



HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME) - AMERICAN RESCUE (ARP) ALLOCATION PLAN

**Cumberland County Community Development Department
707 Executive Place
Fayetteville, NC 28305**

Public Review and Comment Period: January 13, 2023 – January 27, 2023

Public Hearing: January 17, 2023 @ 6:45 p.m.

Cumberland County Courthouse

117 Dick Street (Room 118), Fayetteville, NC

FINAL

Amendments to the Draft and Final Reports Can Be Found at
www.cumberlandcountync.gov. Click on Community Development's Webpage

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Introduction and Background

The U.S. Department of Housing and Urban Development (HUD) through the Home Investment Partnerships (HOME) Program grant has allocated \$1,435,021 of the American Rescue Plan (ARP) Act of 2021 to Cumberland County to perform eligible activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations.

Prior to using the HOME-ARP funds, Cumberland County is required to prepare an allocation plan to outline how the funds will be used to address the needs of qualifying populations. To begin preparing the allocation plan, Cumberland County must consult with housing and service providers whose clientele include the qualifying populations to identify unmet needs and gaps in housing and service delivery systems. Feedback provided by the service providers will aid Cumberland County in determining how to best use the HOME-ARP funds to meet the needs of the qualifying populations.

ARP defines qualifying individuals or families as those that are:

- 1) homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act, as amended (42 U.S.C. 11302(a)) (“McKinney-Vento”);
- 2) at risk of homelessness, as defined in section 401 of McKinney-Vento;
- 3) fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking; and
- 4) part of other populations where providing supportive services or assistance would prevent a family’s homelessness or would serve those with the greatest risk of housing instability.

Eligible activities include:

- 1) development and support of affordable housing;
- 2) tenant-based rental assistance (TBRA);
- 3) provision of supportive services; and
- 4) acquisition and development of non-congregate shelter units.

During the development of the HOME-ARP allocation plan, Cumberland County will hold a public hearing for public review and comment at the Board of Commissioners meeting held on January 17, 2023, at 6:45 p.m. The draft copy of the allocation plan will be made available for review from January 13, 2023 – January 27, 2023 (5:00 p.m.).

For more information regarding the HOME-ARP Allocation Plan and other information, please refer to Cumberland County Community Development Department’s webpage:

https://www.cumberlandcountync.gov/departments/community-development-group/community_development/plans-reports/other-current-plans-reports

HOME-ARP Allocation Plan Template with Guidance

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

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

Consultation

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

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Template:

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

Cumberland County, through the Community Development Department, incorporated input and data from various methods and tools. In the spring of 2021, the County hired a consultant to assist the County with conducting an assessment of the needs of the homeless population, identifying available resources in the community, and preparing a three-year strategic plan with recommendations to develop goals and objectives that address the needs of the homeless community. The data from the gap analysis is incorporated into this allocation plan.

The Community Development Department developed a survey for local agencies with expertise and knowledge of the homeless community to complete. The survey was made available beginning December 16, 2022 through December 30, 2022. The deadline date was extended to January 9, 2023 to include additional input. The survey was developed using JotForm with the capability of completing the survey in both English and Spanish languages. The survey was distributed to approximately 351 representatives listed on the local Continuun of Care listserv. A public notice was published in the Fayetteville Observer on December 16, 2022 and January 8, 2023 to inform the public of the survey, dates of the public review and comment period, and the date of the public hearing. The public notice was also posted on the County's website under the Community Development Department public notices page and distributed to several locations such as the Town Halls, Headquarters Library, and the Cumberland County offices.

In addition to the survey, the Community Development Department staff held one-on-one virtual meetings with several agencies to hold detailed discussions regarding the needs of the Qualifying Population.

List the organizations consulted (December 2022 – January 2023:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Fayetteville Metropolitan Housing Authority	PHA / Section 8 Voucher Program / Project-Based / EHV Program / HUD-VASH / CoC Member	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons who are homeless followed by those fleeing from domestic violence. Families with children have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, substandard housing units, lack of accessibility for people with disabilities, lack of housing units for large families, and lack of landlord participation in rental subsidy assistance. Recommended making a minimum of 70% of the units available to the Qualifying Populations and the remaining units to all other low-income renters. Two activities that are considered high priority include tenant-based rental assistance/rental assistance to prevent homelessness and supportive services (case management, counseling, financial assistance, etc.). Additional comments included the need for transportation to get to and from work, medical facilities, employment and educational training programs, child care

			facilities, etc. for those who do not live on the bus line. Although public transportation (FAST Bus) is available it is extremely difficult for this population to reach their destination on time which often results in the loss of employment, not being seen by the doctor because they arrived late for their appointment, or child arrives too late at daycare to be accepted for the day.
Hodges Lodges, LLC and Life Matters Centers for Hope, Health, and Healing	Nonprofit / Domestic Violence Service Provider / CoC Member	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons who are homeless. Those homeless persons with chronic physical or mental health conditions requiring supportive services have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, lack of housing units for large families, lack of landlord participation in rental subsidy assistance, issues with NIMBY, lack of flexibility with program policies and processes, and lack of knowing what resources are available. Suggested making a minimum of 70% of the units available to the Qualifying Populations and the remaining units to all other low-income renters. Top two highest activities that are highest priority include development of affordable housing and supportive services (case management, counseling, financial assistance, etc.)
Care Center Family Violence Program	Public Agency / Domestic Violence Service Provider	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons fleeing from domestic violence. Families with children have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, substandard housing units, lack of funding sources to build affordable units, lack of accessibility for people with disabilities, lack of housing units for large families, lack of landlord participation in rental subsidy assistance, and economic factors. Suggested making 100% of the units available to the Qualifying Populations. Top two highest activities that are highest priority include development of affordable housing and supportive services (case management, counseling, financial assistance, etc.). Two activities

			that are considered high priorities include acquisition/development of non-congregate shelters and development of affordable housing units.
United Management II, Inc.	Landlord/Property Manager	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons fleeing from domestic violence followed by persons who are at-risk of homelessness. Families with children have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, and lack of flexibility with program policies and processes, too much red tape. Suggested making 100% of the units available to the Qualifying Populations. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and support services.
Endeavors	Nonprofit / Homeless Service Provider / CoC Member	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those who are homeless. Those persons with chronic physical or mental health conditions requiring supportive services have the highest need for housing and services. Major barriers included low supply of affordable housing units, substandard housing units, and NIMBY. Suggested making 100% of the units available to the Qualifying Populations. Activities that are highest priority include development of affordable housing units and support services.
Cumberland County Community Development / Fair Housing Specialist	Local Government / CoC Member	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are persons who are homeless. Families with children have the highest need for housing and services. Major barriers included rent increase, substandard housing units, lack of accessibility for people with disabilities, and lack of landlord participation in rental subsidy assistance. Suggested making 70% of the units available to the Qualifying Populations and the remaining available to other low-income households. Two activities that are considered high priorities include development of affordable housing units and support services.
Kingdom Community Development Corporation	Developer / CoC Member	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons at-risk of becoming homeless followed by those fleeing from domestic violence.

			<p>Families with children have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, substandard housing units, lack of funding sources to build affordable housing units, lack of housing units for large families, lack of landlord participation in rental subsidy assistance, land use policies and zoning regulations, NIMBY, and economic factors (low wage jobs, gap in education/job preparation and workplace needs). Suggested making 100% of the units available to the Qualifying Populations. Two activities that are considered high priorities include development of affordable housing units and support services. Additional comments: need for transportation. Units need to be close to public transportation. Need more TRAUMA-INFORMED counseling. Also need incentives to cover operating costs (i.e. maintenance, etc.) because rents will be very low. Operating costs would make it difficult to maintain affordable housing.</p>
Cumberland HealthNET	Nonprofit / Homeless Service Provider / CoC Member	Virtual Meeting / Survey	<p>The Qualifying Population that has the highest priority need are those persons who are homeless, followed by those fleeing from domestic violence. Those persons with two or more of the following barriers: lack of a high school diploma/GED; illiteracy; low English proficiency; or, a history of unstable employment have the highest need for housing and services. Major barriers to accessing housing include rent increase, low supply of affordable housing units, economic factors (low wage jobs, gap in education/job preparation and workplace needs), and lack of flexibility with program policies and processes, too much red tape. Suggested making 70% of the units available to the Qualifying Populations. Two activities that are considered high priorities include development of affordable housing units and acquisition/development of non-congregate shelters. Additional comments: when we are talking about</p>

			affordable housing, it must be designed for very low to no income residents and we need more funding to assist with paying rent to help stabilize this population. In addition, whatever funding is used for, there needs to be a requirement that all individuals accessing this funding must go through coordinated entry.
ServiceSource	Nonprofit / Serving People with Disabilities	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons who are homeless followed by those fleeing from domestic violence. Those with chronic physical or mental health conditions requiring supportive services have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, substandard housing units, lack of funding sources to build affordable housing units, lack of accessibility for people with disabilities, lack of housing units for large families, and economic factors (low wage jobs, gap in education/job preparation and workplace needs). Suggested making 100% of the units available to the Qualifying Populations. Two activities that are considered high priorities include development of affordable housing units and tenant-based rental assistance.
Fayetteville Area Habitat for Humanity	Nonprofit / Developer	Virtual Meeting / Survey	The Qualifying Population that has the highest priority need are those persons who are homeless followed by those at-risk of homelessness. Families with children have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, substandard housing units, lack of funding sources to build affordable housing units, lack of accessibility for people with disabilities, lack of housing units for large families, lack of landlord participation in rental subsidy assistance, NIMBY, and economic factors (low wage jobs, gap in education/job preparation and workplace needs). Suggested making 100% of the units available to the Qualifying Populations. Two activities that are considered high priorities include development of affordable housing units and acquisition/development of non-congregate shelters.

Cumberland County Health Department	Public Agency / CoC Member	Survey	The Qualifying Population that has the highest priority need are those persons who are homeless followed by those at-risk of homelessness. Families with children have the highest need for housing and services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and support services. Additional comments: Fayetteville-Cumberland County is in dire need of a centralized homeless services approach to reducing homelessness that includes local government and CoC collaboration. More oversight in distribution of HUD funds at the local level and use of evidenced based practices as recommended by HUD such as Housing First and Low Barrier approaches.
United Way of Cumberland County	Nonprofit / CoC Member	Survey	The Qualifying Population that has the highest priority need are those persons who are homeless followed by those fleeing domestic violence. Families with children have the highest need for housing and services. Two activities that are considered high priorities include tenant-based rental assistance and development of affordable housing.
Fayetteville Urban Ministry	Nonprofit / Homeless Service Provider / CoC Member	Survey	The Qualifying Population that has the highest priority need are at-risk of homelessness followed by those fleeing domestic violence. Those with chronic physical or mental health conditions requiring supportive services has have the highest need for housing and services. Two activities that are considered high priorities are the development of affordable housing and support services.
Legal Aide of North Carolina, Inc.	Legal Services Agency / CoC Member	Survey	The Qualifying Population that has the highest priority need are those persons who are homeless followed by those at-risk of homelessness. Families with children have the highest need for housing and services. Two activities that are considered high priorities include tenant-based rental assistance/rental assistance to prevent homelessness and support services. Additional comments: the development of an eviction-diversion program will benefit the City of Fayetteville/Cumberland County and would be instrumental in the reduction of homelessness in the City/County.

Cumberland County Community Collaborative	Public Agency / CoC Member	Survey	The Qualifying Population that has the highest priority need are those who are defined as homeless and those at-risk of homelessness. Families with children have the highest need for housing and services. Two activities that are considered high priorities include the development of affordable housing units and tenant-based rental assistance/rental assistance to prevent homelessness.
Fayetteville Police Department	Public Agency / CoC Member	Survey	The Qualifying Population that has the highest priority need are those who are defined as homeless and those at-risk of homelessness. Those with substance use disorders requiring supportive services have the highest need for housing and services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and support services. Additional comments: emergency immediate drop-in shelters do not currently exist in Cumberland County. When there is an urgency for immediate shelter, citizens are left sleeping in woods, doorways, park benches and along the streets. There needs to be a strategic plan to address the urgent need for immediate drop-in shelters.
Cumberland County Communicare, Inc.	Nonprofit / Mental Health / CoC Member	Survey	The Qualifying Population that has the highest priority need are those persons fleeing from domestic violence. Families with children have the highest need for housing and services. Major barriers included rent increase, low supply of affordable housing units, lack of funding sources to build affordable units, lack of housing units for large families, and other economic factors. Suggested making a minimum of 70% of the units available to the Qualifying Populations and the remaining units to all other low-income renters. Top two highest activities that are highest priority include development of affordable housing and supportive services (case management, counseling, financial assistance, etc.)
Alliance Health	Public Agency / Mental Health / CoC Member	Survey	The Qualifying Population that has the highest priority need are those at-risk of homelessness and those who are defined as homeless. Those with substance use disorders requiring supportive services have the highest need for housing and services. Two activities that are

			considered high priorities include tenant-based rental assistance to prevent homelessness and acquisition/development of non-congregate shelters.
Cumberland County EMS	Public Agency	Survey	The Qualifying Population that has the highest priority need are those who are homeless followed by those at-risk of homelessness. Those with substance use disorders requiring supportive services have the highest need for housing and services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and the development of affordable housing units.
Chacola Dream House	Nonprofit / Homeless Service Provider	Survey	The Qualifying Population that has the highest priority need are those 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 stability. The next to the highest priority are those fleeing from domestic violence. Single adults and/or two adult households (married/domestic partners/close relatives) have the highest need for housing and services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and support services.
North Carolina Community Housing & Consulting, Inc.	Nonprofit / Housing Counseling Agency	Survey	The Qualifying Population that has the highest priority need are those at-risk of homelessness followed by other population. Families with children have the highest need for housing and services. Two activities that are considered high priorities include tenant-based rental assistance/rental assistance to prevent homelessness and support services. Additional comments: the other unmet need is housing counseling to assist those qualifying clients to minimize the continued reliance on government/private assistance funds.
Better Health of Cumberland County	Nonprofit / Emergency Health Assistance / CoC Member	Survey	The Qualifying Population that has the highest priority need are those who are homeless followed by those at-risk of homelessness. Those persons with chronic physical or mental health conditions requiring supportive services have the highest need for housing and

			services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and development of affordable housing units.
DC	CoC Member	Survey	The Qualifying Population that has the highest priority need are those who are homeless followed by homeless veterans and families. Those persons with chronic physical or mental health conditions requiring supportive services have the highest need for housing and services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and development of affordable housing units.
Savannah Missionary Baptist Church	Faith-based	Survey	The Qualifying Population that has the highest priority need are those who are fleeing from domestic violence followed by those at-risk of homelessness. Families with children have the highest need for housing and services. Two activities that are considered high priorities include development of affordable housing units and tenant-based rental assistance/rental assistance to prevent homelessness.
Angela Berry Lewis Writings	Resident/Advocate	Survey	The Qualifying Population that has the highest priority need are those who are homeless followed by those at-risk of homelessness. Those persons with chronic physical or mental health conditions requiring supportive services have the highest need for housing and services. Two activities that are considered high priorities include acquisition/development of non-congregate shelters and support services.

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

Based on the feedback from the stakeholders, the top three priority needs include:

1. Development of affordable housing units
2. Acquisition / development of non-congregate shelters; and
3. Tenant-based rental assistance.

Out of the 25 respondents, 11 recommended the funds be used for the development of affordable housing units and 9 recommended funding be used for non-congregate shelter. The remaining 5 respondents recommended funding be used for tenant-based rental assistant. Several respondents

felt strongly that the development of affordable housing be complimented with supportive services that would include more transportation options, housing counseling, and case management (short-term and long-term).

Regarding the type of populations to be served, the majority indicated the population with the highest needs are the following ranked from highest priority to lowest:

1. Families with children;
2. Those persons with chronic physical or mental health;
3. Those with substance use disorder;
4. Single adults and/or two adult households; and
5. Those persons with two or more of the following barriers: lack of a high school diploma/GED; illiteracy; low English proficiency; or, a history of unstable employment has the highest need for housing and services.

Public Participation

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

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

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

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

Template:

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

- *Date(s) of public notice:* 12/16/2022 and 1/8/2023

- **Public comment period:** start date - 1/13/2023 end date - 1/27/2023
- **Date(s) of public hearing:** 1/17/2023

Describe the public participation process:

At the December 14, 2022 CoC meeting, Community Development staff announced to the members that the HOME-ARP consultation survey was made available for homeless providers and other stakeholders to complete and provide input on how to best use the HOME-ARP funds. The public notice was published in the Fayetteville Observer on December 16, 2022 and on again on January 8, 2023 to describe the HOME-ARP grant, amount, survey, allocation plan process, dates of the public hearing and the public review and comment period.

Out of the twenty-five (25) respondents, Community Development staff held one-on-one virtual meetings with eight (8) respondents and the remaining respondents completed the survey only. The survey consisted of approximately 17 questions of which 10 were directly related to HOME-ARP program implementation, priorities, and preferences.

Describe efforts to broaden public participation:

The survey was distributed to all CoC members that included homeless providers, Fayetteville Metropolitan Housing Authority, developers, and other agencies and advocates of the homeless community. In total, the survey was issued to 351 emails included in the CoC listserv. The HOME-ARP Allocation Plan is made available on the Cumberland County Community Development website and will be available at several locations to include the Community Development office, Eastover Town Hall, Falcon Town Hall, Godwin Town Hall, Hope Mills Town Hall, Linden Town Hall, Spring Lake Town Hall, Stedman Town Hall, Wade Town Hall, Headquarters Library, and at the County Board of Commissioners office.

At the CoC Board meeting held on January 24, 2023, Community Development Staff provided a brief summary of the draft HOME-ARP Allocation Plan to 25 attendees.

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

Community Development received no comments.

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

Not applicable.

Needs Assessment and Gaps Analysis

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

Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Template:

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Famili y HH (at least 1 child)	Adult HH (w/o child)	Vets	Victim s of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	14	3	14	14	0								
Transitional Housing	40	12	0	0	0								
Permanent Supportive Housing	121	38	137	132	0								
Other Permanent Housing	0	0	7	7	0								
Sheltered Homeless						54	14	1	7				
Unsheltered Homeless						5	387	19	13				
Current Gap										-	-	373	373

Sources: 1) 2022 Point in Time Count (PIT); 2) 2022 Continuum of Care Housing Inventory Count (HIC); 3) Consultation

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	61,805		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	11,535		
Rental Units Affordable to HH at 50% AMI (Other Populations)	9,660		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		8,750	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		8,635	
Current Gaps			17,385

Source: 2015-2019 Comprehensive Housing Affordability Strategy (CHAS)

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

Homeless as defined in 24 CFR 91.5

A homeless person is defined as:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - (i) 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;
 - (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, [transitional housing](#), and hotels and motels paid for by charitable organizations or by federal, [state](#), or local government programs for low-income individuals); or
 - (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an [emergency shelter](#) or place not [meant](#) for human habitation immediately before entering that institution;
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:

- (i) The primary nighttime residence will be lost within 14 days of the date of application for [homeless](#) assistance;
 - (ii) No subsequent residence has been identified; and
 - (iii) The individual or family lacks the resources or support networks, [e.g.](#), family, friends, faith-based or other social networks needed to obtain other permanent housing;
- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as [homeless](#) under this definition, but who:
- (i) Are defined as [homeless](#) under section 387 of the [Runaway and Homeless Youth Act \(42 U.S.C. 5732a\)](#), section 637 of the [Head Start Act \(42 U.S.C. 9832\)](#), section 41403 of the [Violence Against Women Act of 1994 \(42 U.S.C. 14043e-2\)](#), section 330(h) of the [Public Health Service Act \(42 U.S.C. 254b\(h\)\)](#), section 3 of the [Food and Nutrition Act of 2008 \(7 U.S.C. 2012\)](#), section 17(b) of the [Child Nutrition Act of 1966 \(42 U.S.C. 1786\(b\)\)](#), or section 725 of the [McKinney-Vento Homeless Assistance Act \(42 U.S.C. 11434a\)](#);
 - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for [homeless](#) assistance;
 - (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for [homeless](#) assistance; and
 - (iv) 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 (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
- (4) Any individual or family who:
- (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - (ii) Has no other residence; and

- (iii) Lacks the resources or support networks, [e.g.](#), family, friends, faith-based or other social networks, to obtain other permanent housing.

According to the 2022 Point-in-Time Homeless Count conducted for the Fayetteville / Cumberland County area, the report estimates 475 persons who are homeless. This number include those persons who were in an emergency shelter, transitional housing, or unsheltered. Of the 475 reported, 307 persons are males and 168 are females. The racial demographics and ages are as follows:

Race	Total = 475
American Indian, Alaska Native, or Indigenous	21
Asian or Asian American	10
Black, African American, or African	279
Native Hawaiian or Pacific Islander	6
White	99
Multiple Races	60

Age Group	Total = 475
Under age 18	30
Ages 18 to 24	1
Over age 24	444

At Risk of Homelessness as defined in 24 CFR 91.5

At risk of homelessness is defined as:

(1) An individual or family who:

- (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- (ii) Does not have sufficient resources or support networks, [e.g.](#), family, friends, faith-based or other social networks, immediately [available](#) to prevent them from moving to an [emergency shelter](#) or another place described in paragraph (1) of the “Homeless” definition in this section; and
- (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, [State](#), or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved [consolidated plan](#);

According to the 2015-2019 CHAS data, Cumberland County has 61,805 renters. Out this number, approximately 20,230 (33%) of renters are cost burdened. Cost burdened is the ratio of housing costs to household income. The housing cost includes the contract rent plus utilities. Out of the 20,230 renters that are cost burdened, 11,535 households have incomes that are less than or equal to 30% of the area median income. Of this number, 7,855 are cost burdened and are paying over 50% of their income toward housing costs (contract rent plus utilities). Of those households with incomes between 31% and 50% of the area median income, 4,830 renters are cost burdened and paying over 50% of their income toward housing costs.

According to the North Carolina Housing Coalition, the agency reported in the 2021 Housing Need for Cumberland County that out of 45,610 households, 36% of the households are cost burdened. Renters make up 29,912 (48%) households and have reported having difficulty affording their homes. The income that is needed to afford a two-bedroom apartment is \$34,760.

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

The Care Center Family Violence Program serves as one of the main programs available for victims of domestic violence. However, during the 2022 Point-in-Time Homeless Count, the program reported only having a capacity of 8 beds. The number of units varies based upon the household composition.

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

The populations requiring services or housing assistance include populations already mentioned above. In addition to short-term or long-term rental assistance or utility assistance, these populations need additional support services to help them maintain housing stability. The main support services include long-term case management, transportation, housing counseling, and mental health services.

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

Cumberland County manages the Robin's Meadow transitional housing program which targets homeless families with children. The program provides 12 units and approximately 36 beds for homeless families with children. Cumberland County used Community Development Block Grant funds and local general funds to provide additional support to the program. This program, with the partnership of Coordinated Entry (managed by Cumberland HealthNET) and shelters, allow families who are homeless to reside in an apartment for up to 12 months while they receive case management services and apply for permanent housing.

Cumberland County, in partnership with Cumberland Interfaith Hospitality Network, manages the Safe Homes for New Beginnings program which provides permanent supportive housing program (5 units) for individuals who have substance abuse disorders and are literally homeless. This program designates 60% of its beds for chronically homeless individuals.

Cumberland County, in partnership with the City of Fayetteville, used local general funds to provide housing assistance and other supportive services to promote housing stability by avoiding evictions and foreclosure to individuals that are at or below the eighty percentile of the Area Median Income preventing individuals and families of becoming homeless or may become homeless again. Program participants are able to receive financial assistance for security deposits, rental and/or utility assistance, hotel/motel assistance, and other support services needed to obtain and maintain permanent housing.

Bonanza (managed by Endeavors) is a permanent supportive housing program (7 units) which targets individuals and families who are homeless with a disability. Leath Commons (managed by Cumberland Interfaith Hospitality Network) serves as a permanent supportive housing program (5 units/10 beds) for families who are homeless and have a disability.

Volunteers of America, through the Supportive Services for Veteran Families Program, offers a permanent housing program that provides short-term/medium-term financial assistance to

veterans and their families. The Fayetteville Metropolitan Housing Authority (FMHA) in partnership with the Fayetteville Veteran Affairs Medical Center, provides HUD-VASH vouchers to eligible homeless veterans.

The Salvation Army continues to operate a homeless shelter that targets mostly single adults. The shelter has a two to three units designated for families with children. The shelter has a capacity of 44 beds.

The Care Center Family Violence Program manages a shelter with the capacity of approximately 8 beds that target victims of domestic violence.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Based on current data and available resources, there is a need for emergency shelter beds that target families with children. Although, the PiT Count only reported 51 sheltered and unsheltered persons within a household with at least one adult and one child, this is not an accurate representation of the number of families with children who are homeless. The number of shelter beds available for families with children are limited to approximately 14 beds. Out of the 51 sheltered beds reported, 36 were occupied by persons within a transitional housing program which allows families to reside in the units for up to 12 months. Homeless families with children in need of shelter are unable to access shelter due to the limited number of emergency shelter beds and the long wait period for transitional housing and permanent housing beds. The homeless families are then forced to stay in an over-crowded unit with family or friends or other places where they are not easily found.

At Risk of Homelessness as defined in 24 CFR 91.5

Those persons at-risk of homelessness struggle to maintain housing stability due to several factors. Some of the barriers to accessing affordable housing and maintaining housing stability include:

1. Significant increase in rent, especially within the last two years;
2. Inadequate supply of affordable housing units;
3. Substandard housing units;
4. Lack of funding sources to develop more affordable housing units;
5. Lack of ADA compliant units for people with disabilities;
6. lack of affordable housing units for large families of five or more persons;
7. Lack of landlord participation in rental subsidy assistance;
8. Not in My Back Yard (NIMBY); and

9. Other economic factors to include low wage jobs, gap in education/job preparation and workplace needs.

According to NC 2-1-1 Counts, between January 1, 2022 to December 31, 2022, there were 11,985 requests for housing and services. Of those requests, at least 44.4% were for housing and shelter requests. Of the percentage of housing and shelter requests, at least 31.9% were for shelter requests, 24.2% were for low-cost housing requests, 39.3% were for rent assistance, and the remaining were for other housing related requests.

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

According to the North Carolina Council for Women and Youth Involvement statistics for the 2020-2021 year, there were 300 calls made to an agency's hotline serving the Cumberland County area. There were 420 clients served. Currently, there are only 8 beds designated for victims of domestic violence in Cumberland County. Victims of domestic violence or human trafficking do not always have access to emergency shelter beds or housing. Many victims and survivors lack income and resources to access housing on their own and usually need financial assistance, long-term case management, counseling, legal services, transportation, and other support services to obtain and maintain housing.

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

The other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability have the same unmet needs as those populations already mentioned earlier.

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

A deficit in shelter beds for single adults also still exists. According to the 2022 PiT Count, out of the 424 homeless persons without children, 387 persons were unsheltered on the night of the PiT Count. That same night, the local homeless shelter had 20 beds occupied. This was the only shelter available to provide beds to the general homeless population.

The Coordinated Entry System is over-whelmed with inquiries for shelter, housing, and services with very limited resources to refer applicants to.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-

ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Cumberland County Community Development Department normally give preference to activities and projects that target populations with income at or below 30% or 50% of the area median income. Cumberland County Community Development Department will not further identify characteristics of other populations.

Identify priority needs for qualifying populations:

Based on the feedback received from the stakeholders, respondents ranked the following activities in order beginning with the highest priority to lowest priority:

1. Development of affordable housing units
2. Acquisition / development of non-congregate shelters; and
3. Tenant-based rental assistance.

Those recommending the development of affordable housing units felt strongly that this activity should be complimented with supportive services that would include more transportation options, housing counseling, and case management (short-term and long-term).

Recommendations for the development of non-congregate shelter ranked high followed by the need for tenant-based rental assistance.

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

Quantitative and qualitative data was obtained from the 2015-2019 CHAS, 2022 Point-in-Time Homeless Count, 2022 Housing Inventory Chart, Gaps Analysis report prepared in 2021 by OrgCode Consulting, and feedback obtained from the stakeholder survey. The data was used to prepare an updated assessment of the needs and priorities related to shelter and housing service delivery systems that exist in Cumberland County.

HOME-ARP Activities

Template:

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

Cumberland County Community Development Department will issue a Request for Applications (RFA) or Request for Proposals (RFP) to solicit entities interested in the development and / or management of the activity(ies). The selection committee will review all proposals received through the RFA/RFP process. The criteria used to review proposals normally consist of reviewing eligibility, capacity, experience, financial feasibility, project readiness, leveraging, and other criteria.

Describe whether the PJ will administer eligible activities directly:

Cumberland County Community Development Department expects to administer most of the activities directly and will subcontract portions involving construction activities.

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

Cumberland County Community Development has not used any HOME-ARP funds prior to HUD's acceptance of the HOME-ARP allocation plan.

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

Template:

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 100,000		
Acquisition and Development of Non-Congregate Shelters	\$ 0		
Tenant Based Rental Assistance (TBRA)	\$ 0		
Development of Affordable Rental Housing	\$ 1,263,270		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 71,751	10 %	15%
Total HOME ARP Allocation	\$ 0		

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

The development of affordable housing was the top priority need based on feedback from stakeholders. Therefore, the County will utilize \$1,263,270 (88%) for development of affordable rental housing, \$100,000 (7%) for supportive services, and \$71,751 (5%) for administrative and planning.

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

Based on current inventory, there is a great need for affordable housing. Non-congregate shelter was another high priority indicated by the respondents. Although non-congregate shelter was another top priority need, the use of other funding sources to acquire and develop non-congregate shelter would allow more flexibility in the use of the shelter. Supportive services, especially case management, is necessary for program participants to successfully achieve self-sufficiency throughout the program. It is important to ensure program participants are able to access much needed services while in housing, to include but are not limited to:

- Mental Health Services
- Transportation
- Employment Opportunities and Job Training
- Health Services
- Childcare services

Administration and planning costs include program oversight, monitoring, coordination, and evaluation.

HOME-ARP Production Housing Goals

Template

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

The number of housing units will depend on the amount of other funding sources used by the developer to leverage the total project costs. Cumberland County Community Development Department gives preference to those developers that use their own funding sources to leverage the County's funds to maximize the number of housing units. Most developers the County partners with are able to access additional funding made available through the Low-Income

Housing Tax Credit (LIHTC) program. The goal of the County will be to support at least 25 affordable housing units through these funds and other funding resources.

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

It is the desire of Cumberland County to meet the needs of all Qualifying Populations but in particular those who are considered hardest to house (chronic homeless, households with incomes below 30% of the AMI, disabled, etc.)

Preferences

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

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

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

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

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

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.**

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

Template:

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:
Cumberland County plans to target all Qualifying Populations. No preference has been identified.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:
No preference has been identified.

Referral Methods

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

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

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

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

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

Template:

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):
Not applicable.

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

process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

Not applicable.

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

Not applicable.

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

Not applicable.

Limitations in a HOME-ARP rental housing or NCS project

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

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD's Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.
- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

Template

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

Cumberland County does not intend to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population.

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

Not applicable.

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

Not applicable.

HOME-ARP Refinancing Guidelines

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

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

Not Applicable. Cumberland County 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.

- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***

Not Applicable.

- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
Not Applicable.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
Not Applicable.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
Not Applicable.
- ***Other requirements in the PJ's guidelines, if applicable:***
Not Applicable.

Appendices

- SF 424s and Certifications
- Public Notice of Public Hearing and Comment and Review Period
- HOME-ARP Consultation Survey
- Stakeholders Survey Results
- Gap Analysis Report

Application for Federal Assistance SF-424

*** 1. Type of Submission:**

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

*** 2. Type of Application:**

- ☒ New
☐ Continuation
☐ Revision

*** If Revision, select appropriate letter(s):**

*** Other (Specify):**

*** 3. Date Received:**

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

Cumberland County

*** b. Employer/Taxpayer Identification Number (EIN/TIN):**

56-6000291

*** c. UEI:**

TGNWYV8122G3

d. Address:

*** Street1:**

707 Executive Place

Street2:

*** City:**

Fayetteville

County/Parish:

*** State:**

NC: North Carolina

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

28305-0009

e. Organizational Unit:

Department Name:

Community Development Dept.

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

*** First Name:**

Delores

Middle Name:

*** Last Name:**

Taylor

Suffix:

Title:

Director of Community Development

Organizational Affiliation:

Cumberland County

*** Telephone Number:**

910-323-6112

Fax Number:

910-323-6114

*** Email:**

dtaylor@co.cumberland.nc.us

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

B: County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

Home Investment Partnerships Program through the American Rescue Plan (HOME-ARP)

*** 12. Funding Opportunity Number:**

Entitlement

* Title:

N/A

13. Competition Identification Number:

Title:

N/A

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

The HOME-ARP grant will be used to provide housing, shelter, tenant-based rental assistance, and/or supportive services to homeless persons and other vulnerable populations in Cumberland County.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424**16. Congressional Districts Of:*** a. Applicant * b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:* a. Start Date: * b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="1,435,021.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="1,435,021.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

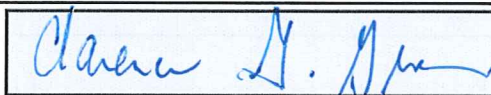
Middle Name:

* Last Name:

Suffix:

* Title: * Telephone Number: Fax Number: * Email:

* Signature of Authorized Representative:

* Date Signed:

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.

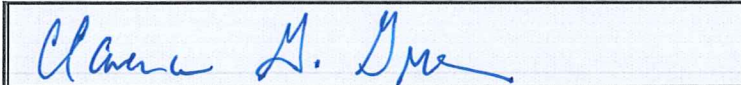
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee- 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
19. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE County Manager
APPLICANT ORGANIZATION Cumberland County	DATE SUBMITTED 3/24/23

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

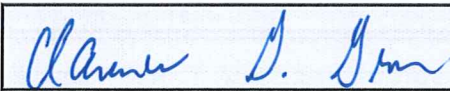
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
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14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
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18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	County Manager
APPLICANT ORGANIZATION	DATE SUBMITTED
Cumberland County	3/24/23

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

Uniform Relocation Act and Anti-displacement and Relocation Plan --It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

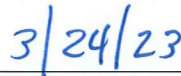
Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

Section 3 --It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 75.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.



Signature of Authorized Official



Date

County Manager

Title

**PUBLIC NOTICE
FOR THE COUNTY OF
CUMBERLAND
PREPARATION OF HOME
INVESTMENT
PARTNERSHIPS
PROGRAM (HOME) -
AMERICAN RESCUE
PLAN (ARP) ACT OF 2021
ALLOCATION PLAN**

The U.S. Department of Housing and Urban Development (HUD) through the Home Investment Partnerships (HOME) Program grant has allocated \$1,435,021 of the American Rescue Plan (ARP) Act of 2021 funds to Cumberland County to perform eligible activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. Prior to using the HOME-ARP funds, Cumberland County is required to prepare an allocation plan to outline how the funds will be used to address the needs of qualifying populations. To begin preparing the allocation plan, Cumberland County must consult with housing and service providers whose clientele include the qualifying populations to identify unmet needs and gaps in housing and service delivery systems. Feedback provided by the service providers and citizens will aide Cumberland County in determining how to best use the HOME-ARP funds to meet the needs of the qualifying populations. During the development of the HOME-ARP allocation plan, Cumberland County will hold a public hearing for public review and comment at the Board of Commissioners meeting held on January 17, 2023, at 6:45 p.m. The draft copy of the allocation plan will be made available



Public Notices

for public review and comment from January 13, 2022 – January 27, 2022 (5:00 p.m.).

The survey can be completed and submitted by accessing the link on the Cumberland County Community Development's webpage. To access the survey and additional information regarding the HOME-ARP funds, please refer to the link below:

Website:

<https://www.cumberlandcountync.gov/departments/community-development-group/community-development/public-notices--citizen-participation/activities-events>.

The survey and other documents may also be accessed by visiting Cumberland County Community Development Department's office at 707 Executive Place, Fayetteville.

ACCESSIBILITY TO MEETINGS AND DOCUMENTS

CCCD is committed to providing equal access to its facilities, programs and services for persons with disabilities by holding all meetings in locations that are handicapped accessible. Individuals requesting any form of reasonable accommodations for public meetings/hearings should do so five (5) business days prior to the advertised meeting. However, if a request is made within the five (5) business days, every reasonable effort will be made to accommodate the request.

For more information, please contact the Cumberland County Community Development Department at 910-323-6112.

**PUBLIC NOTICE
FOR THE COUNTY OF
CUMBERLAND
PREPARATION OF HOME
INVESTMENT
PARTNERSHIPS
PROGRAM (HOME) –
AMERICAN RESCUE
PLAN (ARP) ACT OF 2021
ALLOCATION PLAN**

The U.S. Department of Housing and Urban Development (HUD) through the Home Investment Partnerships (HOME) Program grant has allocated \$1,435,021 of the American Rescue Plan (ARP) Act of 2021 funds to Cumberland County to perform eligible activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations. Prior to using the HOME-ARP funds, Cumberland County is required to prepare an allocation plan to outline how the funds will be used to address the needs of qualifying populations. To begin preparing the allocation plan, Cumberland County must consult with housing and service providers whose clientele



Public Notices

includes the qualifying populations to identify unmet needs and gaps in housing and service delivery systems. Feedback provided by the service providers and citizens will aid Cumberland County in determining how to best use the HOME-ARP funds to meet the needs of the qualifying populations.

During the development of the HOME-ARP allocation plan, Cumberland County will hold a public hearing for public review and comment at the Board of Commissioners meeting held on January 17, 2023, at 6:45 p.m. The draft copy of the allocation plan will be made available for public review and comment from January 13, 2023 – January 27, 2023 (5:00 p.m.) at

<https://www.cumberlandcountync.gov/departments/community-development-group/community-development/plans-reports/other-current-plans-reports>.

A hard copy of the documents may also be accessed by visiting Cumberland County Community Development Department's office at 707 Executive Place, Fayetteville. For additional information regarding the HOME-ARP funds, please refer to the Cumberland County Community Development Department webpage and HUD's website.

ACCESSIBILITY TO MEETINGS AND DOCUMENTS
CCCD is committed to

providing equal access to its facilities, programs, and services for persons with disabilities by holding all meetings in locations that are handicapped-accessible. Individuals requesting any form of reasonable accommodations for public meetings/hearings should do so five (5) business days prior to the advertised meeting. However, if a request is made within five (5) business days, every reasonable effort will be made to accommodate the request.

For more information, please contact the Cumberland County Community Development Department at 910-323-6112.

January 8, 2022 8281876

[Home Page](#) > [Departments](#) > [Community Development](#) > [Plans & Reports](#) > [Other Current Plans & Reports](#)

Other Current Plans & Reports

PUBLIC NOTICE

FOR THE COUNTY OF CUMBERLAND

PREPARATION OF HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME) – AMERICAN RESCUE PLAN (ARP) ACT OF 2021 ALLOCATION PLAN

The U.S. Department of Housing and Urban Development (HUD) through the Home Investment Partnerships (HOME) Program grant has allocated \$1,435,021 of the American Rescue Plan (ARP) Act of 2021 funds to Cumberland County to perform eligible activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations.

Prior to using the HOME-ARP funds, Cumberland County is required to prepare an allocation plan to outline how the funds will be used to address the needs of Qualifying Populations. To begin preparing the allocation plan, Cumberland County must consult with housing and service providers whose clientele include the Qualifying Populations to identify unmet needs and gaps in housing and service delivery systems. Feedback provided by the service providers and citizens will aide Cumberland County in determining how to best use the HOME-ARP funds to meet the needs of the Qualifying Populations.

During the development of the HOME-ARP allocation plan, Cumberland County will hold a public hearing for public review and comment at the Board of Commissioners meeting held on January 17, 2023, at 6:45 p.m. The draft copy of the allocation plan will be made available for public review and comment from January 13, 2023 – January 27, 2023 (5:00 p.m.).

The survey can be completed and submitted by accessing the link below:

Link: <https://form.jotform.com/223486306823054>

For additional information regarding the HOME-ARP funds, please refer to the Cumberland County Community Development Department webpage and HUD's website.

The survey will be available until December 30, 2022. A hard copy of the survey and other documents may also be accessed by visiting Cumberland County Community Development Department's office at 707 Executive Place, Fayetteville.

ACCESSIBILITY TO MEETINGS AND DOCUMENTS


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For more information, please contact the Cumberland County Community Development Department at 910-323-6112.

Other Reports

- [Final - Fayetteville-Cumberland County 2020 Analysis of Impediments to Fair Housing Choice \(10/2020\)](#)
- [2018 Point-in-Time Annual Report Final \[Posted: 6/20/2018\]](#)
- [Fayetteville/Cumberland County 2017 Point-in-Time Count \[05/23/2017\]](#)
- [Housing Market Analysis](#)

Contact Us

Phone: 910-323-6112
Fax: 910-323-6114
TTY Phone: 910-223-9386
Email: 
Director: Dee Taylor

Address:
707 Executive Place
Fayetteville, NC 28305

Cumberland County Government
Judge E. Maurice Braswell Courthouse
117 Dick Street
Fayetteville, NC 28301

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[Events Calendar](#)
[Employees/Retirees](#)
[ADA Compliance](#)



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HOME-ARP Stakeholder Survey

Cumberland County Community Development Department

The U.S. Department of Housing and Urban Development (HUD) through the Home Investment Partnerships (HOME) Program grant has allocated \$1,435,021 of the American Rescue Plan (ARP) Act of 2021 funds to Cumberland County to perform eligible activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or in other vulnerable populations.

Prior to using the HOME-ARP funds, Cumberland County must consult with housing and service providers whose clientele include the Qualifying Populations to identify unmet needs and gaps in housing and service delivery systems. Feedback provided by the service providers and citizens will aide Cumberland County in determining how to best use the HOME-ARP funds to meet the needs of the qualifying populations.

To learn more about the Qualifying Populations, eligible activities, and other information about the HOME-ARP program, please refer to [Cumberland County Community Development Webpage](#) and / or [HUD's website](#).

1. Please rank the Qualifying Populations below beginning with the population you believe should have the highest priority. Please place your mouse over the item and drag the selection to the appropriate ranking level. Note: the selected items will be re-ranked in ascending order.

- 1: Homeless, as defined in section 103(a) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302(a));
- 2: At-risk of homelessness, as defined in section 401(1) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(1));
- 3: Fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, as defined by the Secretary;
- 4: 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;
- 5: Veterans and families that include a veteran family member that meet one of the

2. Select the supportive services your organization currently offers to the Qualifying Populations:

- ☐ Case Management
- ☐ Legal Services
- ☐ Moving Cost Assistance
- ☐ Employment Assistance
- ☐ Educational Assistance
- ☐ Development of Affordable Housing
- ☐ Rental Assistance (Short-Term/Medium-Term)
- ☐ Emergency Shelter for Homeless Persons
- ☐ Tenant Based Rental Assistance
- ☐ Acquisition / Development of Non-Congregate Units (i.e., Emergency Shelter Providing Individual Rooms Other than a Traditional Homeless Shelter)
- ☐ Not Applicable
- ☐ Other

3. Please select from the list below, the special population you believe has the highest need for housing and services.

- ☐ Single adults and/or two adult households (married/domestic partners/close relatives)
- ☐ Families with children and youth
- ☐ Individuals/family members with a permanent disability that limits housing options
- ☐ Those with chronic physical or mental health conditions requiring supportive services
- ☐ Those with substance use disorders requiring supportive services
- ☐ Those with histories of domestic violence abuse
- ☐ Those with two or more of the following barriers: lack of a high school diploma/GED; illiteracy; low English proficiency; or, a history of unstable employment

4. Please rank the following activities beginning with the activity you believe should have the highest priority. Please place your mouse over the item and drag the selection to the appropriate ranking level. Note: the selected items will be re-ranked in ascending order.

- 1: Development of affordable housing units (including rehab of existing units)
- 2: Tenant-based rental assistance / Rental assistance to prevent homelessness
- 3: Acquisition/development of non-congregate shelters (shelter consisting of private rooms for individuals or families)
- 4: Support Services: homeless prevention, housing counseling, financial assistance, case management

5. What do you see as major barriers to affordable housing? Please select all that is applicable.

- ☐ Acceleration in rent
- ☐ Low supply of affordable housing units
- ☐ Substandard housing units
- ☐ Lack of funding sources to build affordable units
- ☐ Lack of accessibility for people with disabilities
- ☐ Lack of housing units for large families (of 5 or more people)
- ☐ Lack of landlord participation in rental subsidy assistance
- ☐ Land use policies and zoning regulations
- ☐ Not in my backyard (NIMBY)
- ☐ Economic factors (low wage jobs, gap in education/job preparation and workplace needs)
- ☐ Lack of flexibility with program policies and process, too much red tape
- ☐ Other

6. If HOME-ARP funds were used for development of new affordable housing units, would you prefer the option of all units being made available to all of the Qualifying Populations, or making at least 70% available to the Qualifying Populations and making the remaining units available for the rest of the low-to-moderate-income renters?

- ☐ Make all units available to Qualifying Populations
- ☐ Make a minimum of 70% available to the Qualifying Populations and the rest available to other renters of all income levels

7. If HOME-ARP funds were used for tenant-based rental assistance, what type of assistance do you believe should be provided. Please select all that is applicable.

- ☐ Security Deposit
- ☐ Rental Assistance
- ☐ Utility Deposit
- ☐ Utility Payment
- ☐ Other

8. If HOME-ARP funds were used for non-congregate shelter, what do you believe is the area of greatest need for shelter facilities?

- ☐ Costs for increasing EXISTING shelter capacity and operations
- ☐ Costs for the development of NEW shelter facilities
- ☐ Costs associated with increasing access to supportive services
- ☐ Shelter operating costs
- ☐ Administration and planning costs for shelter facilities

9. If HOME-ARP funds were used for providing supportive services, what are the top three services you believe should have the highest priority? Please select up to three services.

- ☐ Housing Counseling (i.e. landlord/tenant rights, housing search, budgeting, credit education/repair, etc (does not include first time home buyer / foreclosure counseling))
- ☐ Mental Health Services
- ☐ Substance Abuse Treatment Services
- ☐ Engagement / Outreach
- ☐ Homelessness Prevention Services
- ☐ Health Services
- ☐ Transportation Services
- ☐ Job Readiness / Employment Assistance
- ☐ Life Skills Training
- ☐ Case Management Services
- ☐ Child Care
- ☐ Legal Services

10. Are there any additional unmet needs / services you see among the Qualifying Populations, or any additional remarks you wish to add?

11. Which type of organization best describes your group or affiliation?

- ☐ Homeless Service Provider - Emergency or Temporary Shelter/housing
- ☐ Homeless Service Provider - Rapid Rehousing or Permanent Supportive Housing
- ☐ Public Housing Authority
- ☐ Domestic Violence Service Provider
- ☐ Veteran Affairs / Veteran's Group
- ☐ Human Relations / Fair Housing / Civil Rights Organization
- ☐ Organization Serving People with Disabilities
- ☐ Organization Serving People Living with HIV/AIDS
- ☐ Other Public Agency (i.e. Local Government, etc.)
- ☐ Continuum of Care
- ☐ Landlord / Property Manager
- ☐ Developer
- ☐ Resident / Advocate
- ☐ Other

12. How long has your organization been operating in the Fayetteville/Cumberland County area?

13. If representing an organization, what is your organization's mission statement or focus area?

14. Name of Person Completing Survey:

15. Name of Organization (If Applicable)

16. Email Address:

17. Telephone Number:

Submit

HOME INVESTMENT PARTNERSHIPS PROGRAM (HOME) – AMERICAN RESCUE PLAN (ARP)

ALLOCATION PLAN

Presented by:
Cumberland County Community Development Department
707 Executive Place
Fayetteville, NC 28305

Board of Commissioners Meeting
Public Hearing: January 17, 2023 @ 6:45 p.m.

Background

- HUD allocated \$1,435,021 of HOME-ARP funds to Cumberland County
- Prior to using funds, must prepare and submit an Allocation Plan
- Must consult with:
 - Homeless Providers
 - Domestic Violence Service Providers
 - Public Housing Agencies
 - CoC
 - Other Public and Private Agencies that serve the Qualifying Populations
- A Public Hearing must be held
- 2021 Annual Action Plan must be amended
- Allocation Plan must be submitted to HUD for Approval

Qualifying Populations

Homeless

At-Risk of
Homelessness

Fleeing from
Domestic
Violence...

Other
Populations

Eligible Activities

Development of
Affordable Housing

Tenant-Based
Rental Assistance
(TBRA)

Provision of
Supportive
Services

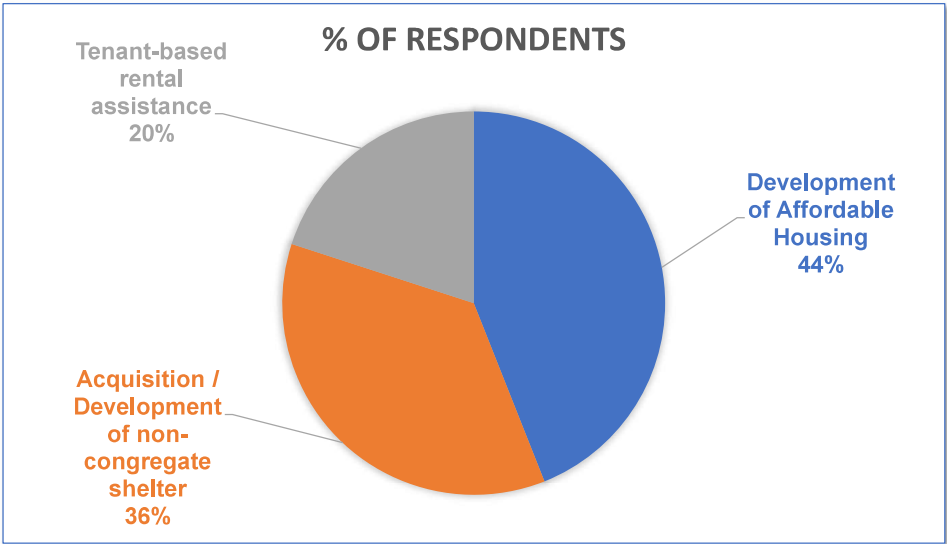
Acquisition and
Development of
non-congregate
shelter units

Assessment of Needs / Consultation

- Survey was utilized to obtain feedback
 - Discussions on how funds should be used, priority needs, Qualifying Populations
- Received 25 responses
- Held one-on-one virtual meetings with 10 providers
- Gap Analysis Report (2021) prepared by OrgCode Consulting was used
- Recent HUD CHAS data was used
- 2022 Point-in-Time Homeless Count / Housing Inventory Chart
- Other Information

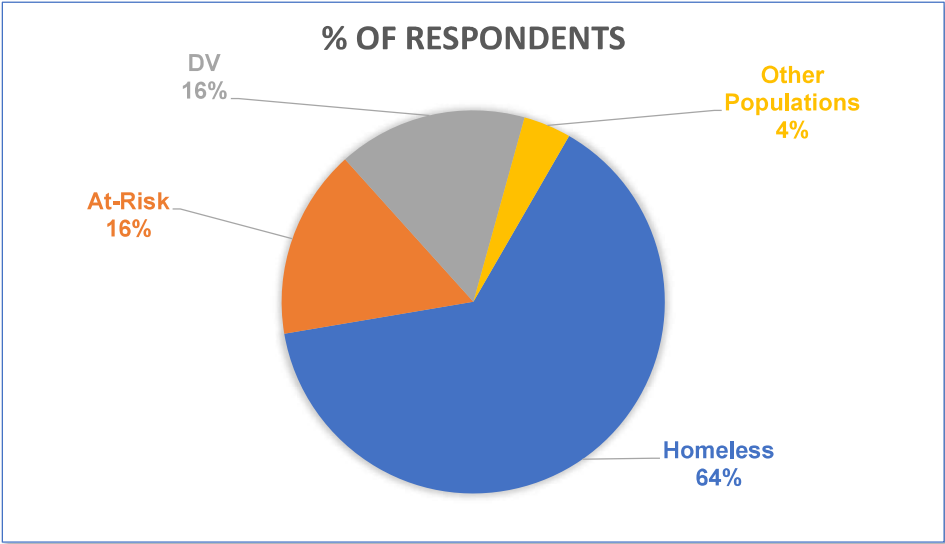
Feedback

Activities considered as high priority



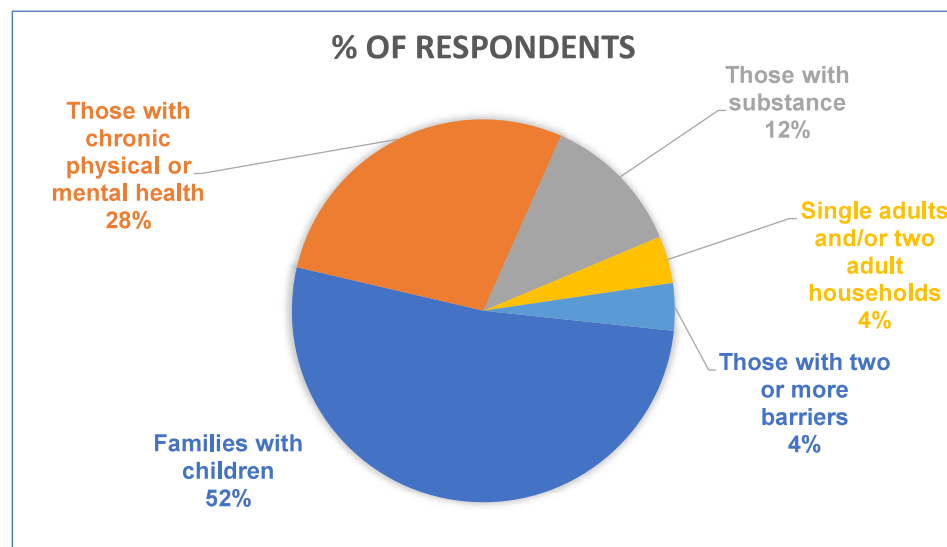
Feedback (Cont'd)

Qualifying Populations considered as high priority



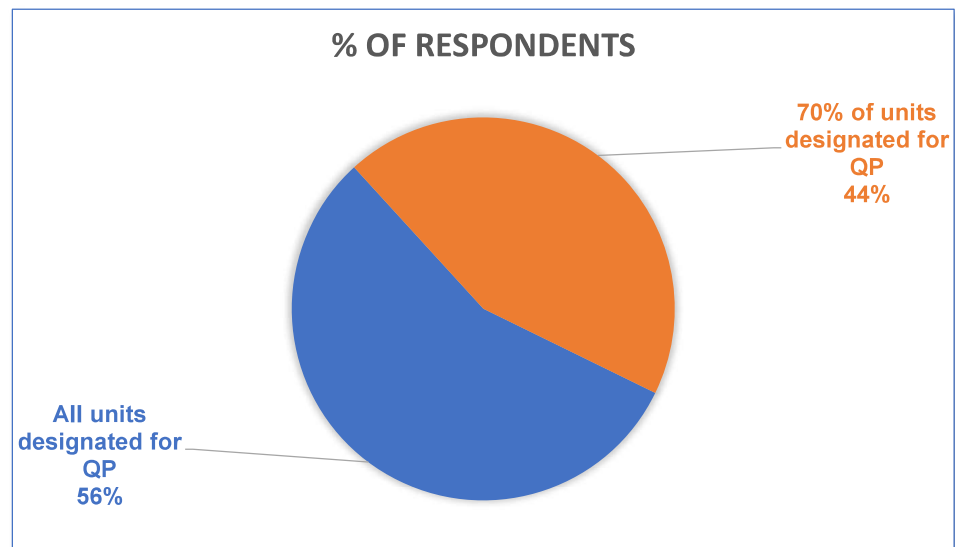
Feedback (Cont'd)

Population types considered as high priority



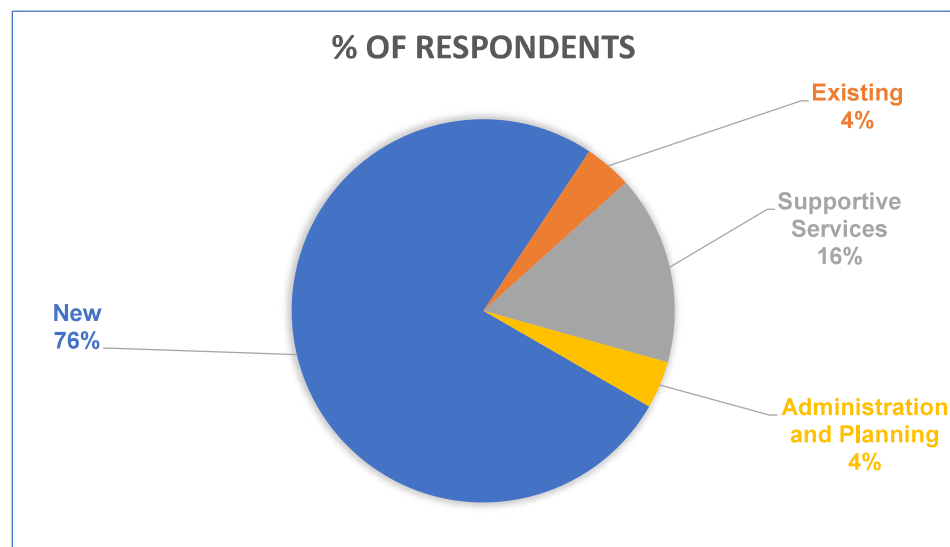
Feedback (Cont'd)

Percentage of units designated for Qualifying Populations



Feedback (Cont'd)

Should Funds be used for New or Existing Non-Congregate Shelter



Project
Name

2022 Point-in-Time Homeless Count

N = 475

Persons in Households without Children (Total = 424)	
Female	136
Male	288

Ages 18 - 24	0
Ages 24 and Over	424

Non-Hispanic	404
Hispanic	20

American Indian, Alaska Native, or Indigenous	11
Asian or Asian American	10
Black, African American, or African	246
Native Hawaiian or Pacific Islander	4
White	96
Multiple Races	57

Persons in Households with Children (Total = 51)	
Female	32
Male	19

Under age 18	30
Ages 18 - 24	1
Ages 24 and Over	20

Non-Hispanic	51
Hispanic	0

American Indian, Alaska Native, or Indigenous	10
Asian or Asian American	0
Black, African American, or African	33
Native Hawaiian or Pacific Islander	2
White	3
Multiple Races	3

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 100,000	7%	
Acquisition and Development of Non-Congregate Shelters	\$ 0	0%	
Tenant Based Rental Assistance (TBRA)	\$ 0	0%	
Development of Affordable Rental Housing	\$ 1,263,270	88%	
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 71,751	5 %	15%
Total HOME ARP Allocation	\$ 1,435,021		

Next Steps

- After comment review period (January 13 – 27, 2023), will bring final Allocation Plan to Board of Commissioners for approval at the first February 2023 meeting
- 2021 Annual Action Plan will be amended to include HOME-ARP funds
- Allocation Plan will be submitted to HUD for Approval

Questions or Comments

For more information contact:

**Cumberland County
Community Development
707 Executive Place
Fayetteville, NC 28305
cccdinfo@co.cumberland.nc.us**

910-323-6112

Gaps Analysis

Fayetteville/Cumberland County Continuum of Care – NC 511

FINAL REPORT
Revised
June 28, 2021



***This report has been prepared by OrgCode Consulting, Inc. for
Cumberland County, North Carolina Department of Community Development.***

***Conclusions and insights are based upon data compiled by
OrgCode Consulting, Inc. | www.OrgCode.com***



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I. Overview

Cumberland County office of Community Development engaged OrgCode Consulting to conduct a gaps analysis of the homeless response system in order to determine resource and system needs. The completion of the gaps analysis fulfills the Continuum of Care's (CoC) Department of Housing and Urban Development (HUD) requirement to conduct a gap and needs analysis as part of its annual CoC Planning activities. In 2021, the gaps analysis and other feedback activities will support the development of a Three Year Homelessness Strategic Plan for the County, City and the Fayetteville/Cumberland County Continuum of Care.

Methodology

OrgCode used multiple investigative and analysis methodologies to prepare the gaps analysis including:

- Comprehensive analysis of HMIS data from 2019 to first quarter of 2021
- Online survey of homeless service providers and CoC leadership
- Online survey of the community
- Survey of persons experiencing homelessness.
- Remote interviews with homeless service provider stakeholders and City and County leadership
- Review of other CoC HUD documents such as Consolidated Annual Performance and Evaluation Reports (CAPERS), Housing Inventory Chart (HIC), Point in Time County (PIT), Grant Inventory Worksheets (GIW) and other policy and procedure and committee reports
- Comparative analysis of other community homeless response systems

II. Perspectives of Persons with Lived Experience

The voice of persons experiencing homelessness are vital to understanding the challenges they face in their efforts to reestablish housing stability in a safe, affordable permanent home with the resources made available in Cumberland County.

Due to COVID travel and meeting restrictions in place during the majority of the project, securing feedback from people experiencing homelessness was a challenge. The Salvation Army agreed to offer clients in shelter and receiving services from the street outreach team the opportunity to take a very brief internet based and paper version of a survey. Ten people were interviewed that had yet to have engagement in coordinated entry and other shelter housing program interventions.

Though there were only a few contributions, the power of their voice and experience can in just a few words enable us to understand their circumstances allows community leaders to understand the complexity of homelessness, the humility in which persons experience homelessness, and the gratitude for the services provided.

When asked what services persons needed but could not find, 7 of 10 mentioned needing access to housing. When asked about services they were able to access and found



helpful only one in 10 referenced a housing related service. Services they were able to access represented basic emergency needs. Despite expressing the need for housing assistance, 7 of 10 expressed that they were hopeful to return to safe, stable housing.

The results of the survey are below:

Thinking about your experience with homeless services in Fayetteville and Cumberland County, what services do you need but cannot find to help end your homelessness?

- Clothes, an affordable place to live
- A cot at night and a shower
- Affordable housing, employment opportunity and transportation
- Need for Housing, I just started working and desperately need a place to stay, please
- More food, shelter, clothes and more people out talking uplifting us that is in need
- Shelter for women
- When I first became homeless I went to the agent, they couldn't help me because of my little bit of income
- No available shelter or senior housing
- Housing and mail service
- Housing assistance for sex offenders

What services have you received that have been helpful?

- Emergency Shelter
- Food
- Medicine for my health
- Food and Clothing
- Food and Clothing
- Help applying for Social Security
- Place to get mail
- Place to take a shower
- Cooked meals
- Case Manager
- Food and Clothing
- Use of a computer
- Meals and Clothing
- Salvation Army, Inasmuch for breakfast, Dream Center
- My agent helped me out a lot

What best describes your household?

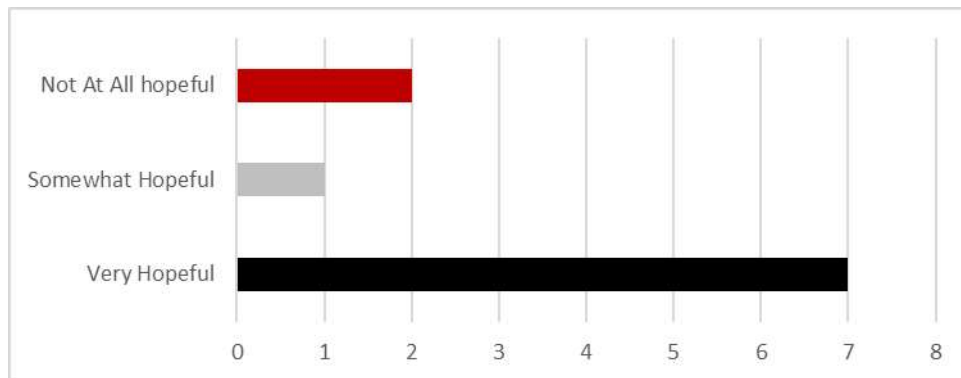
Single adult	100.00% 10
A couple with no children	0.00% 0
A family with children	0.00% 0

Young adult 18 - 24 years old

0.00% 0

Other Comments: *Me and my dog*

How hopeful do you feel today that you will return to safe stable housing soon?



Other Comments:

- *I feel great that the Agent is helping to find housing.*
- *I have been outside since November and will apply for senior housing.*
- *As an offender who can only make money by donating plasma*

III. Perspectives of the Community

To gain an understanding how residents feel about the presence, impact and community response to homelessness in Cumberland County, an invitation to participate in an online survey was distributed through various social media. This was a voluntary survey with a self-selected (non-scientific methodology) respondent pool. Its primary purpose was to identify topics of concern and perceptions of the general community.

625 persons participated in the survey. 64% identified themselves as a private concerned citizen, 22% were lifelong residents and 57% had been residents 5 or more years.

The highest level of agreement from the community of the five questions on leadership was that "Homelessness is a Priority" with 39% responding with either agree or strongly agree. There was significant disagreement with current response to the issue of homelessness. The most significant disagreement was on the overall satisfaction on how local government and homeless services were working to end homelessness (strongly disagree and disagree totaling 64% of respondents).

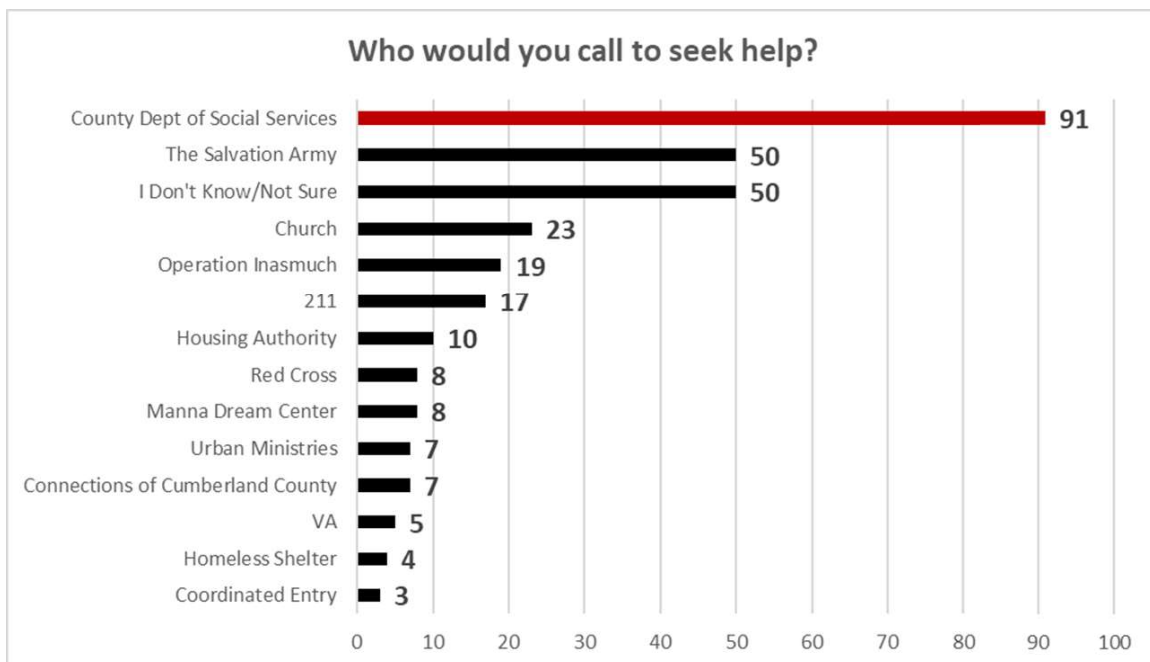


	STRONGLY AGREE	AGREE	NEITHER AGREE NOR DISAGREE	DISAGREE	STRONGLY DISAGREE	DON'T KNOW
Govt, foundations community respond to operational needs of homeless service providers.	5%	20%	21%	24%	13%	17
Homelessness is a Priority	19%	20%	13%	26%	16%	7%
Govt taking action to assure supply of affordable housing for very low -income households.	5%	16%	17%	27%	21%	15%
Overall Satisfaction of how Govt & Providers Working to End Homelessness	4%	10%	17%	33%	31%	6%
County and CoC regularly report the nature and extent of homelessness and progress in ending homelessness.	8%	14%	20%	25%	14%	18%

For perspective, it is important to understand that often the community is unaware of components of the homeless response system and their perspective of homeless response is primarily measured only by the unsheltered homeless they encounter.

This level of disagreement on current response can be interpreted that the community is seeking more action and an improved response to homelessness.

To gauge the community's knowledge of the homeless response system, they were asked to identify where they would go if someone they knew was facing homelessness.



This question is one indicator of marketing efforts and name identification of agencies known to address homelessness. The Cumberland County Department of Social Services

provides many humans service needs. The Salvation Army has a worldwide name-identification as well as serving as the largest emergency shelter in Cumberland County. All the agencies mentioned by survey respondents would be knowledgeable to make a referral to Coordinated Entry, which represents the CoC designated intake entity to the homeless response system including access to most emergency shelter beds.

When asked about the provision of resources available in the community specifically designated for persons at risk of or experiencing homelessness, the community generally expressed dissatisfaction with the current service levels. No component of emergency response assets from Street Outreach to Permanent Supportive housing achieved even 25% satisfaction except for the provision of domestic violence sheltering for families where 32% believed there was a satisfactory supply of emergency housing and programming.

Table 1: Satisfaction with the Provision of Services

	Completely Satisfied	Somewhat Satisfied	Neither Satisfied or Dissatisfied	Somewhat Dissatisfied	Completely Dissatisfied	I Don't Know
Street outreach to people experiencing unsheltered homelessness - living outdoors, in cars, etc.	3.56%	16.86%	14.01%	26.37%	22.57%	16.63%
Emergency shelter beds for families with children experiencing homelessness.	4.29%	18.10%	10.00%	21.43%	27.86%	18.33%
Emergency shelter beds for individual adults experiencing homelessness.	4.51%	14.49%	11.40%	23.75%	28.50%	17.34%
Emergency shelter and services to homeless or runaway youth .	2.63%	12.17%	14.08%	16.47%	28.64%	26.01%
Safe shelter and services to people fleeing domestic violence.	6.71%	26.14%	11.99%	15.35%	17.03%	22.78%
Transitional housing facilities for families with children.	3.37%	15.63%	14.18%	18.51%	22.36%	25.96%
Rapid rehousing , short term rental assistance.	2.88%	9.62%	14.42%	21.88%	28.13%	23.08%
Permanent supportive housing , long term rental assistance coupled with case management.	3.12%	8.15%	12.47%	22.06%	30.70%	23.50%

As the County, City and the Continuum of Care leadership plan for the development of a Three-Year Homelessness Strategic Plan, it was important to gauge the community's understanding of some of the best practices in homeless response systems that might guide strategic decisions and action steps. Respondents were asked about their familiarity with practices in ending homelessness. Generally, the majority of respondents were unfamiliar with practices. This information is important in understanding educational and information needs that should accompany the role out of the strategic plan.

	Not familiar	Somewhat familiar	Very familiar
Housing First	55.20%	31.64%	13.16%
Harm Reduction	63.11%	25.52%	11.37%
Trauma Informed Care	63.66%	22.92%	13.43%
Housing Focused Emergency Shelter	53.47%	33.10%	13.43%
Rapid Rehousing	63.81%	25.99%	10.21%

Permanent Supportive Housing	61.86%	26.74%	11.40%
-------------------------------------	--------	--------	--------

When asked about who should play a leading role in the implementation of the strategic plan, the prevailing opinion was that it should be a shared role between government, service providers and the faith community. In developing a strategic plan, identification of champions for particular initiatives as well as establishing entities with the capacity to commit resources and other to monitor the effectiveness, efficiency and ongoing performance of the system of care.

Shared Leadership - City, County, Non-Profits, Faith-Based	35%
Local Government - City, County, State, Dept. of Social Services, etc.	25%
Faith Based / Non-Profit Organization	15%
A New Entity - Taskforce, Special Committee	1%
The Continuum of Care (CoC)	1%
I Don't Know	6%

Finally, survey respondents were asked to tell what they hope to be accomplished by a strategic plan, and what would be an obstacle to success with the plan. Response narratives filled over 40 pages of concerns, ideas, hopes and challenges of the community. OrgCode organized these comments by tagging them in major subject areas as detailed below.

Table 2: Desired Accomplishments of the Strategic Plan

HOUSING – Build more housing, develop collaboration with landlords, provide sufficient housing subsidies and assure long term access to affordable housing.	24%
SYSTEM IMPROVEMENTS – From outreach, to shelter, to housing, the community expressed more resources to improve the efficiency, effectiveness, cooperation and collaboration throughout the system including needed services, case management and other supports leading to the return to housing.	20%
SHELTER – The building/provision of day shelter and emergency shelter beds. Services in shelter that provide connections to wellness supports, basic needs, employment and housing.	15%
WELLNESS – The community wants to see that the needed health care, mental health care, behavioral care and supports will be available to persons experiencing homelessness.	12%
REDUCING HOMELESSNESS – Primary measure of accomplishment would be overall reduction in homelessness.	12%
OUTREACH – The presence of unsheltered homeless was foremost important. Street outreach, and pathways to supports, housing for the unsheltered. Some hoped for reduction in nuisance activity and panhandling.	10%
EMPLOYMENT – Long-term stability and self-sufficiency is the goal of incorporating employment to homeless services.	10%



A PLAN - To actually produce, approve, and implement the plan with cooperation and community collaboration.	9%
AWARENESS – Raise the awareness of the community on the solutions to homelessness and support more housing.	8%

Housing was the most common stated hopeful accomplishment of a plan followed by improvements to how stakeholders responded, cooperated and implemented solutions.

Table 3: Perceived Potential Obstacles to Accomplishing Goals of the Strategic Plan

SUPPORT SERVICES – Critical supportive services, their availability and delivery would be challenges to successfully. Significant emphasis on mental health and behavioral health services.	22%
MYTHS OF HOMELESSNESS – People experiencing homelessness are perceived to be at the center of preventing success. Causes and experiences of homelessness are resistant to change or accepting services.	16%
SYSTEM & COORDINATION – The capacity and willingness for key stakeholders to deliver the plan in a coordinated fashion or to change the way they provide services.	14%
MONEY/FUNDING – Funding decisions and limitations of resources in the community and the ability for the community to be able to afford additional resources.	13%
POLITICS – Concerns that city and county government would not collaborate or work together or other political decisions would jeopardize success in a plan.	13%
COMMUNITY SUPPORT – The community would not support the plan. Suggestions to make sure it is well communicated, advertised and marketed to the public. There was also concern that community members would be against locations of housing, shelter.	13%
HOUSING – These observations were concerned that NIMBYism would prevent the development of housing, new resources. Concerns those investments won't be made into housing. Need for supports to different types of housing	8%
ECONOMY – Times were hard and there were no jobs for persons experiencing homelessness and continue to create the experience of homelessness in the community.	4%

Perceived obstacles to success of the strategic plan were centered on shortfalls in the access to mental health and substance abuse services. Additionally, there were comments that reflected common generalizations and myths of homelessness centered on individual character rather than systemic influences on what causes homelessness.

IV. Perspectives of Service Providers

Homeless service providers were asked to participate in a survey that dove into more technical and operational elements of the system of care. 24 persons, a majority with over 5 years' experience with Cumberland County's homeless system, participated in the survey.



Additionally, OrgCode also conducted one-on-one interviews over Zoom with 21 providers and leaders. These interviews drew out system and resource observations and experiencing.

Table 4: Perspectives on leadership and coordination.

	Strongly Agree	Somewhat Agree	Neither Agree nor Disagree	Somewhat Disagree	Strongly Disagree	I Don't Know
Program staff communicate and coordinate services effectively when they share the same client or are transitioning care.	36%	21%	7%	14%	7%	14%
Provider agency leadership are engaged in policies, procedures and planning efforts for the Continuum of Care.	29%	29%	14%	14%	7%	7%
Continuum of Care leadership use HMIS data analysis to accurately monitor, evaluate and report progress and performance.	21%	29%	14%	14%	14%	7%
Cumberland County and City government leaders are responsive to the needs of homeless service providers.	14%	50%	14%	14%	7%	0%
Program staff receive evidenced based best practice training to improve their skill set in service delivery.	21%	36%	14%	7%	14%	7%
Public Housing Authorities, Affordable Housing Developers, and other housing representatives actively work to create new affordable rental units.	14%	36%	7%	21%	7%	14%

Of the 24 respondents a majority were in agreement (over 50% agreeing or strongly agreeing) that leadership and providers were effective. The strongest disagreement (4 persons/28%) were in the effective use of HMIS and the creation of new affordable rental units.

Table 5: Housing focused services

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	I Don't Know	N/A
People experiencing a housing crisis and homelessness know where to go to get help.	8%	46%	8%	15%	23%	0%	0%



	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	I Don't Know	N/A
Match and referral of participants to housing programs is easy and efficient .	8%	8%	0%	62%	15%	0%	8%
Programs quickly communicate when they have vacancies .	8%	15%	15%	38%	8%	15%	0%
Emergency Shelters are staffed and trained to support clients in housing planning and navigation .	33%	8%	8%	25%	17%	8%	0%
Assessment phases and assessment tools are useful in developing a client-centered housing plan .	33%	25%	8%	25%	0%	8%	0%
Unsheltered homeless have equal access to housing and supports as sheltered clients.	18%	27%	18%	9%	18%	9%	0%
The housing prioritization factors represent our community's priorities.	15%	23%	23%	15%	15%	8%	0%

There was the most agreement by respondents that people experiencing homelessness would know where to get help, 46%. The least agreement was on ease and efficiency coordinated entry match and referral with 62% disagreeing and 15% strongly disagreeing. The second least agreed upon housing issues was how quickly agencies communicate when they have vacancies.

When asked about how the system provides emergency response services – when people face a housing crisis and homelessness, there was significant disagreement with the effectiveness of the services available. The most significant was for persons being able to access emergency shelter with only 16% agreeing or strongly agreeing and 69% disagreeing and 15% strongly disagreeing.

Table 6: Emergency Response System

	Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree	I don't know
People in need of crisis services are served immediately .	8%	0%	15%	54%	15%	8%
People who have lost their housing can access emergency shelter quickly .	8%	8%	0%	69%	15%	0%
Upon entering the homeless response system, participants are quickly engaged in housing solutions and case management services.	8%	23%	8%	38%	15%	8%
Rapid rehousing houses people rapidly .	0%	15%	23%	38%	15%	8%

When asked about supportive services and case management resources, providers believed most were insufficient except for employment services.



Table 7: Supportive Services Resource Availability

	Sufficient Resources	Insufficient Resources	No Resources Available	I don't know
Street Outreach Workers	31%	54%	8%	8%
Employment Services	62%	31%	0%	8%
Coordination of housing for persons discharging from correctional institutions	15%	62%	0%	23%
Coordination of housing for persons discharging from foster care	15%	62%	0%	23%
Substance Abuse Treatment Services	38%	54%	0%	8%
Mental Health Care Services	23%	77%	0%	0%

Respondents also believed that there were insufficient resources of any of the basic components of homeless and housing services.

Table 8: Homeless Shelter and Housing Resources

	Sufficient Resources	Insufficient Resources	No Resources Available	I don't know
Homeless Prevention resources to assist households to retain their housing	31%	69%	0%	0%
Diversion resources to provide alternate housing solutions and diverting people from emergency shelter	0%	69%	0%	31%
Emergency Shelter or hotel vouchers for adults, individuals and couples	15%	85%	0%	0%
Emergency Shelter for Unaccompanied Youth	8%	46%	15%	31%
Emergency Shelter or hotel vouchers for families with children	15%	77%	0%	8%
Emergency Shelter or hotel vouchers for households fleeing violence	31%	62%	0%	8%
Rapid Rehousing Rental Assistance	23%	46%	8%	23%
Permanent Supportive Housing	15%	54%	0%	31%
Housing Choice Vouchers (Section 8) with a Homeless Preference	8%	54%	8%	31%

When asked about the array of housing focused services that are part of best practice systems of care, providers found all to be insufficient for current and future needs or did not know if they were available.

Table 9: Housing Focused Resources

	Sufficient Resources for Current and Future Need	Sufficient Resources for Current Need	Insufficient Resources for Current and Future Need	Insufficient Resources for Current Need	No Resources Available	I don't know
Housing Prevention and Diversion Case Managers	0%	8%	46%	23%	8%	15%
Housing Planners and Navigators	8%	15%	38%	23%	8%	8%
Housing Search identifying affordable, rental units (including low barrier tenant screening)	8%	0%	46%	31%	8%	8%
Coordination of housing for persons discharging from correctional institutions	0%	0%	54%	23%	0%	23%
Coordination of housing for persons discharging from foster care	0%	23%	46%	8%	0%	23%
Landlord mediators/negotiators	8%	0%	23%	23%	8%	38%
Flexible funds for identifications, birth certificates, other fees	8%	23%	23%	8%	8%	31%
Housing start-up kits (i.e., cleaning supplies, kitchen ware, bed)	0%	15%	38%	0%	0%	46%
Credit, Rental, Criminal Background Checks for housing planning	8%	15%	31%	15%	0%	31%
Transportation assistance for housing search	8%	15%	46%	8%	8%	15%

V. System Data Analysis

To quantify the levels of need for services and housing and to identify specific gaps, we examined a variety of data sources to understand actual service levels and demands.

Persons seeking housing and shelter

The United Way North Carolina provides a data dashboard on their website that reports the nature and frequencies of regular data on persons calling 2-1-1. A snapshot of data on service requests in Cumberland County between June 3, 2020 through June 2, 2021 revealed the following:

Table 10: Cumberland County 2-1-1 Calls June 3, 2020 – June 2 2021

Total Requests	17,441
Housing & Shelter	6,220 (35.7%)
• Shelters	596 (9.6%)
• Low-Cost Housing	906 (14.6%)
• Home Repair / Maintenance	119 (1.9%)

• Rent Assistance	4,180 (67.2%)
• Mortgage Assistance	167
• Landlord / Tenants Issues	246
• Contacts	2
• Other Housing & Shelter	2

Consistently, month after month the top service information requests over 2-1-1 are for housing and shelter. In looking at comparative data in North Carolina, Cumberland County ranks as one of the top counties in housing and shelter requests.

Highest rates of requests for housing and shelter on 2-1-1 comparing 2020 to 2021.

Table 11: Top Ranked Counties 2-1-1 Housing and Shelter Requests

2020		2021	
Rank	County	Rank	County
1	Cumberland, NC	1	Mecklenburg, NC
2	Mecklenburg, NC	2	Cumberland, NC
3	Buncombe, NC	3	Pitt, NC
4	Pitt, NC	4	Wilson, NC
5	Edgecombe, NC	5	Edgecombe, NC

Intake data for the homeless response system is provided from the coordinated entry provider, Cumberland Healthnet. Cumberland Healthnet manages access data initially through QuestionPro to manage call inflow, and then in the Homeless Management Information System (HMIS) for individuals and households that begin to receive triage/intake/referrals into the homeless response system. Ten months of data are presented in the table below:

Table 12: Cumberland Healthnet CES Access data July 2020 - April 2021

2020-2021	TOTAL Actual Services	%	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	Jan-21	Feb-21	Mar-21	Apr-21
Phone encounters	5589											
Calls	3829	69%	0	252	732	713	766	0	126	530	452	258
Voicemails	1760	31%	0	69	235	207	285	0	331	249	163	221
Referrals	364											
Questionpro	364		0	54	91	39	49	0	1	2	4	124
Gender	4149											
Female	2268	55%	210	146	139	161	235	234	205	278	330	330
Male	1881	45%	191	124	92	107	187	197	144	249	295	295
Income	1813											
Below < 30% AMI	1306	72%	87	131	6	78	96	117	196	109	243	243
Very low Income 30% - 50%	201	11%	10	36	0	1	14	16	34	12	39	39



Low Income 51% - 80%	183	10%	3	31	0	5	8	7	12	75	21	21
Moderate Income 80%	123	7%	0	7	0	16	10	8	8	54	10	10
Households	2813											
Total number of households serve	2813		231	266	194	170	201	216	268	316	390	561
Female head of household	1387	49.31%	69	97	76	102	122	125	154	168	215	259
Disabled	760	27.02%	23	36	20	34	59	61	86	131	152	158
Elderly	391	13.90%	46	44	24	30	34	37	37	41	50	48
with Minors	727	25.84%	93	88	74	30	64	62	70	77	73	96
Race & Ethnicity	4514											
Hispanic Latino	304	7%	28	17	19	25	25	31	35	38	40	46
White Caucasian	466	10%	34	24	30	30	35	37	43	69	86	78
Black or African American	3406	75%	156	206	236	294	345	355	406	414	491	503
Asian	13	0.29%	2	2	1	1	1	1	1	2	1	1
Native Hawaiian or other Pacific Islander	54	1%	1	0	0	1	1	0	9	9	14	19
American Indian, Alaska Native and White	57	1%	2	2	2	1	1	1	2	4	2	40
Black or African American and White	6	0%	6	0	0	0	0	0	0	0	0	0
American Indian or Alaska Native & Black or African American	10	0%	0	0	0	0	0	0	0	0	0	10
Other Multi Racial	198	4%	18	15	15	19	18	17	19	17	20	40

The CES call volume data reflects the over representation of Black households that are experiencing a housing crisis (75%) compared to the overall rate of 39% of black people in the population of Cumberland County. This overrepresentation is experienced in communities all over the United States and represents a priority in both federal initiatives and local continuum of care to address racial equity within their strategic planning efforts.

Income rates of persons seeking housing and shelter assistance also reflect national trends where the majority of household incomes are less than 30% of the area median income (AMI). 72% of the households calling in for assistance over 10 months fell below 30% of AMI for Cumberland County. The table below provides an understanding of where those income caps are:

Table 13: HUD Income limits Below 30% AMI

Fayetteville, NC HUD Metro FMR Area	Household Size 1 person	2 persons	3 persons	4 persons	5 persons
Below 30% AMI Income Limit Annual of Median Income of \$59,600	\$12,550	\$14,350	\$16,150	\$17,900	19350



The National Low Income Housing Coalition (NLIHC)¹ provides research data detailing the housing supply and incomes of communities and provides an understanding of the relationship between income and housing access.

North Carolina State Facts

Minimum Wage **\$7.25 per hour**

Average Rental Wage **\$15.92 per hour**

2-Bedroom Rental Wage **\$17.67**

Affordable Rent for Low Income Households:

- **Minimum Wage Worker affordable rent:** \$377 per month for rent
- **Household at 30% of Area Median Income:** \$535 per month for rent
- **Worker Earning Average Renter Wage:** \$828 per month for rent

Fair Market Rent for Cumberland County:

- **1-Bedroom Fair Market Rent** \$773 per month
- **2-Bedroom Fair Market Rent** \$919 per month

Working at minimum wage \$7.25 per hour each week, a household will have to work 82 hours per week to afford a modest 1 bedroom rental home at Fair Market Rent.

Number of Households	North Carolina	Cumberland County
TOTAL	3,918,597	124,418
RENTER	1,369,892	61,023
PERCENT RENTERS	35%	49%
Housing Wage	North Carolina	Cumberland County
ZERO-BEDROOM	\$14.31	\$13.83
ONE-BEDROOM	\$14.86	\$13.88
TWO-BEDROOM	\$17.67	\$16.42
THREE-BEDROOM	\$23.56	\$22.85
FOUR-BEDROOM	\$28.88	\$27.88
Fair Market Rent (2020)	North Carolina	Cumberland County
ZERO-BEDROOM	\$744	\$719
ONE-BEDROOM	\$773	\$722
TWO-BEDROOM	\$919	\$854

¹ <https://reports.nlihc.org/oor/north-carolina>



THREE-BEDROOM	\$1,225	\$1,188
FOUR-BEDROOM	\$1,502	\$1,450
Annual Income Needed to Afford a Unit	<i>North Carolina</i>	<i>Cumberland County</i>
ZERO-BEDROOM	\$29,758	\$28,760
ONE-BEDROOM	\$30,910	\$28,880
TWO-BEDROOM	\$36,751	\$34,160
THREE-BEDROOM	\$49,014	\$47,520
FOUR-BEDROOM	\$60,062	\$58,000
Minimum Wage	<i>North Carolina</i>	<i>Cumberland County</i>
MINIMUM WAGE	\$7.25	\$7.25
RENT AFFORDABLE AT MINIMUM WAGE	\$377 a month	\$377 a month
Work Hours/Week at Minimum Wage	<i>North Carolina</i>	<i>Cumberland County</i>
ZERO-BEDROOM	79	76
ONE-BEDROOM	82	77
TWO-BEDROOM	97	91
THREE-BEDROOM	130	126
FOUR-BEDROOM	159	154
Renter Wage	<i>North Carolina</i>	<i>Cumberland County</i>
ESTIMATED MEAN RENTER WAGE	\$15.92	\$13.47
RENT AFFORDABLE AT MEAN RENTER WAGE	\$828	\$700
Work Hours/Week at Mean Renter Wage	<i>North Carolina</i>	<i>Cumberland County</i>
ZERO-BEDROOM	36	41
ONE-BEDROOM	37	41
TWO-BEDROOM	44	49
THREE-BEDROOM	59	68
FOUR-BEDROOM	73	83
Supplemental Security Income (SSI) Payment	<i>North Carolina</i>	<i>Cumberland County</i>
SSI MONTHLY PAYMENT	\$783	\$783
RENT AFFORDABLE TO SSI RECIPIENT	\$235	\$235

Rent Affordable at Different Income Levels	<i>North Carolina</i>	<i>Cumberland County</i>
30% OF AREA MEDIAN INCOME (AMI)	\$535	\$435
ESTIMATED RENTER MEDIAN HOUSEHOLD INCOME	\$894	\$865

The NLIHC data provides a backdrop of household income needed to maintain or return to housing long term. Often persons experience chronic and episodic homelessness will have \$0 or SSI only income. Housing gaps are filled by a combination of both household income increases (employment, informal income sources and mainstream benefits) matched with housing subsidies (one-time, short term, or long term) depending on households characteristics, needs, assets, and income generating capacity.

The at-risk and homeless households also commonly face other housing barriers frequently being screened out through property management tenant screening tools (income sources, rental history, credit, criminal history, etc.). These factors complicate the housing crisis. Further, disabling conditions, trauma experiences and other vulnerabilities often require levels of support during the housing process and ongoing to achieve housing stability.

Affordable Housing Supply

The table below details the affordable units available for households whose income “extremely low income” which is below 30% of the Area Median Income. This household income grouping represents nearly all persons presenting experiencing homelessness.

Statewide, there are 347,275 extremely low income households and only 156,365 units available that are affordable to that income group. For every 100 households at this income level, there are 45 units available. Of these extremely low income households, 66% are severely cost burdened in their housing costs.

When compared to other North Carolina communities, Cumberland County has fewer extremely low income households as a portion of the total population, however when examining the number of affordable and available rental units per 100, Cumberland County has the fewest. Additionally, when looking at cost burden for households who are extremely low income, compared to the selected comparison communities, Cumberland County has the highest rate of households cost burdened (90%) and severely cost burdened (84%).



North Carolina Housing Gap Data (National Low Income Housing Coalition)	North Carolina	Cumberland County	Charlotte- Concord- Gastonia, NC-SC	Raleigh, NC	Virginia Beach- Norfolk- Newport News, VA- NC
Extremely Low Income Households and Available Rentals					
EXTREMELY LOW INCOME RENTER HOUSEHOLDS	347,275	9,445	67,121	43,823	50,311
AFFORDABLE AND AVAILABLE RENTAL HOMES	156,365	5,141	25,198	14,978	17,623
Surplus (Deficit) of Affordable and Available Rental Units					
AT OR BELOW EXTREMELY LOW INCOME	-190,910	-4,305	-41,923	-28,845	-32,688
Affordable and Available Rental Units per 100 Households at or below Threshold					
AT OR BELOW EXTREMELY LOW INCOME	45	22	38	34	35
% of Renter Households with Cost Burden					
AT EXTREMELY LOW INCOME	85%	90%	87%	84%	85%
% of Renter Households with Severe Cost Burden					
AT EXTREMELY LOW INCOME	66%	84%	67%	68%	72%

Definitions and Data Sources of Affordable Housing Classifications

Income Category

- Extremely Low Income (ELI) Households Household income is at or below 30% of the area's HUD Adjusted Median Family Income (HAMFI)

Level of Housing Cost Burden

- Unaffordable Cost Burden* Household spends more than 30% of their income towards housing costs (including utilities)
- Severe Cost Burden Household spends more than 50% of their income towards housing costs (including utilities)

Income and affordable housing data comes from the American Community Survey (ACS) that is analyzed by the NLIHC to produce estimates of the shortage of affordable and available homes. The sample size for the ACS is too small to allow for reliable estimates of smaller geographies such as Cumberland County. To generate these estimates, the NLIHC uses a special tabulation of HUD's Comprehensive Housing Affordability Strategy (CHAS) data in combination with the HUD analyzes 5-year American Community Survey data. The data used covers 2013-2017.

Supportive Housing Gap



A majority of Continuum of Care funded permanent supportive housing beds (33) are assigned to families. The majority of need for permanent supportive housing beds in Cumberland County are for individual adults. There have been no turnover of PSH beds in nearly two years, somewhat unusual for a CoC.

Because of the limited availability and no turnover of CoC PSH, the primary housing opportunities for chronic or disabled households have been mainstream vouchers (MSV). This program targets three groups of participants including: 1. Chronically homeless with Mental Health and Substance Use Disorders/SUD for the MSV based on the by names list; 2. Those exiting or at risk of hospitalization; and 3. Those on the section 8 waitlist with an adult member with a disability.

There are 62 MSV in Cumberland County, all have been issued but many individuals have had difficulty in locating suitable housing. Alliance Health signed an MOU with the Fayetteville Metropolitan Housing Authority to manage the referrals, and supportive services through their provider network.

Individuals that are service connected with the mental health managed care organization have the best change of acquiring the HCV homeless preference housing. Those not successful in accessing these vouchers lack for pre-tenancy housing navigation, search, and landlord advocacy support as well as identifying a source for the provision of housing-based case management and supportive services to improve housing stability.

The majority of PSH in the community are Veterans Affairs Supportive Housing (VASH) vouchers that are dedicated only for eligible Veterans (228 units).

Rapid Rehousing

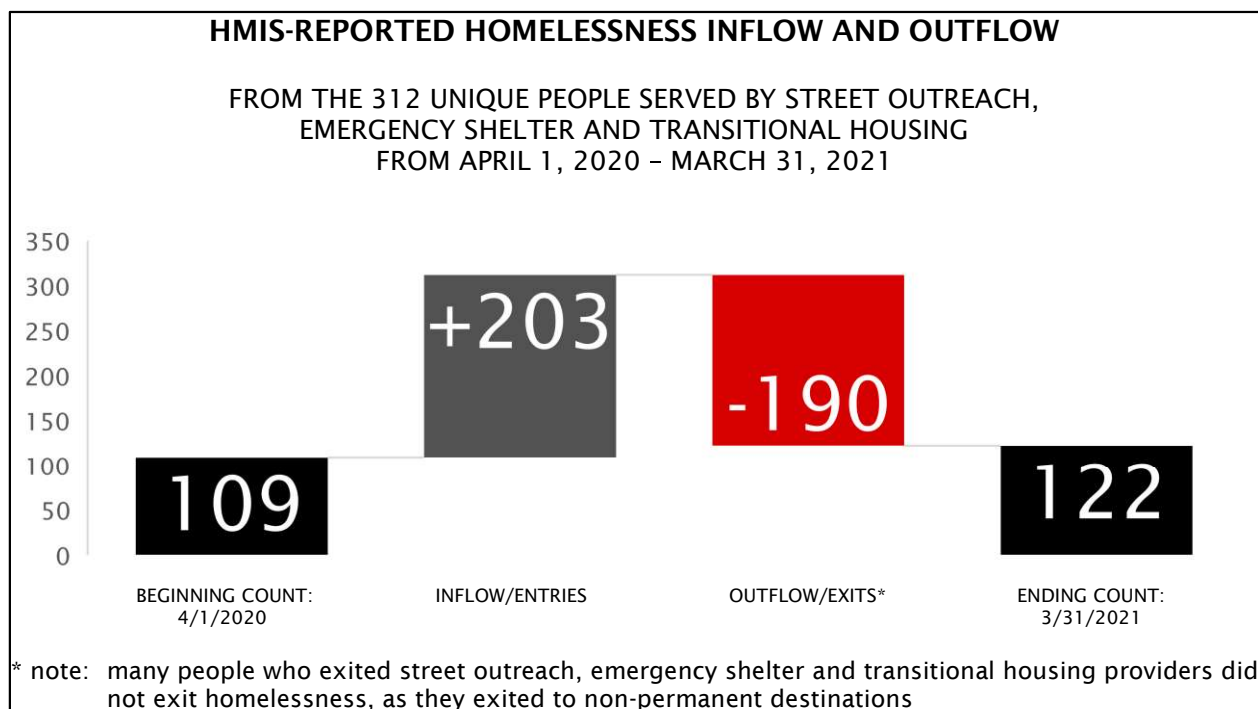
Rapid Rehousing represents the most available housing subsidy option for households experiencing homelessness with CoC and CARES act funding (ESG-CV). 29 units are available in the inventory and have sustained occupancy throughout the year.

Inflows and Outflows

The waterfall chart below examines HMIS data from 2020-2021. The chart, reading left to right, captures individuals and households entering the homeless system (meeting the HUD definition of homeless – unsheltered, emergency sheltered, in transitional housing and those that left the system.

Note that this data represents persons entered into the HMIS data system. Not all agencies serving persons experiencing homelessness use this system. Any data analysis to understand the nature and extent of homelessness and measure performance is always improved with the centralization and use of a shared data system.





Homeless System Overall Performance:

- 190 exits over 365 days
- 91 exits to permanent housing (48%)
- 99 exits to other locations (52%)

Outcomes by Provider Type:

Street Outreach:

- 1 exit to permanent housing (6%)
- 16 exits to other locations (94%)
- 85 day average length of stay
- 90 day median length of stay

Emergency Shelter:

- 29 exits to permanent housing (27%)
- 79 exits to other locations (73%)
- 73 day average length of stay
- 26 day median length of stay

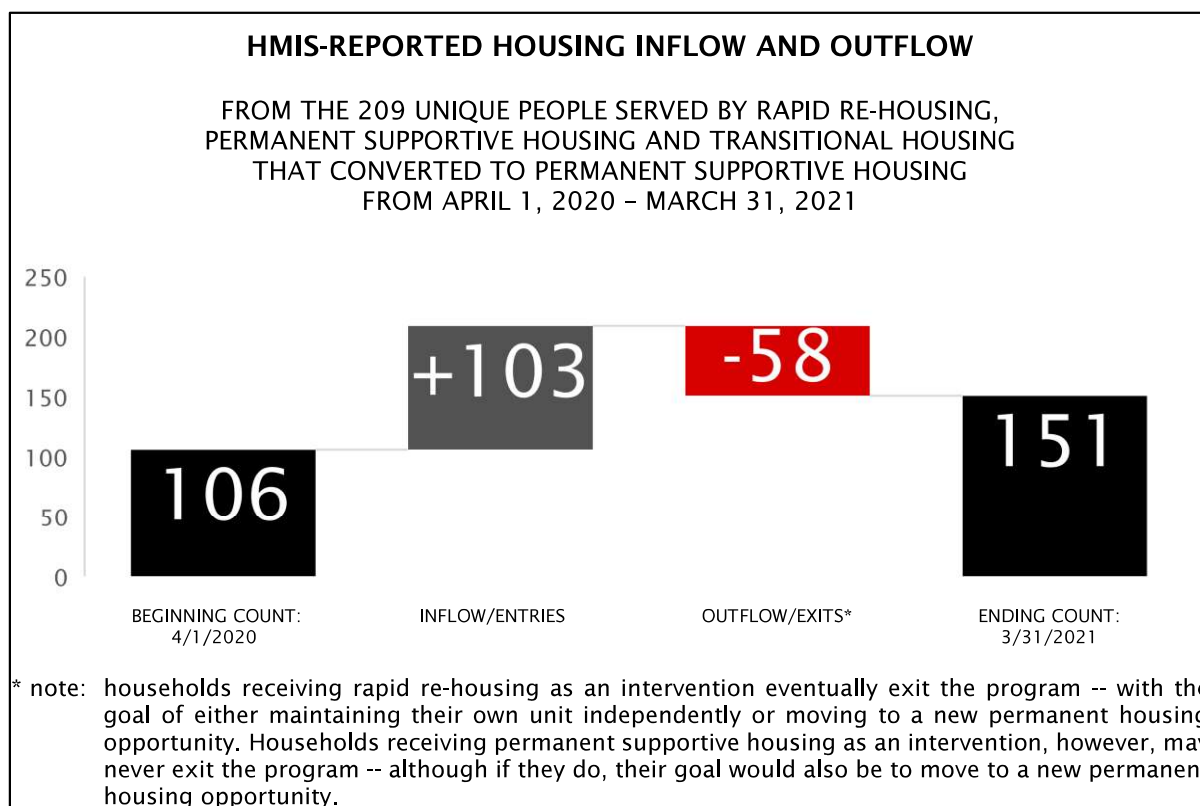
Transitional Housing:

- 61 exits to permanent housing (94%)
- 4 exits to other locations (6%)
- 453 day average length of stay
- 372 day median length of stay

Of the 99 exits to other locations during the period (exits not to a permanent housing location) 83 were to “client doesn’t know/refused/data not collected” or an exit interview



not completed. This can be a common occurrence especially from emergency shelter (79 people) as persons leave on their own without final consultation with staff. The rest of the exits to other locations included: 4 to substance use treatment, 4 to transitional housing, 3 to another emergency shelter, 1 to hospital, 1 to unsheltered homelessness, 1 to a psychiatric institution, 1 to a halfway house, and 1 to temporary stay with family.



In examining housing inflows and outflows from permanent housing projects provides the level of flow through the system. Over the course of the year, primarily through the addition of Rapid Rehousing units, there were more persons served through permanent housing resources. The 58 people that exited housing represent an annual turnover of Rapid Rehousing beds only, as there were no exits from PSH during the time period. Of those 58, 31 exited to permanent supportive housing, 11 to rental public housing, 2 to permanent housing and 14 to other locations.

Emergency Shelter

Cumberland County has very few emergency shelter beds that are part of the coordinated entry and HMIS participation inventory. Coordinated Entry referral is required to access shelter beds except for extreme weather events / winter (called "White Flag"). The Salvation Army provides 1 group unit for single men, 1 group unit for single women and 6 units for families with children for a total of 32 beds. There is also a 6-bed capacity for persons fleeing family violence.

A previously used facility (Hope Center) owned by the City of Fayetteville is not currently operating as the City seeks an operator to provide up to 20 beds.



Demand for shelter is most accurately measured by persons experiencing unsheltered homelessness (encampments, vehicles) and persons supported in hotel through non-profit vouchers.

As detailed in the community comparative analysis in this report, Cumberland County has a larger unsheltered population comparing point in time counts proportional to the size of the population. On the night of the homeless count in 2020, over half, 55%, or people experiencing homelessness were unsheltered, spending the night outdoors. This was significantly higher than the comparative communities. Additionally, the Fayetteville/Cumberland County also has the least number of emergency shelter beds when comparing housing inventory charts that are submitted annually to HUD, as a proportion to the size of the community's population.

	Fayetteville/ Cumberland County CoC (NC-511)	Shreveport LA/NW LA CoC (LA-502)	Huntsville/North Alabama CoC (AL-503)	Asheville Buncombe County CoC (NC-501)	Raleigh/Wake County CoC (NC-507)
<i>ES Beds per 1,000 population</i>	38 beds .113 beds per 1000	253 beds .537 per 1000	530 beds .896 per 1000	259 beds .9916 per 1000	509 beds .454 per 1000
<i>% UN of PIT</i>	55%	14%	28%	12%	24%

VI. Examining System Infrastructure

Coordinated Entry

Coordinated entry services (CES), provided by Community HealthNet, triages persons facing a homeless crisis and facilitates entry into participating emergency shelters. The Coordinated Entry intake is currently staffed by only 1.5 FTE positions with intentions to expand to 3.5 FTE.

The CoC conducted a CES annual Evaluation in June 2020 and outlined a number of beneficial action steps for improvement. As part of OrgCode investigation, we conducted a brief workshop with key stakeholders involved in the design, management, use and evaluation of the coordinated entry process. That meeting identified key limitations, needs and system improvements for coordinated entry, many of which affirmed the 2020 evaluation.

	STRENGTHS	WEAKNESSES	OPPORTUNITIES	THREATS
ACCESS	-Knowledgeable Provider of CES - Improved Centralization - Question Pro 24/7 - CallPoint technology	- Getting Chronic Unsheltered Connected - Few ES beds	- New PATH Street Outreach -New Salvation Army Street Outreach	-COVID reduction in Beds -Marketing – Community Knowledge how system works -Mis-directed Think CES is a housing guarantee
ASSESSMENT	-CES is maintaining 72 hour turnaround	-Not enough health/disability information collected	- Improve assessment tool housing barriers,	

		-Need eligibility info	vulnerabilities, service needs - Adopt progressive engagement strategies in shelter	
PRIORITIZATION	- Have CES housing priority list process	- Need supportive services packaged with mainstream vouchers and rapid rehousing	-Create Rapid Rehousing 'Bridge' Housing between RR and PSH -PATH will assist in making those service - CARES money	-Can't find clients potential tenants -- Need low and moderate acuity clients resources
REFERRAL / MOVE IN	-MSV with homeless preference takes CES referrals	-Need Case Management Pre-Tenancy work -Need Housing navigation, search, placement assistance -Not all PSH is taking referrals from CES as required -No PSH turnover	- Capitalize on CARES funding... CARES ESG-CV ... Rapid Rehousing - Develop MOVING ON to open up PSH queue...Background issues... -Build Landlord recruitment -Affordable Housing Study in progress -The new Emergency Housing Vouchers for homeless – 33 with possibly 17 more	- Landlord screening out - Few affordable units - Few accessible units/ HQS qualified

HMIS

- HMIS has 1.0 FTE staff to conduct all functions including data quality, reporting, training.
- HMIS licenses, trainings and staff position are funded through the City and County
- Not all direct service providers participate in HMIS including shelter and transitional housing providers. SSVF provides significant resources that impact service levels and system outcomes but they are not recorded in the HMIS in order to reflect those successes.

VII. Comparing Homeless Response Systems

There are no two continuum of care communities that are completely alike. All range in geographic, resource, economic and housing market influences. However, there are some basic metrics that can offer perspectives on how Cumberland County is responding, performing and resourcing homelessness.



	Fayetteville/ Cumberland County (NC-511)	Shreveport LA/NW LA (LA-502)	Huntsville/North Alabama (AL-503)	Asheville Buncombe County CoC (NC-501)	Raleigh/Wake County (NC-507)
Total Population	335,509 ²	471,160	591,513	261,191	1,112,000
Latest PIT and Unsheltered	2020 - 297 (UN 165)	2020 – 298 (UN 42)	2020 – 561 (UN 155)	2020 – 547 (UN-65)	2020 – 974 (UN 232)
Increase/Decrease Homelessness (change from 2019 to 2020)	372 to 297 -25%	375 To 298 -26%	424 To 561 +24%	580 To 547 - 6%	983 To 974 -1%
CoC 2021 Grant Inventory	\$718,673	\$4,116,646	\$718,541	\$1,774,234	\$3,709,738
% of Persons in Poverty	18% ³	25.6%	11.5%	12.2%	8%
HHLD > 50% Cost Burdened Renters (Income < 30 % of HAMI⁴)	6,205	5,950	6,745	3,400	18,695
FMR 1 BDR	\$743	\$715	\$690	\$1,099	\$1,053
Homeless Response System Performance 2019 HUD Tableau	- 1a LOS ES SH TH- 194 days - M2 Total Returns to homelessness 24 mth - 5 % - M7b 1 Percent with Successful ES, TH, SH, PH-RRH Exit – 75%	- 1a. LOS ES SH TH- 69 days - M2Total Returns to homelessness 24 mth- 15% - M7b1 Percent with Successful ES, TH, SH, PH- RRH Exit – 36%	- 1a. LOS ES SH TH- 61 days - M2Total Returns to homelessness 24 mth- 15% - M7b1 Percent with Successful ES, TH, SH, PH-RRH Exit – 31%	- 1a.LOS ES SH TH- 173 days - M2Total Returns to homelessness 24 mth- 18% - M7b1 Percent with Successful ES, TH, SH, PH- RRH Exit 59%	1a.LOS ES SH TH- 66 days M2Total Returns to homelessness 24 mth- 23% - M7b1 Percent with Successful ES, TH, SH, PH-RRH Exit – 23%
HIC ES Beds	38	253	530	259	509
HIC TH Beds	94	52	42	264	239
HIC RRH	29	152	13	31	219
HIC PSH Beds	223 (33 non-VASH)	565 (329 non-VASH)	369 (74 non-VASH)	511 (186 non- VASH)	565 (565 non- VASH)

Some of the more notable differences in the community comparisons is the amount of HUD funded resources. Factors include the poverty levels (Louisiana) on HUD allocations and CoC funding histories including receipt of bonus projects over the years. Also, communities that have more rental assistance line items, those budgeted amounts are frequently increased each year due to fair market rents. Cumberland County CoC grant of \$713K only includes \$66K in rental assistance with the majority of funding for Supportive Services and Operating Costs.

² American Census Survey 2019 Estimates

³ Small Area Income and Poverty Estimates (SAIPE) Program 2019

⁴ HUD Area Median Family Income



The number of emergency shelter beds in Cumberland County is significantly lower (38) in comparison to other communities. Additionally, the proportion of the homeless that are unsheltered 165 of the total 297 (55%) is significantly higher.

The number and performance of transitional housing programs can influence the average length of stays in homelessness (measure 1a) as well as having few housing resources (RRH and PSH). The majority of PSH housing in Cumberland is veteran only housing (VASH). When lengths of stay are long, beds do not turn over and leave persons unsheltered with no housing option.

Total returns to homelessness after 24 months is reported at only 5%. Analysis of current data in the inflows and outflows from the last ten months indicates a short term return rate of greater than 5% and should be monitored. The national average in 2019 was 17%. It is possible the exceptional low return rate is also due to the number of homeless persons that are not being entered into the HMIS and the limited history of street outreach programs.

The rate of 75% of successful exits to housing is unusually high compared to the other four communities as well as compared to the national average of 45%.

VIII. System Models to Meet Housing Needs

The objective of this analysis is to examine the characteristics of those persons that are not succeeding in the current system, not able to find a pathway out of homelessness or continue to return to homelessness and what it would take to resolve those experiences in homelessness.

From the inflow and outflow estimates, aggregate stayer information from CAPER reports, and personal-level household and acuity level data of stayers and long term homeless, the following analysis assists in building system models of housing strategies and resources and levels of impact.

1. *Making incremental improvements* – Addressing identified priorities with resource shifting, funding reallocation, and/or system redesign. Impact results in more effective pathways through the system, slight improvements in improvement measures.
2. *Making significant improvements* – Addressing multiple priorities with both CoC and non-CoC resources including resource and funding reallocations, system redesign and new community resource commitments. Measurable improvements in performance.
3. *Meeting most housing needs* – Envisioning what it would take to achieve an end to homelessness through a systematic response that ensures homelessness is prevented whenever possible or if it can't be prevented is a rare, brief, and one-time experience. These options represent identifying new resources and brought to scale based on the actual populations and data in the community.



Housing Needs of Families with Children

Making Incremental Improvements	Making Significant Improvements	Meeting Most Housing Needs
<ul style="list-style-type: none"> • Implement quarterly assessments of PSH clientele to demonstrate progress in housing stability and evaluate for self-management and independent living to “move up” into HCV or other subsidized or private housing creating new vacancies for families on the CES Housing Priority List • Target / prioritize families with young children, disabled family members and large families for HCV Homeless Preference • Systemize application and enrollment in mainstream benefits, earned income tax credit, and other benefits within first two weeks of shelter 	<ul style="list-style-type: none"> • Target families with children for Rapid Rehousing with greater supportive services connections to employment training , placement, childcare and flexible subsidy policies • Develop Family Diversion Programs to identify HUD At-Risk Families to support shelter diversion and rapid exit with housing navigation, search and one-time financial assistance. • Develop landlord engagement strategies. • Support shelter-based case management focused on housing assessments, barriers and intensive housing navigation, search and placement. 	<ul style="list-style-type: none"> • Screen all families who do not self-resolve homelessness after 30 days of shelter for HCV, FUP and other PHA and related subsidies. • Connect families to guaranteed childcare support and enrollment in health care • Develop workforce strategies – matched with childcare. • Create 32 Units of flexible medium term RRH (up to 24 months)

Housing Needs of Single Individuals

Making Incremental Improvements	Making Significant Improvements	Meeting Most Housing Needs
<ul style="list-style-type: none"> • Implement quarterly assessments of PSH clientele to demonstrate progress in housing stability and evaluate for self-management and independent living to “move up” into HCV or other subsidized or private housing and create PSH vacancies for chronic persons on the Housing Priority List 	<ul style="list-style-type: none"> • Apply for additional / bonus CoC PSH beds for chronically homeless during the annual competition. • Develop housing navigation, search and placement skilled professionals connected to street outreach and emergency shelter. • Develop a master lease housing program to 	<ul style="list-style-type: none"> • Assist FMHA in building additional voucher programs and expanding homeless preference options – including identifying supportive services partnerships. • Create a structured ‘bridge’ housing program that establishes initial housing through RRH and evaluates over time need for chronic to ‘bridge’ to



Making Incremental Improvements	Making Significant Improvements	Meeting Most Housing Needs
<ul style="list-style-type: none"> • Develop shared housing, roommate matching programs. • Develop supportive employment programs 	<p>provide supportive housing for vulnerable populations with significant housing barriers (backgrounds, etc.)</p> <ul style="list-style-type: none"> • Develop landlord engagement strategies, good neighbor programs, incentives to counter perceived financial 'risk' 	<p>PSH when appropriate.</p> <ul style="list-style-type: none"> • Create 12 0-1 BR Units of Assertive Community Treatment supported PSH. • Create 14 0-1 BR Units of Intensive Case Management supported PSH. • Create 24 1 BR Tenant Supportive Services Coordination PSH connected with employment training and supportive employment

IX. Services and System Gaps Recommendations

Street Outreach Services

- **Outreach Strategy** – Collaboration between housing focused street outreach, emergency response from Police and skilled mental health street response can have a significant impact on community concerns. As the PATH team (Communicare) comes online and the Fayetteville Police Department develops mental health supports for officers, and the Salvation Army Street Outreach expand its coverage, the community should develop coordination, communication and client information sharing protocols.
- **Housing Focused Street Outreach** – Impactful street outreach is driven by a housing focus. Though there are components of the work that assist with basic needs (food, water, information), they should be lead with a housing focus in the same way case managers are in a shelter setting. Recording of all engagements in HMIS ensures that homelessness documentation is continuously secured and street outreach should become an access point for coordinated entry. Housing planning and service connections make up the majority of street outreach efforts in order to realize outcomes of reducing unsheltered homelessness, providing direct connections to shelter and providing housing navigation and placement.

Emergency Shelter & Services

- **Emergency Shelter beds for single individuals**

Cumberland is under resourced for emergency shelter beds. In making planning decisions on beds, configurations and target populations, the community must examine its unsheltered populations and existing shelter services and needs. Generally, in ES planning, one shelter bed is estimated to turn over at least 4 times



a year (avg. 90 day stay maximum). Housing Focused case managers should manage caseloads of no more than 20 persons with work that is solely committed to housing assessment, navigation, preparation, search and placement transitions. In the planning and development of housing focused shelter services, the equation should also include resources for the *exit* from those shelter beds.

▪ **Housing Focused Emergency Services**

Day services for all persons experiencing unsheltered and emergency shelter that provide housing focused case management, housing information, housing navigation, housing placement. Reinforcing housing based emergency shelter will support performance metrics to reduce the length of stay in homelessness and improve shelter exits to housing.

On average 60% of people who become homeless will be homeless one time and the average length of time they experience that homelessness is correlated to the available housing services and resources. Housing services include:

- Private sector housing listings, updated daily and posted publicly in shelter, day services, meal locations.
- Assessment of housing barriers and problem solving – rapid exit housing clerks.
- Documentation readiness
- Housing Navigation – application preparation, background pre-searches, landlord advocacy, rent readiness.
- Housing Search – transportation, landlord negotiation and advocacy
- Housing Placement – one-time financial assistance, housing set up, move in assistance.

Where CES is directly serving shelter clients, outcomes for successful exits are more frequently experienced as their scope of work is entirely housing focused.

- **Critical Documents** - Critical documents acquisition such as birth certificates, transcripts, and state identifications are also a common barrier to securing housing. These services need to be made broadly available to persons in shelter and experiencing unsheltered homeless with providers assessing document needs early on in their client engagements to begin what can sometimes be a lengthy multi-step process.
- **Flexible Funds** – The need for one-time rent and non-rent related financial assistance that is low-barrier, quickly administered, and accessible to front-line staff can support both diversion and rapid resolution/rapid exit efforts for people where eviction prevention was not possible and homelessness is imminent. These funds can be targeted to low and moderate acuity shelter stayers to resolve barriers to housing applications, employment, or other similar needs to provide opportunity for rapid exit from shelter. Such funding would be directed to those persons experiencing homelessness not able to be served with existing CARES funding. Flexible funding is commonly used for the purpose of critical documents.

- **Formalize Employment Services Accessible in Shelter and to Persons in Rapid and Permanent Supportive Housing** – Ending homelessness requires that the cost of housing and available household income meet. This often requires piecing together the needed resources from income, mainstream benefits, one-time, short term or long term housing/rental financial assistance. Opportunities for earned income generation has to be supported...and for families with children, coupled with childcare.
- **Pre-Tenancy Supports** – Housing prep, search, navigation, placement, transitions can overwhelm persons who may also be experiencing trauma, injury, chronic illness or cognitive limitations. All persons, especially those that are having to navigate a complicated housing application process should be assigned a navigator to assure that any match and referrals are tracked and completed and that any documentation, apartment search, applications are completed and secured so the housing opportunity is not lost and that the resource (e.g., the timestamp on a mainstream housing voucher) and deadlines are met to maximize the value of the voucher.

Rapid Rehousing

- **RRH** – RRH that works more seamlessly with shelter will support reducing the length of stay in shelter. Flexible subsidies rather than mandated terms are found to result in improved exits to housing.
- **Tenancy Supports** – Housing based case management is a needed skill with stages of engagement to result in housing stability and successful exits from programs. RRH staff should be professionally trained in order to support tenants during the changes they are experiencing and to progressively achieve independence.

Permanent Supportive Housing

- **PSH Vacancy Monitoring** – PSH is permanent housing, but there should be occasional turnover as households achieve stability, wellness and independence and able to exit to another long term subsidy (such as HCV). PSH programs must be monitored and evaluated regularly for performance, compliance and demonstrating improvement in client progress. All PSH vacancies must be filled through the Coordinated Entry Housing Priority List process.
- **Recovery-Oriented Housing Model** – Targeted to non-Alliance Health enrolled/service connected persons who are not able to access mainstream vouchers. As PSH is used to house the most vulnerable, acute and chronic homeless, the housing providers will need to adopt housing based case management best practices in supporting clients with a trauma informed housing first approach throughout their tenancy.
- **Development of Permanent Supportive Housing** – Though sometimes difficult, Cumberland County must continue to apply for any HUD COC Program grant opportunities for bonus projects.



- **Development of Affordable Housing** – Any publicly supported affordable housing developments should target units for households whose income falls below 30% AMI in order to have any impact on reducing the homeless population.

System Level Gaps Recommendations

- **Coordination and Collaboration** – Cumberland County is making progress in improving the coordination and collaborations between system providers and local government. Where possible, these collaborations should be spelled out in formal MOUs and MOAs, even where no funding is transacted. These collaborations when formalized can be influential in the HUD CoC Program Grant national competition for additional funding, as well as provide public commitments that are interpreted by other funding and philanthropic potential sources as evidence of a community willing to make commitments to homelessness together with mutual accountability. Subject areas can include workforce development, childcare, facilities, operations, education, etc.
- **HMIS Enhancements** – The more homeless service providers, including non CoC and ESG funded, organizations participate in the HMIS the more the community can coordinate services, find clients, and document outcomes. Where key providers are not participating in HMIS, discussions and negotiations should be pursued, especially to support coordination of services and document homelessness. HMIS Data Quality will be an important component of overall strategic planning efforts providing performance measurements, evaluation tools, and provider accountability.