to the final action plan.

The procedures and actions discussed above will constitute the state's citizen participation plan for HUD related documents that require citizen participation.

This citizen participation plan will itself be made available to the public for a five-day public comment period prior to implementation, and any interested groups may review and comment accordingly.

## **Attachment A-4**

### **Public Participation - Virtual Public Hearing/Public Comment**

In accordance with Connecticut's Amended Citizen Participation Plan (See Attachment A-1) and in an effort to give reasonable notice and an opportunity to comment, DOH solicited public input in order to: 1) solicit input into the development of the draft State of Connecticut HOME-ARP Allocation Plan (Consultation Process); and 2) solicit feedback and comments on the draft State of Connecticut HOME-ARP Allocation Plan (Public Participation).

DOH solicited input on the draft State of Connecticut HOME-ARP Allocation Plan through a fifteen (15) day public comment period from January 20, 2022 thru February 4, 2022. DOH held a virtual public hearing on the draft State of Connecticut HOME-ARP Allocation Plan on Thursday, February 3, 2022. A legal notice was published in four newspapers across the state including one in Spanish announcing the public hearing and comment period. (See Attachment B-1). The legal notice and related documents are available on DOH's website. As part of the notice, DOH included information on how citizens who have special needs may obtain the allocation plan in a form which is accessible to them. Housing authorities, municipalities, non-profits, advocates and the general public were invited to attend this public meeting and provide input/comment on the Draft State of Connecticut HOME Investment Partnerships Program-American Rescue Plan ("HOME-ARP") Allocation Plan.

#### **Outline of Activity for Public Hearing/Public Comment:**

All comments received both at the public hearing and in writing have been summarized and responded to as follows:

**General Edits:** A number of general edits not materially affecting the policies, priorities or allocations within the document were received.

**Response:** All relevant edits were made accordingly, including adjustments of awarded and anticipated funding.

**General Policy Statements:** A number of general policy statements supporting the policies and priorities identified in the Action Plan were provided by a number of commenters.



**Response:** The Department appreciates the support for its policies and priorities as drafted and is committed to an inclusive and participatory process in the implementation of its programs and the expenditure of its funding.

**Summary of Specific Comments from Public Hearing:**

**There was a concern that this money truly be prioritized for the people who are homeless.**

**Response:** All referrals for funds coming through HOME – ARP will be made through the Coordinated Access Networks (CANs). Those who are most vulnerable will be served. The Department does not want to limit access to housing opportunities created with this funds, as there are qualified households referred through the coordinated access network who are not literally homeless, but have significant need.

**There was an offer/comment on keeping the Department of Public Health involved with making sure that housing is environmentally safe.**

**Response:** The Department is committed to continuing interagency collaboration and coordination, particularly as it relates to safe housing.

**There was a question/concern on exactly what the money would be used for, bricks and mortar versus support services.**

**Response:** The Department will be looking at the creation of affordable housing opportunities for qualified populations and creating non-congregate shelter opportunities. The Department will also consider other eligible activities which can include supportive services and tenant based rental assistance for qualified populations, but we are not prioritizing any of the sub population groups. These funds can only serve qualified populations and it is our intent to have all of those referrals come through our Coordinated Access Network.

With regard to TBRA and social services, although they are not specifically called out as a priority, they are eligible activities, and may be considered. The Department's clear priority based on the needs gap analysis data is the volume of housing stock or a lack thereof. There

are just not enough units/housing opportunities available. The Department understands the value of appropriate services and are looking into identifying other resources to assist the social service community.

**There were several comments stressing the importance of social services to help keep people in their affordable housing units.**

**Response:** The Department appreciates and recognizes the importance of social services relative to the qualified populations targeted for these resources.

**There were several comments supporting leveraging resources, equity and healthy/safe housing for our most vulnerable populations including not building in flood zones, lower energy burdens and energy emissions, onsite solar-battery storage backups, and outdoor play areas shaded by trees.**

**Response:** The Department appreciates and agrees that leveraging resources to support equity and healthy/safe housing for our most vulnerable populations is vital, and will continue to work with our state partners and community partners to provide equitable, quality affordable and safe/energy efficient housing.

**There was a comment supporting bricks and mortar construction for more deeply affordable housing for homeless populations. Echo of support for leveraging resources among state agencies and community partners for social services especially in light of HOME - ARP funding only allowing 2-3 years coverage of social services.**

**Response:** The Department is appreciative of the support for its proposed policies.

**There was as concern that the state was substituting federal money for available state money for bricks and mortar.**

**Response:** The Department believes that we can accomplish more deep income targeting with HOME – ARP funding by leveraging it with state resources. State resources are not being swapped out, but rather these funds are being used to enhance and expand the impact of the State's investment in affordable housing production.

**There was a concern for DOH to address energy efficiency and to utilize CHFA standards.**

**Response:** The Department considers energy efficiency a critical component and currently utilize CHFA standards for projects that we finance.

**There was a question about whether we could address renovating existing housing to meet deep energy retrofit type standard?**

**Response:** HOME – ARP funding is intended to create new affordable housing opportunities, and does not allow for rehabilitation/renovation of existing structures for preservation.

**There was support for promoting partnerships with Connecticut Green Bank, the Department of Energy and Environmental Protection, Public Utilities Regulatory Authority and the electric and gas companies to reduce energy burden and increase resilience for those that benefit through the Plan.**

**Response:** The Department appreciates the support and looks forward to working with Connecticut Greenbank, the Department of Energy and Environmental Protection, Public Utilities Regulatory Authority, and the electric and gas companies to reduce energy burden and increase resilience for those that benefit through the Plan.

**There was support for the development of non-congregate shelter and permanent affordable housing for individuals, families, and youth experiencing homelessness, as well as for supportive services for these populations.**

**Response:** The Department is looking forward to working with the Partnership for Strong Communities, the Connecticut Coalition to End Homelessness, the Reaching Home Campaign and our many other Community Partners to help support individuals experiencing homelessness and at-risk of homelessness.

Again, all referrals for qualified populations in unites financed through HOME – ARP will be made through the Coordinated Access Networks (CANs).

**There was a comment/recommendation supporting the planned activities in the Plan and to prioritize people experiencing literal homelessness or setting aside a minimum number of units for them for housing and ongoing supportive services over other eligible populations.**

**Response:** The Department thanks you for your support and again Again, all referrals for qualified populations in unites financed through HOME – ARP will be made through the Coordinated Access Networks (CANs).

**There was a comment requesting the Department to consider providing grants in support of the operating expenses of housing and homelessness providers, in addition to using the funding to establish new housing opportunities.**

**Response:** The Department appreciates the comment, however, in accordance with the *Final HOME - ARP Implementation Notice*, under *F. Nonprofit operating and Capacity Building Assistance*, a PJ may only award operating expense assistance or capacity building assistance to a nonprofit organization if it reasonably expects to provide HOME\_ARP funds to the organization for a HOME-ARP eligible activity (Develop affordable housing, create non-congregate shelter opportunities) within 24 months of the award.

## **Attachment B – Citizen Participation Documents**

- Attachment B-1 Round Table invites for Consultation Process and Draft Notice of Virtual Public Hearing and Community Input Period for the development of the Draft State of Connecticut HOME Investment Partnerships Program - American Rescue Plan (“HOME-ARP”) Allocation Plan
- Attachment B-2 Virtual Public Hearing Recording
- Attachment B-3 Written Comments

## Attachment B-1

### **Round Table Discussion for Housing Authority Partners**

Input into the development of the State of Connecticut HOME – ARP Allocation Plan

Monday, October 18, 2021  
1:00 pm to 2:00 pm  
Teams Meeting

The Connecticut Department of Housing (DOH) *invites* you to the **Round Table Discussion for input into the preparation of the State of Connecticut HOME Investment Partnerships Program - American Rescue Plan (“HOME – ARP”) Allocation Plan**. HOME – ARP funds are allocated to help communities provide housing, shelter, and services for the most vulnerable populations. HOME – ARP funds are in addition to the state’s regular FY 2021 HOME formula allocation.

The State of Connecticut’s HOME- ARP allocation is \$35,939,963. HOME – ARP funds must be used for individuals or families from the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family’s homelessness or would serve those with the greatest risk of housing instability; and veterans and families that include a veteran family member that meet one of the preceding criteria.

The purpose of this Round Table Discussion is to consult with agencies and service providers whose clientele include the HOME - ARP qualifying populations to identify unmet needs and gaps in housing or service delivery systems.

Department of Housing programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to the ADA (504) Coordinator at 860-270-8022. The location for this meeting is handicapped accessible.

**Round Table Discussion  
for  
Continuum of Care Partners**

Input into the development of the State of Connecticut HOME – ARP Allocation Plan

Monday, October 18, 2021  
10:00 am to 11:00 am  
Teams Meeting

The Connecticut Department of Housing (DOH) *invites* you to the **Round Table Discussion for input into the preparation of the State of Connecticut HOME Investment Partnerships Program - American Rescue Plan (“HOME – ARP”) Allocation Plan**. HOME – ARP funds are allocated to help communities provide housing, shelter, and services for the most vulnerable populations. HOME – ARP funds are in addition to the state’s regular FY 2021 HOME formula allocation.

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**Round Table Discussion  
for  
Community Partners**

Input into the development of the State of Connecticut HOME – ARP Allocation Plan

Tuesday, October 19, 2021  
10:00 am to 11:00 am  
Teams Meeting

The Connecticut Department of Housing (DOH) *invites* you to the **Round Table Discussion for input into the preparation of the State of Connecticut HOME Investment Partnerships Program - American Rescue Plan (“HOME – ARP”) Allocation Plan**. HOME – ARP funds are allocated to help communities provide housing, shelter, and services for the most vulnerable populations. HOME – ARP funds are in addition to the state’s regular FY 2021 HOME formula allocation.

The State of Connecticut’s HOME - ARP allocation is \$35,939,963. HOME – ARP funds must be used for individuals or families from the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family’s homelessness or would serve those with the greatest risk of housing instability; and veterans and families that include a veteran family member that meet one of the preceding criteria.

The purpose of this Round Table Discussion is to consult with agencies and service providers whose clientele include the HOME - ARP qualifying populations to identify unmet needs and gaps in housing or service delivery systems.

Department of Housing programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to the ADA (504) Coordinator at 860-270-8022. The location for this meeting is handicapped accessible.



**Round Table Discussion  
for  
State Agency Partners**

Input into the development of the State of Connecticut HOME – ARP Allocation Plan

Thursday, October 21, 2021  
11:00 am to 12:00 pm  
Teams Meeting

The Connecticut Department of Housing (DOH) *invites* you to the **Round Table Discussion for input into the preparation of the State of Connecticut HOME Investment Partnerships Program - American Rescue Plan (“HOME – ARP”) Allocation Plan**. HOME – ARP funds are allocated to help communities provide housing, shelter, and services for the most vulnerable populations. HOME – ARP funds are in addition to the state’s regular FY 2021 HOME formula allocation.

The State of Connecticut’s HOME - ARP allocation is \$35,939,963. HOME – ARP funds must be used for individuals or families from the following qualifying populations: homeless; at-risk of homelessness; fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking; other populations where providing assistance would prevent the family’s homelessness or would serve those with the greatest risk of housing instability; and veterans and families that include a veteran family member that meet one of the preceding criteria.

The purpose of this Round Table Discussion is to consult with agencies and service providers whose clientele include the HOME - ARP qualifying populations to identify unmet needs and gaps in housing or service delivery systems.

Department of Housing programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to the ADA (504) Coordinator at 860-270-8022. The location for this meeting is handicapped accessible.

**NOTICE OF VIRTUAL PUBLIC HEARING AND COMMUNITY INPUT PERIOD**  
**The State of Connecticut Department of Housing**  
**is seeking public comment on the Draft State of Connecticut HOME Investment Partnerships**  
**Program – American Rescue Plan (“HOME – ARP”) Allocation Plan**

A fifteen (15) day public comment period will begin on Thursday, January 20, 2022 and end on Friday, February 4, 2022. The Connecticut Department of Housing (DOH) **is looking for public comment on the Draft State of Connecticut HOME Investment Partnerships Program - American Rescue Plan (“HOME – ARP”) Allocation Plan.** HOME – ARP funds are allocated to help communities provide housing, shelter, and services for the most vulnerable populations. HOME – ARP funds are in addition to the state’s regular FY 2021 HOME formula allocation. The State of Connecticut’s HOME – ARP allocation is \$35,939,963.

The Department of Housing will conduct a VIRTUAL PUBLIC MEETING on Thursday, February 3, 2022 beginning at 10:00 AM and ending when all attendees have had an opportunity to provide input and comment. Housing authorities, municipalities, non-profits, advocates and the general public are invited to attend this public meeting and provide input/comment on the Draft State of Connecticut HOME Investment Partnerships Program - American Rescue Plan (“HOME – ARP”) Allocation Plan. If you or your organization is interested in participating in the VIRTUAL PUBLIC MEETING, please send an e-mail to [CT.HOUSING.PLANS@ct.gov](mailto:CT.HOUSING.PLANS@ct.gov) with “*Virtual Public Meeting – DRAFT HOME – ARP Allocation Plan*” in the “Subject” line. An E-mail link will be sent to all registered participants using the Microsoft TEAMS application.

DOH will also accept electronic input/comment on the administration of these funds through 5:00 pm on Friday, February 4, 2022 at [CT.HOUSING.PLANS@ct.gov](mailto:CT.HOUSING.PLANS@ct.gov). All input and comments received will be taken into consideration. For a copy of on the Draft State of Connecticut HOME Investment Partnerships Program - American Rescue Plan (“HOME – ARP”) Allocation Plan, please refer to the Department of Housing’s website, <http://www.ct.gov/doh> under Notices and Publications, or you may request a copy via email at the above address.

Department of Housing programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to the Department of Administrative Services - Small Agency Resource Team 860-270-8022.

## **B-2 Virtual Public Hearing Recording**

**[CT DOH Notices-Public Hearings-Publications](#)**

## **B-3 Written Comments**

Please see attached comments.



February 4, 2022

Commissioner Seila Mosquera-Bruno  
Connecticut Department of Housing  
505 Hudson Street  
Hartford, CT 06106

Dear Commissioner Mosquera-Bruno,

Thank you for the opportunity to provide comments on the Draft State of Connecticut HOME Investment Partnerships Program - American Rescue Plan ("HOME – ARP") Allocation Plan. We also appreciate the listening sessions held last fall to solicit feedback on the plan from community nonprofits and fellow housing advocates.

The Alliance is the statewide organization representing the nonprofit sector. Community nonprofits provide essential services to over half a million individuals and families in Connecticut every year, and employ 14% of Connecticut's workforce, improving the quality of life in communities across the State.

We are encouraged to see the focus in the draft plan is on developing non-congregate shelter and permanent affordable housing. Establishing access to both of these critical resources is important to helping Connecticut's most vulnerable residents recover from the pandemic.

In addition, we understand one of the allowable uses for the HOME-ARP funding is to provide grants of up to five percent for housing and homelessness providers for general operating support. Based on our understanding of the plan, it appears the Department's expenditure plan does not expressly include that support. We encourage you to consider providing grants in support of the operating expenses of housing and homelessness providers, in addition to using this funding to establish new housing opportunities.

Below are a few reasons why operating support is so important:

- This year, inflation grew by almost six percent, surpassing the Cost of Living Adjustment in the current year's budget. It is critical that the State increase funding above that initial allocation over the next several years.
- Housing providers face unprecedented challenges attracting and retaining staff of all skill levels and salaries. As an example, nonprofit providers are now in competition with employers such as Amazon and Walmart that require no specialized training, are paying more and offering more hiring incentives.
- The COVID-19 pandemic continues to present operational and financial challenges for housing providers. As an example, due to changing public health guidance, housing providers may have increased costs to keep people safe such as adjusting bed capacity, overtime costs due to vacancies or positivity among staff, hazard pay for working with COVID+ clients, etc.

Thank you for your consideration of these comments in the final allocation plan.



Sincerely,

A handwritten signature in dark blue ink, appearing to read "Gian-Carl Casa".

Gian-Carl Casa  
President & CEO  
CT Community Nonprofit Alliance

75 Charter Oak Avenue, Suite 1 - 103, Hartford, CT 06106  
T 860.563.0015  
ctgreenbank.com



February 3, 2022

Connecticut Department of Housing  
505 Hudson Street  
Hartford, CT 06106-7106

Via Electronic Service to [CT.HOUSING.PLANS@ct.gov](mailto:CT.HOUSING.PLANS@ct.gov)

**RE: Draft State of Connecticut HOME Investment Partnerships Program - American Rescue Plan ("HOME – ARP") Allocation Plan**

To the Department:

The Connecticut Green Bank ("Green Bank") appreciates the opportunity to provide comment to the Connecticut Department of Housing ("DOH") on the above-captioned subject, pursuant to its Notice of Virtual Public Hearing and Community Input Period issued January 20, 2022. The following comprises our comments regarding the HOME – ARP Allocation Plan (the "Plan").

In addition to the excellent DOH Plan, which proposes resources to be used for individuals or families that are homeless, at-risk of homelessness, fleeing or attempting to flee domestic violence, sexual assault, stalking, or human trafficking, and including veterans experiencing the same, the Green Bank would like to raise the awareness of developers receiving such HOME-ARP resources about the importance of resources for addressing energy burden and insecurity as well.

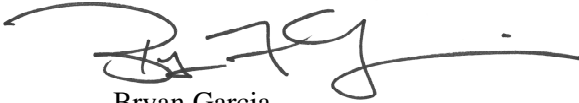
These individuals or families will likely experience energy burden, whereby a large portion of household income (i.e., above 6%) is spent on energy. They will also likely experience poor energy resilience, whereby they are susceptible to social and physical impacts from a grid outage as a result of climate change. There are additional resources developers can access for addressing energy through the following programs to better lives of individuals and families, including:

- **Home Energy Solutions Income Eligible** – <https://energizect.com/your-home/solutions-list/save-energy-and-money-all-year-long> a no-cost in-home assessment and weatherization services;
- **Residential Renewable Energy Solutions** – <https://portal.ct.gov/pura/electric/office-of-utility-programs-and-initiatives/clean-energy-programs/residential-renewable-energy-solutions-program> including additional incentives for low-income households, families located in distressed communities, or affordable housing;
- **Energy Storage Solutions** – <https://portal.ct.gov/pura/electric/office-of-utility-programs-and-initiatives/clean-energy-programs/energy-storage-solutions-program> including additional incentives for low-income households, families located in distressed communities, or affordable housing.

On behalf of our partners at the Department of Energy and Environmental Protection (“DEEP”), Public Utilities Regulatory Authority (“PURA”), and the electric and natural gas distribution companies, we look forward to assisting in any way we can to reduce energy burden and increase resilience for those that benefit through the Plan.

The Green Bank thanks DOH for its continued leadership, and for this opportunity to provide public comment and further strengthen our state’s ecosystem of housing supports for those most in need.

Respectfully,

A handwritten signature in black ink, appearing to read 'B. Garcia', with a long horizontal flourish extending to the right.

Bryan Garcia  
President and CEO



February 3, 2022

Commissioner Seila Mosquera-Bruno  
Connecticut Department of Housing  
505 Hudson Street  
Hartford, CT 06106

Dear Commissioner Seila Mosquera-Bruno,

On behalf of the Greater Hartford Coordinated Access Network (GH CAN), thank you for the opportunity to provide input on the Draft State of Connecticut HOME Investment Partnership Program – American Rescue Plan (HOME-ARP) Allocation Plan. We greatly appreciate the Department of Housing’s continued support in our work to make homelessness rare, brief, and non- recurring.

The Greater Hartford Coordinated Access Network has made great strides throughout the COVID 19 pandemic, including serving over 2,500 people by providing Rapid Rehousing services, outreach, diversion, and shelter conversion with approximately 4 million dollars. We have seen a reduction in the length of time people experience homelessness and the rate of returns to homelessness. In order to maintain this progress, it is imperative that we continue to invest in these services, and prioritize literally homeless individuals and families for housing services.

We support the planned activities proposed in the Draft State of Connecticut HOME Investment Partnership Program – American Rescue Plan (HOME-ARP) Allocation Plan, which includes the creation of affordable housing. However, we risk losing the momentum gained over the last two years, which may lead to an increase in the length of shelter stays, the inability to quickly rehouse families, and increased number of people becoming homeless, if other activities, such as rental assistance, Rapid Rehousing, diversion, and outreach services are not also prioritized as eligible activities in this plan. In addition, people experiencing homelessness are often not as functionally able to navigate the processes to access affordable housing as other eligible populations. 70% of individuals experiencing homelessness have one or more disabling conditions as documented in the Connecticut Homelessness Management Information System, whereas only 26% of the general population has a disability, according to the CDC. We strongly

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encourage you to prioritize people experiencing literal homelessness or setting aside a minimum number of units for them for housing and ongoing supportive services over other eligible populations. Without prioritizing the literally homeless population or setting aside a minimum number of units for them, and/or providing them with rental assistance and services, we would risk all of these units going to those who are in other eligible populations.

Thank you again for your continued support. Please feel free to contact me with any questions you may have. I can be reached by telephone at 860-808-0336 or by email, [Matt.Morgan@JourneyHomeCT.org](mailto:Matt.Morgan@JourneyHomeCT.org).

Sincerely,

Matt Morgan  
Executive Director  
Journey Home, Inc.

**255 Main Street, 2nd Floor, Hartford, CT 06106-5310**  
**Phone: 860.808.0336 • Fax: 860.461.1662**  
**[www.journeyhomect.org](http://www.journeyhomect.org)**



January 28, 2021

Commissioner Seila Mosquera-Bruno  
Connecticut Department of Housing  
505 Hudson Street  
Hartford, CT 06106

Dear Commissioner Mosquera-Bruno,

Thank you for hosting several listening sessions regarding the administration of new ARPA HOME funds in the State of Connecticut and for receiving our comments dated October 27, 2021 on how to best direct those resources. Like you, we are excited to see these resources committed to serving low-income households and helping to strengthen our communities.

We are pleased to see the focus in the DOH plan on developing non-congregate shelter and permanent affordable housing. As noted in your plan, as shelters were decompressed during the pandemic, the need to identify housing resources for individuals experiencing and at risk of homelessness has become even more critical. The DOH support and reference to that housing supporting individuals experiencing homelessness and at risk of homelessness is in alignment with the objectives of our organizations and the Reaching Home Campaign. We strongly encourage you to consider prioritizing individuals, families, and youth experiencing homelessness for housing and ongoing supportive services.

Please let us know if there is any additional information you need. We are happy to discuss these recommendations at any time.

Sincerely,

A handwritten signature in black ink, reading "Kiley A. Gosselin".

Kiley Gosselin  
Executive Director  
Partnership for Strong Communities

A handwritten signature in black ink, reading "Evonne Klein".

Evonne Klein  
CEO  
Connecticut Coalition to End Homelessness