



HOME-ARP Allocation Plan

Submitted 3/24/2023

The County of Delaware was allocated \$3,732,740 in HOME-ARP funds through the American Rescue Plan Act of 2021 (P.L. 117-2) ("ARP") for the HOME Investment Partnerships Program (HOME) to provide homelessness assistance and supportive services.

HOME-ARP funds may be utilized to perform four activities that must primarily benefit qualifying individuals and families who are homeless, at risk of homelessness, or other vulnerable populations. These activities include:

1. Development and support of affordable housing
2. Tenant-based rental assistance (TBRA)
3. Provision of supportive services
4. Acquisition and development of non-congregate shelter units.

Qualifying populations are defined as:

1. Homeless
2. At risk of homelessness
3. Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking.
4. Other vulnerable populations.

To receive funds, the County is required to prepare this HOME-ARP Allocation Plan to identify unmet needs and gaps in housing and/or service delivery systems while identifying eligible activities currently taking place or being planned. The County's HOME-ARP funds will be administered through the Office of Housing and Community Development (OHCD).

In accordance with the requirements of the HOME-ARP statute at Section 3205 of the American Rescue Plan Act of 2021 as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, this Allocation Plan is informed by input from service providers, community-based organizations, advocates and other stakeholders including:

- Delaware County's Continuum of Care (COC)
- Homeless service providers
- Domestic Abuse Project of Delaware County
- Veteran groups
- Public housing agencies (PHAs)
- Public agencies that address the needs of the qualifying populations
- Organizations that address fair housing, civil rights, and the needs of persons with disabilities.

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

Delaware County recognizes the importance of an effective stakeholder consultation and public participation process to gain information critical to identifying service gaps and priority needs for the qualifying populations in order to use funds to make a meaningful difference with the resources available.

To inform development of the HOME-ARP Allocation Plan, OHCD consulted with a wide range of public and private agencies. Specific outreach and feedback are detailed in the table below and include these efforts:

1. Outreach to the County's Continuum of Care Governing Board on March 1, 2022 to 23 attendees representing 18 organizations and County departments and a preliminary presentation of findings on May 9, 2022.
2. Outreach to the Homeless Services Coalition (HSC) on March 16, 2022, attended by 77 individuals representing 18 social service organizations and 5 County departments. The HSC includes housing providers, mental health organizations, substance abuse treatment providers, domestic violence service providers, homeless service outreach organizations, faith-based organizations, veterans' groups, public housing authorities, the primary youth services organization, the community action agency, the child welfare agency, and the area agency on aging.
3. Outreach at the Housing Task Force on May 13, 2022 attended by 42 individuals representing 32 organizations.
4. Consultations with Delaware County's two (2) public housing authorities. OHCD met with the Chester Housing Authority on May 3, 2022 and Delaware County Housing Authority on January 17, 2023.
5. Outreach to domestic violence service providers included consultation with the Delaware County Victim Assistance Center on February 3, 2023. Consultation with the Domestic Abuse Project of Delaware County (DAP) on March 10, 2023 with additional input through nine (9) survey responses from DAP staff.

To facilitate communication during the consultation process, improve response and identify areas that need improvement, OHCD developed a HOME-ARP survey that was made available to County departments, local nonprofits, housing agencies, housing authorities. The survey instrument, available as an online form, was distributed by email on April 7, 2022 to qualifying population service providers, community-based and advocate organizations through the Homeless Services Coalition contact listserv of more than 175 individuals. Respondents were asked to share the survey with additional relevant contacts. The survey ranked priorities for eligible activities and qualifying populations as well as provided open-ended questions to identify needs/gaps for the Continuum of Care, service delivery, shelter systems and housing inventory. The survey instrument is attached As Appendix A at the end of this document.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Service Provision	Method of Consultation
Aegis residential services	Non-Profit Behavioral Health Disability	Survey
Breaking Bread Community Shelter	Non-Profit Homeless	Homeless Services Coalition 3/16/22
Catholic Social Services	Non-Profit Senior At-risk of housing instability	Survey COC 3/1/22 Homeless Services Coalition 3/16/22
Chester City	Municipality	Fair Housing Task Force 5/13/22
Chester Community Charter School	School District	Homeless Services Coalition 3/16/22
Chester Economic Development Authority	Government	Fair Housing Task Force 5/13/22
Chester Housing Authority	Public Housing	Survey COC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22 Fair Housing Task Force 5/13/22
Chichester School District	School District	Survey
Child Guidance Resource Center	Non-Profit	CoC Governing Board 5/9/22
Community Action Agency of Delaware County, Inc.	Non-Profit Homeless At-risk of housing instability Disability Veteran	Survey COC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22 Fair Housing Task Force 5/13/22
County of Delaware – Adult & Family Services	Government Homeless At-risk of housing instability	Survey Fair Housing Task Force 5/13/22 CoC Governing Board 5/9/22
County of Delaware – Children & Youth Services	Government Youth Homeless At-risk of housing instability	Survey COC 3/1/22 Homeless Services Coalition 3/16/22 Fair Housing Task Force 5/13/22 CoC Governing Board 5/9/22
County of Delaware – Services for the Aging (COSA)	Government Senior	Survey
County of Delaware – Department of Human Services	Government Homeless At-risk of housing instability Disability Veteran	Survey COC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22 Fair Housing Task Force 5/13/22
County of Delaware – Victim Assistance Center	Domestic/dating violence Sexual assault Stalking Human trafficking	Consultation 2/3/2023 Survey
Delaware County Housing Authority	Public Housing	Consultation 1/17/2023 COC 3/1/22 Homeless Services Coalition 3/16/22

		CoC Governing Board 5/9/22 Fair Housing Taskforce 5/13/22
Domestic Abuse Project of Delaware County	Non-Profit Domestic/dating violence Sexual assault Stalking Human trafficking	Consultation 3/10/23 Survey CoC Governing Board 5/9/22
Haverford Township	Municipality	Fair Housing Taskforce 5/13/22
EDSI Delaware County	Workforce Development	Homeless Services Coalition 3/16/22
Elwyn	Non-Profit Disability; At-risk of housing instability	Survey
Fair Acres Geriatric Center	Government Senior	Survey
Family & Community Service of Delaware County	Non-Profit Homeless At-risk of housing instability Behavioral Health	COC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22
Horizon House, Inc	Non-Profit Homeless At-risk of housing instability	Survey COC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22
Housing Equality Center of PA	Non-Profit Civil rights Fair housing	Survey Homeless Services Coalition 3/16/22 Fair Housing Task Force 5/13/22
Legal Aid of Southeastern PA	Non-Profit Civil rights Fair housing	Survey Homeless Services Coalition 3/16/22
Maternity Care Coalition- Healthy Families America	Non-Profit Health	Survey Homeless Services Coalition 3/16/22
Mental Health Partnerships	Non-Profit Homeless At risk of housing instability	Survey COC 3/1/22 Homeless Services Coalition 3/16/22
Merakey	Behavioral Health At-risk of housing instability	Survey Homeless Services Coalition 3/16/22
Natale Media Program	Non-Profit Crisis residential Disability At-risk of housing instability	Survey
Reliable Best Care	Senior	Survey
Society of St. Vincent DePaul	Non-Profit At-risk of housing instability	Survey
Southeast Delco School District	School District	Survey
Taylor Made Vets	Veteran	Survey
The Foundation for Delaware County	Non-Profit At-risk of housing instability Health	Survey COC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22 Fair Housing Task Force 5/13/22
The Salvation Army	Non-Profit	Survey

	Homeless At-risk of housing instability Disability Veteran	CoC 3/1/22 Homeless Services Coalition 3/16/22 CoC Governing Board 5/9/22 Fair Housing Task Force 5/13/22
United Way	Non-Profit Homeless At-risk of housing instability	CoC Governing Board 5/9/22
Valley Youth House	Non-Profit Civil rights Fair housing At-risk of housing instability	Survey
Values Into Action	Non-Profit Disability	Fair Housing Task Force 5/13/22

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

Consultation

OHCD conducted a robust consultation process to inform the development of the HOME-ARP Allocation Plan. For this effort, OHCD solicited input and recommendations from county agencies, stakeholders and organizations that serve and represent the Qualifying Populations, including those with lived experience. The consultation process included participation from 14 government agencies and 25 organizations.

Specific input received from consultations included:

- There is a shortage of shelter beds for all populations.
- The need for more affordable housing in safe, desirable neighborhoods.
- The need for shelter space that can accommodate family households, domestic violence victims, LGBTQ+ individuals, households with pets, individuals with mental and/or behavioral issues, and disabled seniors.
- Requests for non-congregate shelter space.
- Concern about the number of evictions following the end of pandemic-related Emergency Rental Assistance Program (ERAP).
- A Temporary Emergency Shelter to assist with the County's Cold Weather Plan shelter was set up at the County-funded Breaking Bread facility which is currently in development.
- Chester Housing Authority requested support with development of new rental properties and upgrade of owned and managed existing properties.
- Delaware County Housing Authority requested support with upgrading existing owned and managed rental properties. DCHA also is looking to provide accommodations for individuals with physical disabilities.

Survey Results

The HOME-ARP Survey was completed by 61 individuals at 22 service provider organizations, six (6) county agencies, one (1) public housing authority, and two (2) school districts.

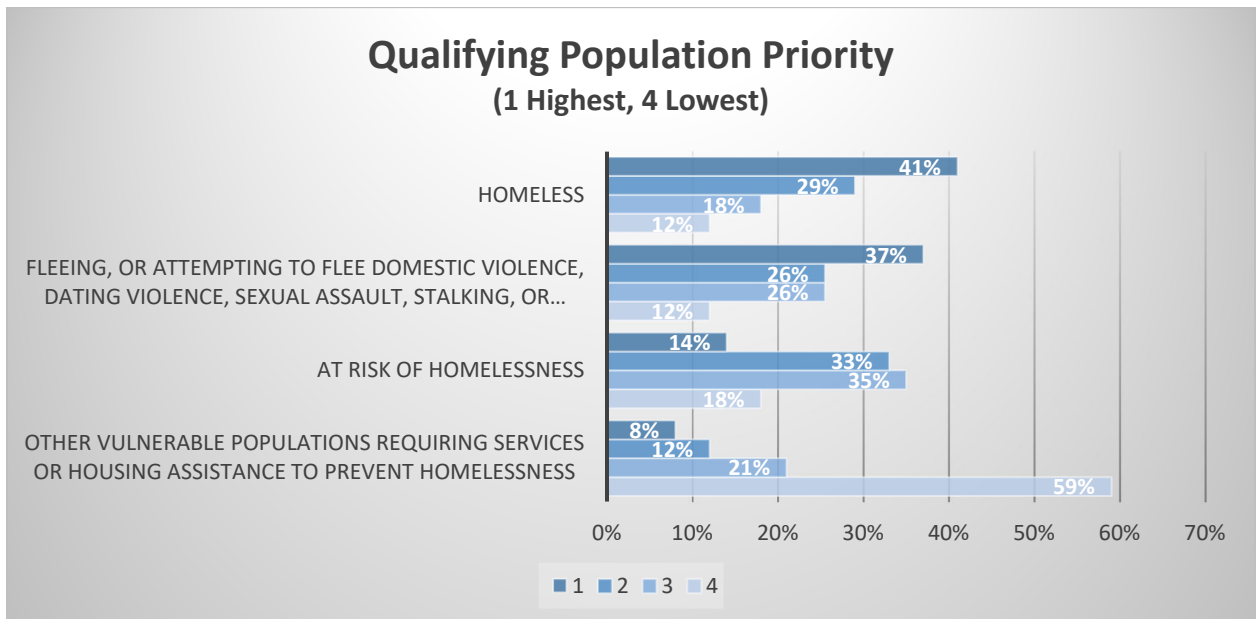
Of the survey respondents, 76% are residents of Delaware County and 98% work in or provide services in the county. Fifteen (29%) have lived experience of homelessness.

The majority of respondent's report that individuals have difficulty accessing emergency shelter. More than half (53%) state it is very difficult or difficult to get into a shelter and 25% state it is somewhat difficult while only 8% state it is easy or somewhat easy. Sixteen percent (16%) of respondents do not know how difficult it is to enter shelter services.

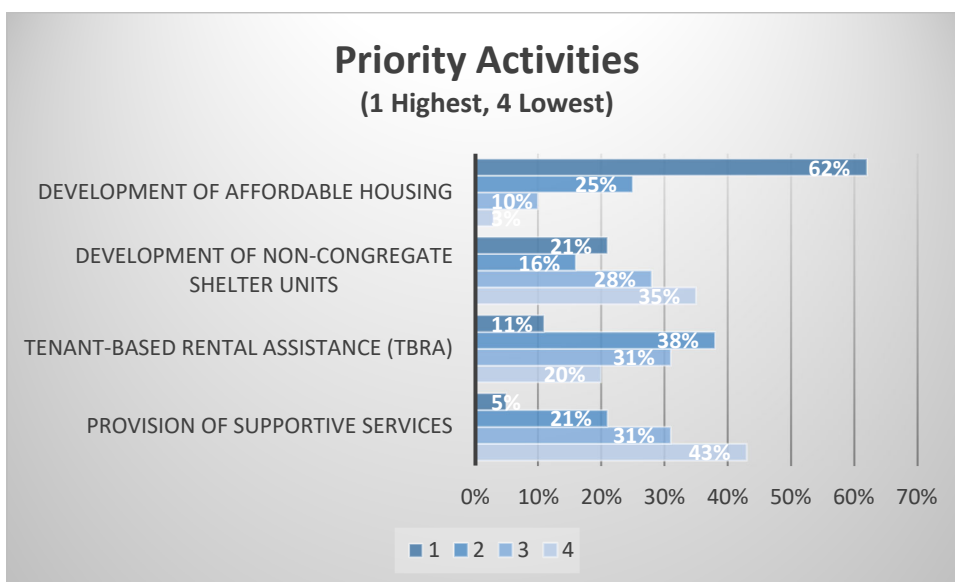
Survey respondents ranked the priority of the four qualifying populations. In order of highest priority, responses were Homeless (41%), Violence/Assault/Trafficking (37%), At-Risk of Homelessness (14%) and Other Vulnerable Populations (8%). Refer to *Graph 1: Qualifying Population Priority* for complete responses.

Survey respondents also ranked the priority of potential HOME-ARP-funded activities. The majority of respondents selected the Development of Affordable Housing (62%) as the greatest priority followed by Non-Congregate Shelter (21%), Tenant-Based Rental Assistance (11%), and the Provision of Supportive Services (5%). Refer to *Graph 2: Priority Activities* for complete responses.

Graph 1: Qualify Population Priority



Graph 2: Priority Activities



The survey included open ended questions regarding what needs or gaps exist for the qualifying populations regarding the 1) Continuum of Care, 2) Service Delivery System, 3) Shelter System, and 4) Housing Inventory. Detailed survey responses are included in Appendix B. Most frequent responses included:

1) Continuum of Care

- More shelter beds needed.
- Improve and diversify access to the Coordinated Entry system, including having more than one (1) service provider for Coordinated Entry.
- Add an online application and modernize access to the Coordinated Entry system.
- Increase shelter and case management staffing, training and funding.
- Eviction prevention services and funding are needed to reduce homelessness.

2) Service Delivery

- Improve awareness of and access to programs and resources.
- Improve efficiency of accessing the service delivery system.
- Provide better salaries to retain quality and trained staff.
- Provide additional staff development and training to facilitate outreach and service delivery.
- Increase services for intellectually disabled, mental/behavioral health, and substance abuse populations.
- Increase self-sufficiency education and services.

3) Shelter System

- Provide non-congregate shelter.
- Add additional providers/shelters and find creative solutions.

- Add shelters that can accommodate families without separating husbands/fathers from their families.
- Add a shelter for LGBTQ+ population.
- Add shelter beds for victims of domestic violence and abuse.
- Decrease the amount of time it takes to re-home individuals in shelters.

4) Housing Inventory

- Lack of affordable housing, particularly in safe and desirable neighborhoods.
- Cost of living and rent burden are significant issues that make it hard to find/keep housing.
- Eviction prevention assistance services are needed.
- Credit score and large down-payment requirements can prevent qualified populations from accessing affordable housing.
- Lack of landlords willing to accept Vouchers or participate in programs.
- Concern regarding monopolies on the ownership of properties.
- Concern regarding the poor physical condition of properties.

Conclusions

The County is committed to allocating HOME-ARP funding in response to the priorities identified during the allocation planning process. The consultation process included meetings with stakeholders, opportunities for local task forces to provide input and/or ask questions, and the use of a survey instrument.

Consultations indicated the need for shelter space that can accommodate specialized populations such as families, domestic violence victims, and LGBTQ+ individuals. Additionally, public housing agencies requested assistance with the provision of additional units of affordable housing and upgrades to existing units.

Through the consultation process, OHCD explored possible solutions for the provision of emergency non-congregate shelter units such as the adaptive re-use of motels and modular options including refurbished shipping containers and tiny homes.

Survey responses quantified the greatest qualifying population priority as Homeless and the greatest priority activity as the Development of Affordable Housing. Consultations identified the priority needs for each Qualifying Population including the addition of affordable housing and the creation of non-congregate shelter beds.

Public Participation

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

- Date of Public Notice: 3/8/2023 (Copied in Appendices below)
- Public Comment Period: 3/8/2023 - 3/24/2023
- Date of Public Hearings: 3/14/2023 and 3/20/2023

In accordance with HOME-ARP guidance and the County's Citizen Participation Plan, the County encouraged citizen participation in the development of the HOME-ARP Allocation Plan through the opportunity for the public to comment on the proposed plan. The proposed plan included the amount of HOME-ARP funding available to the County and the range of proposed activities and priorities.

OHCD adhered to applicable fair housing and civil rights requirements and procedures for effective communication, accessibility and reasonable accommodation for persons with disabilities and meaningful access to participation by limited English proficient (LEP) residents.

The proposed draft plan was available for review on OHCD's website and was available in print copy upon request. Translation services were available upon request.

Residents and the public were provided with reasonable notice of 15-days to review and comment with feedback or plan amendments. A public hearing was held on March 20, 2023 and public comments were accepted at the County Council agenda meeting on March 14, 2023. During all consultation sessions and the public hearing, the County provided information on the qualifying populations to be served by HOME-ARP as well as all eligible activities that could be funded.

Describe efforts to broaden public participation:

Notice of the draft plan and public hearing was posted on the County's website beginning 3/8/2023 and in the Philadelphia Inquirer – Delaware County Edition newspaper on 3/8/2023. Additional notification was provided to service providers and stakeholders at the 3/15/2023 Homeless Services Coalition meeting.

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

The following comments and recommendations were received through the public participation process:

- Multiple attendees stated there is need for increased case management and wrap-around services to support sheltered persons and find permanent housing.
- Some municipalities are more supportive than others regarding the physical location of an emergency shelter. To access employment opportunities, medical and other resources, it can be helpful for an emergency shelter to be located near a transportation hub.
- Some individuals and families in need of shelter are not willing to go a shelter in the City of Chester.
- A question was asked regarding how the County will market the Request for Proposals for the use of HOME-ARP funds. The County representative stated that the RFP will be advertised according to local and federal rules.
- A question was asked as to how the County can incentivize municipalities to support the location of an emergency shelter. The County representative stated that the RFP selection process may include priority points for a location in a high opportunity zone.
- There was a general discussion regarding possible solutions regarding the provision of non-congregate shelter. The County clarified HUD's definition of non-congregate. Attendees suggested Tiny Homes or the renovation of a motel or nursing home as a shelter.
- An attendee commented that with current high interest rates, banks/lenders such as the Federal Home Loan Bank have additional revenue that could possibly be directed towards the provision of affordable housing.

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

All comments and recommendations were accepted.

Needs Assessment and Gaps Analysis

In accordance with HOME-ARP guidance, OHCD evaluated the size and demographic composition of each qualifying population and assessed the unmet needs of each population. In addition, OHCD identified gaps within the County's current shelter system and housing inventory and service delivery system.

Data sources used included the most recent available Point-In-Time count (PIT), Housing Inventory count (HIC), and other data available through the CoC. Data and information provided through consultations with service providers was used to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

Table 1: Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population (Individuals/Households)				Gap Analysis			
	Family		Adults Only		Vets	Family - at least 1 child	Adult (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Unit s
Emergency Shelter	167	51	161	#	#								
Transitional Housing	46	24	33	#	#								
Permanent Supportive Housing	150	55	265	#	93								
Other Permanent Housing	#	#	#	#	#								
Sheltered Homeless						182/48	107/103	6	21				
Unsheltered Homeless						0/0	46/46	2	0				
Current Gap										15	-	13	-

Data Sources: 2022 Point in Time Count (PIT), 2021 PIT (Veteran data); 2020 Continuum of Care Housing Inventory Count (HIC), Consultation

Table 2: 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	64,965		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	15,500		
Rental Units Affordable to HH at 50% AMI (Other Populations)	10,805		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		32,710	17,210
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		14,475	3,670
Current Gaps			20,880

Data Sources: American Community Survey (ACS), Comprehensive Housing Affordability Strategy (CHAS) 2014-2018

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

HOME-ARP funds are required to be used to primarily benefit individuals and families in specified HOME-ARP "qualifying populations." As defined in 24 CFR 91.5, qualifying populations include, but are not limited to, the following:

1. Homeless
2. At risk of homelessness
3. Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking.
4. Other vulnerable populations.

Sources for Qualifying Population size and demographic data include the PY 21 CAPER, the 2018-2022 Consolidated Plan, and the 2021 and 2022 Point-In-Time Counts.

1. Homeless

In accordance with HUD's definition of homeless under the HOME-ARP grant, homeless is defined as:

- An individual or family who lacks a permanent and adequate permanent home
- A person or family who will imminently lose their permanent home due to a lack of resources or support
- A youth under the age of 25, even if accompanied by an adult, that does not have a permanent home.

In FY 21, 437 homeless individuals were served at emergency shelters in Delaware County. Of these, 91 homeless individuals were served at the Life Center shelter; 68 homeless households comprised of 217 persons were served at the Wesley House shelter; and 71 homeless households comprised of

129 homeless women and children who were victims of domestic violence were served at the Domestic Abuse Project shelter.

The PIT Count indicates that, on the night of February 22, 2022, there were a total of 151 households in emergency shelters or transitional housing and 46 households were unsheltered. Eight (8) individuals are chronically homeless, 5 of whom were unsheltered. The majority of the priority unsheltered individuals (78%) were male.

There were no unsheltered families as it is a County goal is to ensure that no homeless families are without shelter. In addition to diversion strategies, the County operates a limited Temporary Emergency Shelter Program that utilizes hotel/motel vouchers for families and vulnerable adults when no shelter beds are available. The majority of families with children in need of assistance are female headed households with limited incomes. Of the 335 persons who were homeless that day, 34% were children under the age of 18.

Nearly 58% of the homeless identified were over the age of 24, including 100% of the unsheltered individuals and 34% were under age 18. All of those under age 18 were residing in sheltered situations. The remaining 8% of the persons counted were between the ages of 18 and 24. While more than half (53%) of the total homeless population identifies as female, the unsheltered population identifies as majority male (78%).

Overall, 60% of the identified homeless were Black and 30% White. Of the unsheltered population, 70% were Black. The majority (94%) of the homeless population considered themselves non-Hispanic. Compared to the County's overall population of which approximately 22% is Black (according to the 2021 ACS), people of color are disproportionately represented in the homeless system.

2. At Risk of Homelessness

HUD defines those at risk of homelessness as individuals and families who have an income below 30% of the area median income (AMI), do not have sufficient resources or support networks to prevent them from becoming homeless, or live with instability, such as moving two or more times during the last 60 days due to economic reasons.

According to HUD's 2014-2018 CHAS data, 12% (24,790) of Delaware County's 206,405 households have incomes at or below 30% AMI. Of these, 63% are renter households and 80% (19,675) have one or more housing problems. Housing problems may include housing cost burden, overcrowding, lack of kitchen facilities, and/or lack of plumbing facilities. These households are considered at risk of becoming homeless.

Data from the Delaware County Housing Authority's 2022 Annual Plan indicates that 72% of the households on their waiting lists are very low-income (\leq 30% AMI) and 20% are low-income (between 30-50% AMI.) Of the total households on the waitlists, 74% are families with children, 17% are disabled, 86% are Black and 7% are Hispanic. While the total number of households on DCHA's waitlist is difficult to determine because DCHA maintains separate lists for each of its properties, it is stated in the County's Consolidated Plan that there are more than 30,000 households on the waitlist.

DCHA reports that there are more than 11,000 households waiting for tenant-based rental assistance housing vouchers. Of these, 76% are very low-income and 20% are low-income.

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

For HOME-ARP, this population includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. It includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to 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 or remain within the same dwelling unit. Domestic violence can be physical abuse, as well as emotional, psychological, financial, sexual, or a combination of many forms.

Delaware County has one primary provider for the shelter and support of individuals who are fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking. The Domestic Abuse Project safe house emergency shelter provides for up to 11 families at a time and consistently has a 100% utilization rate, with length of stay up to 30 days. In the current housing market, it is becoming increasingly difficult to place clients in permanent housing within the 30-day limit. Survivors and children that need emergency shelter when the Safe House is 100% occupied are provided hotel vouchers for safe accommodations.

In FY 21, DAP's hotline received 3,317 calls. The agency provided shelter services to 71 households comprised of 129 homeless women and children who were victims of domestic violence, dating violence, sexual assault, stalking or human trafficking. All 71 households were female headed. The majority (96%) of the household individuals identify as non-Hispanic and 80 (62%) were American Indian/Alaskan Native or Native Hawaiian/Other Pacific Islander. Of the individuals served, 116 (90%) are extremely low-income with incomes below 30% AMI.

The Delaware County Victim Assistance Center provides comprehensive services to victims of crime including sexual assault. In 2021, the hotline received 2,503 calls and provided direct services related to sexual assault to 1,557 individuals.

Due to under reporting, it is difficult to know the overall number of individuals experiencing domestic/dating violence, sexual assault, stalking or human trafficking. As reported in OHCD's most recent Consolidated Plan, it is estimated that approximately only 10% of the population seek services from DAP or other service providers in the County.

Underserved communities within this population in Pennsylvania as identified by the Pennsylvania Coalition Against Domestic Violence include people with a disability, people of color, refugee and immigrant residents, those identifying as LGBTQ+, and male survivors.

4. 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

HOME-ARP qualifying populations also include other populations who have previously qualified as homeless, are currently housed with temporary or emergency assistance, and those who need additional housing assistance or supportive services to avoid a return to homelessness. In addition, HUD defines those at greatest risk of housing instability as households that have an annual income less than 30% AMI and are experiencing severe cost burden or have an income less than 50% AMI and meet a certain condition, such as living in someone else's home or living in a hotel due to an economic hardship.

Cost burden and severe cost burden are the most significant factors linked to instability and an increased risk of homelessness. Cost Burden is defined as spending more than 30% of household income spent on housing costs and Severe Cost Burden is defined as spending more than 50% of household income on housing costs. CHAS (2018) data shows that of all households in the County, 31% are faced with housing cost burden and 14% are severely cost burdened. While this includes both homeowners and renters, renters within the County make up the largest population experiencing housing cost burden. Almost half (46%) of the County's total renter population experiences housing cost burden, and 23% experience severe cost burden. The relative numbers increase as income declines. For renters At-Risk of homelessness (incomes less than 30% AMI), 77% are cost burdened and 68% are severely cost-burdened. Similarly, cost burden for At-Risk homeowners is similar with 81% of the lowest-income homeowners experiencing cost burden and 66% severely cost burdened. Of the total homeowners in the County, 24% experience cost burden and 10% severe cost burden. Residents with the lowest incomes predominately experience cost burden and severe cost burden issues.

According to HUD's 2014-2018 CHAS data, 12% (24,790) of Delaware County's 206,405 households have incomes at or below 30% AMI. Of these, 63% are renter households and 80% have one or more housing problems such as cost burden, overcrowding, lack of kitchen facilities, and/or lack of plumbing facilities. Severe cost burden (more than 50% of a household's monthly income spent on monthly housing costs) is experienced by 14% of the County's households.

According to the National Low-Income Housing Coalition Out of Reach Study (2022), Delaware County has 65,658 renter households and a monthly affordable rent at 30% of the AMI is \$791. ACS 2021 data indicates 65,658 occupied rental units with 55% of these households paying more than 30% of their monthly income to rent.

The Delaware County Emergency Rental Assistance Program (ERAP) processed 12,889 grants for rent and/or utility assistance. On average, households received \$5,755 to cover costs for 9.75 months. These households had experienced a loss of income or were struggling to pay rent and/or utilities because of impact by the COVID-19 pandemic. The average household income of participants was \$23,155. The majority (86%) of grant funds distributed benefitted households earning 50% AMI or less; more than half (54%) benefitted households earning 30% AMI or less.

Delaware County's most recent Consolidated Plan (2018-2022) defines additional property characteristics associated with instability and increased risk of homelessness to include the age and condition of the physical property. The majority (74%) of Delaware County's housing stock was built

before 1970 and issues such as lack of maintenance, older windows, leaking roofs and aging heating systems add to the cost burden of the County's low- and very low-income populations and increases the likelihood that residents of these properties will become At-Risk of homelessness.

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:

The County recently created a Housing Workforce Committee to collaborate with community partners and stakeholders in the provision of affordable housing, particularly in relation to meeting the needs of the homeless and at-risk of homelessness. The Workforce met for the first time in February 2023 and is tasked with the goal of identifying actionable items to address housing needs for the County's homeless, at-risk of homelessness and other vulnerable populations.

Another group, the Homeless Services Coalition, includes County departments and social service organizations and meets quarterly to share resources and improve communication in meeting the needs of the County's homeless and At-Risk populations.

Funding

The Delaware County Continuum of Care (CoC), serving urban Delaware County and the HUD entitlement areas of Upper Darby, Chester City and Haverford was awarded \$5.38 million in 2021 to provide Emergency Shelter, Rapid Rehousing, Transitional Housing, Permanent Supportive Housing and related supportive services.

Delaware County receives an annual allocation of federal dollars to increase access to safe, decent and affordable housing, supportive services, public facilities, emergency shelter facilities and other services for the county's moderate- and low-income households. In PY 21, \$7,844,653 in federal funding was expended through the Community Development Block Grant (CDBG), Home Investment Partnerships (HOME), and Emergency Solutions Grant (ESG) programs. Federal expenditures included \$5,411,720 in annual entitlement funding, \$2,136,047 in CARES funding, \$292,451 Lead Hazard Control Grant funding and \$4,435 in State ESG funds. CARES funding was expended through the CDBG-CV and ESG-CV programs in response to Covid-19-related impact.

In addition, the following local public funding was expended in PY 21 to support of the County's activities to assist moderate- and low-income population.

- County of Delaware Act 137 Funds (AHF) \$ 1,698,441
- Local Demolition Funds \$ 716,562
- Local Government \$1,891,845

Pandemic response measures included assistance to renters, homeowners, and social service agencies:

- The Emergency Rental Assistance Program (ERAP) provided \$82.9 million rent and/or utility assistance for 12,889 grants and related program administration costs. The program provided

- rent and utility assistance to households who are at risk of losing their housing or experiencing utility shutoffs due to the financial impact of the COVID-19 pandemic.
- The Delco CARES Homeowner Assistance Program assisted homeowners impacted by pandemic-related economic hardship. Using CDBG-CV funds from the federal Coronavirus Aid, Relief, and Economic Security (CARES) Act, Delco CARES provides eligible Delaware County homeowners with up to three (3) months of mortgage and/or utility payment assistance up to \$6,000 total. To date, 128 households have been assisted for a total of more than \$600,000 of mortgage and utility payments.
- Over \$350,000 in Delco Impact Grants were awarded to social service agencies experiencing increased demand for services in response to the pandemic.

Shelter Resources

Within the emergency and transitional housing facilities, the 2021 Housing Inventory included 308 Emergency Shelter beds, 201 Rapid Rehousing beds, 79 Transitional Housing beds and 403 Permanent Supportive Housing beds.

There are five (5) emergency shelters serving the county. The Eastern Life Center of Delaware County and Salvation Army provides emergency shelter to single adults. The Family Management Center serves families with children, and the Wesley House Community Corporation serves families with children and single women. The Domestic Abuse Project of Delaware County serves victims of domestic violence and their dependent children.

The Breaking Bread shelter is currently operating as a Temporary Emergency Shelter providing overnight shelter for seventeen single adults. Construction finding to operate as an emergency shelter is being secured and is anticipated in Spring 2024, providing 30 beds serving single adults with wrap around services including case management. The rooms will be congregate and can accommodate pets.

Shelter resources became significantly strained since 2020 with the closing of Connect-by-Night and Family Promise of Delaware County.

Voucher Assistance

The County provides rapid rehousing using the Housing First approach and tenant-based vouchers including Emergency Housing Vouchers, Elderly/Disabled vouchers, Family unification and Veterans vouchers in addition to Mainstream Vouchers.

As of February 2023, Delaware County Housing Authority (DCHA) has the following vouchers under lease:

- 2,392 Mainstream
- 43 Emergency Housing
- 61 Elderly/Disabled
- 104 Family Unification
- 57 Veteran's Assistance

Affordable Housing Inventory

There are 4,134 units of affordable rental housing on Delaware County's current Affordable Housing Inventory, of which 2,271 are private/non-profit owned and operated and 1,863 are public housing units. Of the total units, 1,312 are age-restricted and 467 are accessible. County investment in affordable senior housing recently increased with the addition of 231 units of senior housing at Simpson Gardens II, Makemie Court, St. Josephs Place and Kinder Park IV.

DCHA serves 705 households in public housing with an additional 231 households receiving project based rental assistance, and 2,879 households receiving Section 8 tenant based rental assistance. They also have over 30,000 households on their waiting list demonstrating a great need for more affordable housing. Of the residents currently waiting for DCHA assistance, the majority (73%) are very-low income and 20% are low-income at 30% or less of Area Media Income (AMI). This is especially true for the families with children which make up the highest number of households served by the DCHA and on their waiting lists.

Homeownership Assistance

The County helps low-income homeowners stay in their homes by funding critical repairs programs. In partnership with Habitat for Humanity, the County works to preserve existing homeownership housing stock by helping 15-20 households per year to make major systems repairs.

The County was allocated more than \$4.5 million in PA state ARPA funding to operate a Whole Home Repair Program. The County is currently soliciting proposals to operate the program and secure wrap around services providing financial literacy. The County expects to begin accepting applications for the program in summer 2023. Assistance of up to \$50,000 will be provided for approximately 80 income-eligible households, preserving homeownership and contributing to the stabilization of the County's aging housing stock.

The supply of affordable homeownership opportunities in desirable locations is being increased through a land conservatorship program partially utilizing HOME CHDO funds. This program is in a pilot phase, with four (4) single-family properties going through the process. Properties assisted with HOME funds will be restricted to buyers at or below 80% median family income.

Describe the unmet housing and service needs of qualifying populations:

Of the County's 206,405 households as reported in the 2018 CHAS, 12% (24,790) are very-low income, and of these 63% are renters. Approximately one third (32%) of total households and almost half (46%) of renters experience at least one (1) housing problem and 16% experience severe housing problems. Almost one third (31%) of all Delaware County households are cost burdened, meaning that monthly housing costs including utilities exceeds 30% of the household's monthly income and 14% (29,500) of households are severely cost burdened, paying more than 50% of their monthly income towards housing costs.

Factors such as the COVID-19 pandemic-related housing market bubble and the related rapid increase of rental and homeownership housing costs, inflation, and the State's low minimum wage have

exacerbated the cost burden for the County's low-income households and increased the number of at-risk of homelessness residents.

Survey and consultation responses for Qualifying Populations identified the need for an increased amount of affordable housing as a means of reducing the likelihood of households becoming homeless or at-risk of homelessness.

The need for affordable housing is quantified by the waitlists for public housing and vouchers. DCHA has over 30,000 households on their waiting list demonstrating a great need for more affordable housing. Of the residents currently waiting for DCHA assistance, the majority (73%) are very-low income and 20% are low-income at 30% or less of Area Media Income (AMI). This is especially true for the families with children which make up the highest numbers of households served by the DCHA and on their waiting lists.

Many social service organizations serving the Qualifying Populations have seen an increase in demand for services since the onset of the pandemic. The County awarded \$383,389 in Delco Impact Grants to six (6) organizations to address the increase needs of pandemic-related services.

The housing and service needs of each Qualifying Populations are detailed below.

Homeless

- Improve access to the County's Coordinated Entry system. Suggestions include having more than one service provider, more convenient location(s) for intake assessments, and creating an online registration and referral system.
- Increase the number of shelter beds to reduce the likelihood of turning households away. Emergency Shelter, Temporary Shelter and Permanent Supportive Housing operate at capacity and maintain waitlists.
- Provide non-congregate shelter units to accommodate specific populations, allow households/families to be housed together, and minimize exposure to viruses.
- Increase the supply of Permanent Supportive Housing for households with children and single adults.
- Extend the duration of Permanent Supportive Housing rental assistance. Many households need more than the 24 months of rental assistance provided currently.
- Increase resources for intensive case management and other services such as housing navigators, job training and employment services.

At Risk of Homelessness

- Provide additional Housing Choice Vouchers including for Disability and Veteran households.
- Increase eviction mediation and foreclosure prevention services.
- Provide rent/mortgage and utility assistance.
- Increase availability of rapid rehousing units to prevent households from entering the homeless system as well as to rapidly rehouse those experiencing homelessness.
- Increase other types of supportive services to prevent households from becoming homeless.
- Increase the supply of affordable housing units.

- Provide landlord education on vouchers and other forms of assistance to reduce source of income discrimination.
- Expanded supportive services and outreach for individuals experiencing substance abuse, chronic illness, mental/behavioral health
- Critical repairs and rehabilitation assistance for homeowners, such as roof, sewer lateral and furnace repairs/replacements.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

- Increase the number of shelter beds for domestic abuse victims by adding non-congregate units that can adequately assist the population and, in particular, accommodate families with children and LGBTQ+ persons. The current dormitory style beds with shared baths and shared kitchen is not considered suitable given trauma-informed practice.
- Increase resources to extend the maximum length of stay beyond 30 days if necessary. It is becoming harder and harder to find housing within the current 30-day period.
- Provide resources and find housing for special populations such as undocumented immigrants, LGBTQ+ individuals and clients with mental health issues.
- Increase the supply of affordable housing. The largest unmet need for the DV population is available permanent affordable housing that clients in the emergency shelter and transitional housing facilities can be placed into. Even with supportive services and wrap-around assistance, the obstacles to finding permanent housing are high.
- Identify landlords willing to accept rapidly rehoused individuals.
- Increase the number of skilled case managers. Staff turnover is high and there is a shortage of skilled case managers, especially in programs that offer job training and childcare assistance
- Increase services providing job training and childcare assistance for DV population to access job opportunities and achieve economic independence.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

- Provide funding for special population vouchers including family unification, non-elderly disabled and veterans.
- Rent/mortgage and utility assistance for an indefinite period of time in order to allow households to remain housed.
- Improve access to opportunity. High housing costs can have a greater impact on families with children who need multiple bedrooms and individuals with disabilities who need accessible housing or housing located close to accessible transportation.
- Increase job and educational training to improve housing stability outcomes.
- Identify landlords willing to accept Housing Choice Vouchers and/or SSI and SSDI payments.
- Provide programs and services to improve financial literacy and credit scores.
- Increase housing counseling services.
- Provide funding to support construction of rental units accessible to persons with physical disabilities.

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

The primary gaps in the system are:

- 1) Insufficient affordable rental housing.
- 2) Insufficient number of shelter beds.
- 3) Lack of non-congregate shelters.
- 4) Insufficient resources to prevent homelessness.

Table 1: Homeless Needs Inventory and Gap Analysis (p. 11) shows there are 167 Emergency Shelter beds in 51 units for families and 161 beds for single adults in the County. On the night of the 2022 PIT count, there were 182 family members in 48 households and 107 single adults that were sheltered and 46 unsheltered. All the unsheltered were single adults. There was a gap of 15 family beds and 13 adult beds. Survey and consultation input confirms the need for additional shelter units, in particular to accommodate family households and individuals in a non-congregate setting.

Table 2: Housing Need Inventory and Gap Analysis (p. 12) shows there are 64,965 rental units in Delaware County, of which 15,500 units are affordable to households At-Risk of Homelessness (with incomes at/below 30% AMI) and 10,805 units are affordable to households with incomes at 50% AMI and are likely to include Other Qualifying Populations. Of the total renter households with one (1) or more severe housing problem, 32,710 are At-Risk of Homelessness (at/below 30% AMI) and 14,475 are at/below 50% AMI. Overall, there is a gap of 20,880 units of rental unit housing for the County's low-income renters, with a gap of 17,210 units for the At-Risk of homelessness population.

While 30 beds of Emergency Shelter for single adults will be added with the opening of Breaking Bread Shelter, the shelter system lost more than 30 beds due to the closing of Connect-By-Night and Family Promise of Delaware County. Additionally, the Eastern Life Center is still not operating at full-capacity due to social distancing needs and staff shortages. Overall, there are less emergency shelter bed available currently than there were before Connect-By-Night and Family Promise stopped operating in 2020.

The use of motel stays during the pandemic to provide socially distanced emergency shelter accentuated the need for non-congregate shelter options to safely house individuals and families without exposure to COVID-19 or other viruses. Additionally, feedback from providers and system users indicates that non-congregate accommodations are preferred. Previously, limited resources were available for motel stays to address emergency shelter needs, particularly to house family units when shelters were at capacity. The County's shelter facilities currently offer zero (0) non-congregate options.

Survey and consultation responses for all Qualifying Populations state the need for more affordable housing. This is quantified by the waitlists for units and vouchers at DCHA and CHA. DCHA has over 30,000 households on their waiting lists. In particular, there is need for units that accommodate families in safe and desirable neighborhoods.

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:

Delaware County’s most recent Consolidated Plan (2018-2022) defines additional property characteristics associated with instability and increased risk of homelessness to include the age and condition of the physical property in the county.

The majority (74%) of Delaware County’s housing stock was built before 1970 and lack of maintenance, older windows, roofs, heating systems, etc. add to the cost burden of the County’s low- and very low-income populations and increases the likelihood that residents of these property will become At-risk of homelessness. These issues are exacerbated by declining household income, the pandemic and inflation related costs of housing repair services and materials. The high cost of housing coupled with the older age of the housing stock can lead to maintenance issues and additional housing burdens like substandard housing. This adversely affects the lowest income populations whose incomes do not allow for maintenance or increased housing costs.

The rental stock in Delaware County is also older, with the median rental unit constructed in 1958. Aging rental structures may be in poor condition and expose households with few options to substandard living conditions. Additionally, many rental units do not have enough bedrooms to accommodate larger households, thus increasing the likelihood of crowding.

Identify **priority** needs for qualifying populations:

Priority needs were identified through the consultation process and those relevant to all Qualifying Populations include:

1. Increase the supply of affordable rental housing.
2. Provide non-congregate shelter beds/units.

Additional priority needs relevant to specific Qualifying Populations include:

Homeless

- Improve access to the County’s Coordinated Entry system.
- Increase the overall number of shelter beds.
- Extend the duration of Permanent Supportive Housing rental assistance.
- Increase resources for intensive case management and other related services.

At Risk of Homelessness

- Increase eviction prevention resources including landlord mediation, long-term rent/utility assistance, employment training and access to childcare.
- Increase supply of Housing Choice Vouchers.
- Identify landlords willing to accept vouchers.
- Increase housing and credit counseling resources and services including budgeting and renter/homeowner training.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking

- Add non-congregate shelter units to more adequately meet the needs of trauma victims.
- Increase beds and resources to meet the needs of families with children, LGBTQ+ persons, undocumented immigrants and persons with mental/behavioral health issues.
- Increase availability of affordable housing for the rapid placement of victims.
- Identify landlords willing to accept individuals receiving rapid rehousing assistance.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability

- Increase eviction prevention resources including landlord mediation, long-term rent/utility assistance, employment training and access to childcare.
- Increase job and educational training and access to childcare to improve housing stability outcomes.
- Increase housing and credit counseling resources and services including budgeting and renter/homeowner training.
- Provide critical repairs and rehabilitation assistance to allow homeowners to remain housed.

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:

Needs and gaps in the County's shelter and housing inventory and service delivery systems were determined by an analysis of the data presented in this plan and input from the organizations consulted.

Presentations to the CoC, Homeless Services Coalition, and Fair Housing Task Force and feedback from the HOME-ARP survey were utilized to provide organizations with the opportunity to indicate priorities and needs for the qualifying populations. Additionally, OHCD consulted with the County's public housing agencies and domestic abuse service provider.

Priorities were identified based on a consensus approach taking into consideration input from all sources.

HOME-ARP Activities

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

The County will utilize a request for proposals (RFP) process to solicit competitive proposals (including turn-key proposals for development) where the County determines that conditions are not appropriate for the use of sealed bids.

The RFP will clearly identify the relative importance of price and other evaluation factors and subfactors including qualifying factors associated with HOME-ARP funding. A mechanism for fairly and thoroughly evaluating the technical and price proposals will be established before the solicitation is issued. Proposals will be handled to prevent disclosure of the number of offerors, identity of the offerors, and the contents of proposals. The proposals will be evaluated only on the criteria stated in the request for proposals.

Unless there is no need for negotiations with any of the offerors, negotiations will be conducted with offerors who submit proposals determined to have a reasonable chance of being selected for award, based on evaluation against the technical and price factors as specified in the RFP. Such offerors will be accorded fair and equal treatment with respect to any opportunity for negotiation and revision of proposals. The purpose of negotiations will be to seek clarification with regard to and advise offerors of the deficiencies in both the technical and price aspects of their proposals to assure full understanding of and conformance to the solicitation requirements. No offeror will be provided information about any other offeror's proposal, and no offeror will be assisted in bringing its proposal up to the level of any other proposal. Offerors will not be directed to reduce their proposed prices to a specific amount in order to be considered for award. A common deadline will be established for receipt of proposal revisions based on negotiations.

After evaluation of proposal revisions, if any, the contract will be awarded to the responsible firm whose qualifications, price and other factors considered, are the most advantageous to the County.

Professional services, including but not limited to architect, engineer and legal services in the excess of the small purchase limitation (\$25,000) may be obtained by either the competitive proposals method or qualifications-based selection procedures, unless State law mandates the specific method. Sealed bidding, however, will not be used to obtain professional services. Under qualifications-based selection procedures, competitors' qualifications are evaluated, and the most qualified competitor is selected, subject to the negotiation of fair and reasonable compensation. Price is not used as a selection factor under this method. Qualifications-based selection procedures will not be used to purchase other types of services even though architect-engineer firms are potential sources.

Describe whether the PJ will administer eligible activities directly:

Delaware County Office of Housing and Community Development will administer the HOME-ARP program directly. Subgrantees selected for development of a non-congregate shelter or affordable rental housing will be required to execute a HOME Partnership Agreement outlining the responsibilities of the County and Subgrantee for administration.

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:

The County will not provide any administrative funds to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

Table 3: Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$0.0		
Acquisition and Development of Non-Congregate Shelters	\$ 2,422,829		
Tenant Based Rental Assistance (TBRA)	\$0.0		
Development of Affordable Rental Housing	\$ 750,000		
Non-Profit Operating	\$ 0.0	0 %	5%
Non-Profit Capacity Building	\$ 0.0	0 %	5%
Administration and Planning	\$ 559,911	15 %	15%
Total HOME ARP Allocation	\$ 3,732,740		

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

Priority needs identified in the needs assessment and gap analysis are:

1. Increase the supply of affordable rental housing.
2. Provide non-congregate shelter beds/units.

Delaware County will allocate \$750,000 towards the provision of affordable rental housing and \$2,422,829 for the development of non-congregate shelter units. Efforts will be made to leverage other funds to maximize the benefit of the HOME-ARP grant. The selected projects will not violate fair housing or civil right requirements and will be available to all HOME-ARP identified qualifying populations.

Other priority needs identified will be pursued through alternate federal, state and local resources. Recognizing that housing stability is a critical indicator for health, education and employment outcomes, County Council recently convened a Working Housing Group of stakeholders, elected officials,

government agencies, nonprofit service providers, developers and interested community members to meet quarterly and develop actionable items to address homelessness/shelter resources and renter and homeowner issues for at-risk of homelessness by the end of 2023.

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:

Delaware County currently has a scattered site shelter system concentrated within two Delaware County Municipalities. The shelters use a dormitory setting except for two shelters that serve families. These dormitory-style shelters led to an increased dependency on hotel stays during the COVID-19 pandemic and shelters were required to depopulate to reduce the transmission risk. In addition, one organization that provided overnight shelter in churches to 30 individuals per night was forced to cease operations during the pandemic. The changes due to these circumstances has led to a realization that a centralized, non-congregate shelter offering wraparound McKinney-Vento eligible supportive services is a need in our community to increase the permanent housing success of those experiencing homelessness and ensure unbiased access.

HOME-ARP Production Housing Goals

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

The goal across all Qualifying Populations is to create 15 new construction affordable rental units. While the provided housing production goal calculation worksheet estimates 19 units with a set-aside of \$750,000, based on recent increased labor and material costs, the County believes that creation of 15 units is an attainable goal.

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

The production of 15 new construction units will address our identified highest priority need of new available affordable rental units for households at and below 50% MFI. The creation of these units will reduce the risk of homelessness for households burdened with unaffordable rents as well as increase the affordable housing options for the clients of the PHAs Housing Choice Voucher programs and the Emergency Housing Voucher programs.

Preferences

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

Delaware County will not establish a preference; all Qualifying Populations will be eligible for County HOME-ARP funded projects.

Any preference established in the future will be described in an amendment to this Allocation Plan and will not violate any fair housing, civil rights, or nondiscrimination requirements at the federal, state, or local level, which includes but is not limited to requirements found in 24 CFR 5.105(a).

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 preferences are identified.

Referral Methods

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:

Delaware County will use the Coordinated Entry system as an indirect referral source. Coordinated Entry will be used for intake in order to add eligible applicants to the relevant HOME-ARP project waiting list. Referrals from the project waitlist will be selected in order of which they were received. Coordinated Entry will not be used to admit applicants directly to a HOME-ARP assisted project.

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:

Coordinated Entry will not be used to admit applicants directly to a HOME-ARP-assisted project as it does not include all of the Qualifying Populations. Referrals will be accepted from other sources including emergency shelters, domestic violence support agencies/organizations, street outreach programs and service providers.

All referrals will be placed on the relevant project wait list and admitted in order of the referrals receipt.

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

Coordinated Entry will not be used to admit applicants directly to a HOME-ARP-assisted project. The CoC Coordinated Entry method of prioritization will not be utilized.

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:

Coordinated Entry will not be used to admit applicants directly to HOME-ARP assisted projects as it does not include all of the Qualifying Populations. Referrals will be accepted from other sources and include emergency shelters, domestic violence support agencies/organizations, street outreach programs and service providers. All referrals will be placed on project wait lists and admitted in order of referral receipt. Source of referral will not give one applicant preference or prioritization over another.

Limitations in a HOME-ARP rental housing or NCS project

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:

Delaware County will not establish limitations on eligibility.

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.

APPENDICES

Appendix A: HOME-ARP Survey Instrument

Appendix B: HOME-ARP Survey Responses

Appendix C: Public Notice and Public Hearing

Appendix D: Certifications



HOME-ARP Survey

To address the need for homeless assistance and supportive services, Congress appropriated American Rescue Plan (ARP) funds to be administered through the HOME Program to implement four possible **eligible activities**:

- Acquisition and development of non-congregate shelter units
- Development and support of affordable housing
- Provision of supportive services
- Tenant-based rental assistance

ARP requires the funds to primarily benefit **qualifying populations** that include individuals and/or families that, are:

- Homeless: lacks a fixed, regular, and adequate nighttime residence.
- At risk of homelessness: Annual income below 30% of area median income and does not have sufficient resources or support networks to prevent them from becoming homeless.
- Fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking or human trafficking.
- Other vulnerable populations: Annual income below 30% of area median income and experiencing severe cost burden and/or previously qualified as homeless and currently housed due to temporary/emergency assistance.

Delaware County has been allocated \$3.7 million of HOME-ARP funds. To receive funds, the County is required to prepare an allocation plan which involves engaging service providers, community-based organizations, advocates and others to identify unmet needs and gaps in housing and/or service delivery systems while identifying eligible activities currently taking place or being planned for. Input from this survey will be used to inform the County's strategy for using HOME-ARP funds.

Thank you for completing this survey. Any questions can be directed to the Delaware County Office of Housing & Community Development at OHCD@co.delaware.pa.us or (610) 891-5425.

SURVEY

1. Are you a resident of Delaware County? ☐ YES ☐ NO
2. Do you work or provide services in Delaware County? ☐ YES ☐ NO

If YES, what type of organization best describes the group with which you are affiliated:
(Select as many choices as needed).

- | | |
|---|--|
| <input type="checkbox"/> Homeless service provider | <input type="checkbox"/> Organization serving people with disabilities |
| <input type="checkbox"/> Domestic violence service provider | <input type="checkbox"/> Other organization serving people with high risk of housing instability |
| <input type="checkbox"/> Other service provider | <input type="checkbox"/> Government agency |
| <input type="checkbox"/> Veterans' group | <input type="checkbox"/> Other _____ |
| <input type="checkbox"/> Civil rights/Fair housing organization | |

Name of Employer or Service Organization: _____

3. In your opinion, how difficult is it to get into a shelter?

- | | |
|---|---|
| <input type="checkbox"/> Easy | <input type="checkbox"/> Difficult |
| <input type="checkbox"/> Somewhat Easy | <input type="checkbox"/> Very difficult |
| <input type="checkbox"/> Somewhat difficult | <input type="checkbox"/> I don't know |

4. Please rank from 1 to 4 the following activities in order of **need**:
(1 is highest priority, 4 is lowest.)

- _____ Development of non-congregate shelter units
- _____ Development of affordable housing
- _____ Provision of supportive services
- _____ Tenant-based rental assistance (TBRA)

5. Please rank from 1 to 5 your priority for **qualifying populations**:
(1 is highest priority, 5 is lowest.)

- _____ Homeless
- _____ At risk of homelessness
- _____ Fleeing, or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking
- _____ Other vulnerable populations requiring services or housing assistance to prevent homelessness

6. What needs or gaps do you see in Delaware County's Continuum of Care system for individuals and/or families that are homeless, at risk of homelessness, fleeing, or attempting to flee domestic violence, sexual assault, stalking, or human trafficking, or other vulnerable populations requiring services or housing assistance to prevent homelessness?

7. What needs or gaps do you see in Delaware County's service delivery system for individuals and/or families that are homeless, at risk of homelessness, fleeing, or attempting to flee domestic violence, sexual assault, stalking, or human trafficking, or other vulnerable populations requiring services or housing assistance to prevent homelessness?

8. What are the current gaps within Delaware County's shelter system for individuals and/or families that are homeless, at risk of homelessness, fleeing, or attempting to flee domestic violence, sexual assault, stalking, or human trafficking, or other vulnerable populations requiring services or housing assistance to prevent homelessness?

9. What are the current gaps within Delaware County’s housing inventory?

10. Please provide any additional feedback:

OPTIONAL

Do you have lived experience of homelessness?

☐ YES

☐ NO

Which of the following best describes you:

☐ White

☐ Black/African American

☐ American Indian/Native Alaskan

☐ Asian

☐ Native Hawaiian/Other Pacific Islanders

☐ American Indian/Native Alaskan & White

☐ Asian & White

☐ Black/African American & White

☐ American Indian/Native Alaskan & Black/African American

☐ Other _____

☐Hispanic

☐ Non-Hispanic

If you would like to share your contact information, please add below:

Name: _____

Phone: _____

Address: _____

Email: _____

City: _____

Zip: _____

Thank you for completing Delaware County’s HOME-ARP Survey!

Appendix B: HOME-ARP Survey Responses

OHCD distributed a HOME-ARP Survey on April 7, 2022 to Delaware County service organizations and agencies that work with the HOME-ARP eligible populations. The survey was available online as a Microsoft Form. A copy of the survey is included below. Responses were received from 61 individuals at 25 service provider organizations, 6 government agencies, 2 public housing authorities, and 2 school districts.

Open ended responses are summarized below with some included as full responses. Additional analysis of survey responses is provided in the Allocation Plan.

Continuum of Care

What needs or gaps do you see in Delaware County's **Continuum of Care** system for individuals and/or families that are homeless, at risk of homelessness, fleeing, or attempting to flee domestic violence, sexual assault, stalking, or human trafficking, or other vulnerable populations requiring services of housing assistance to prevent homelessness?

Shelter Availability and Access

- More shelters are needed
- Make sure current shelters are in decent shape.
- Shelters that can accommodate families.
- More shelter space for victims of domestic violence, sexual assault, stalking or human trafficking.
- We need more shelters to place families and individuals or fleeing from domestic violence, sexual assault, stalking or human trafficking. More funding to help with assisting individuals to prevent evictions and or down payment to move into housing. We need the poverty scale to be raise so that more people can access these services because I feel as though the standard to receive services is not fair for the working-class families.
- I think we need to modernize and diversify the access points in our systems. I don't believe that we should be shuffling individuals into certain locations in order to have them access certain services. An online intake and/or the ability for all organizations to conduct assessments and referrals should be enacted.
- I see a need for safe shelter for the LGBTQ and other populations that do not easily fall into "traditional" housing/shelter groups, drug addicts who will not admit to their addiction (and possibly have children), persons in the US illegally (whether or not by their own choice), the elderly.
- Many of our [DAP] clients are unable to get into a shelter due to how full they are on a regular basis (including ours). Therefore, people tend to risk temporary housing with acquaintances, estranged family, strangers, and in the worst cases-- end up returning to their abuser until an opening at a safe house or shelter arises.

Affordable Housing

- [For] people in safe houses or shelters, the process of finding affordable housing, rental assistance, or supportive moving funds is incredibly limited.
- More affordable housing is needed.
- Rents are high and landlords are not taking care of their units.
- Affordable housing that accepts Housing Choice Vouchers.
- Affordable housing that leads to homeownership.

- Affordable housing in desirable neighborhoods.
- Eviction prevention funding and services
- The gap I see is thinking homelessness can be eradicated. It can't. You cannot prevent natural disasters from happening, you cannot prevent mental illness, you cannot control the actions of others, you can only control how you respond. It would be great if the system were proactive rather than reactive; find unused land, create a small homes community, provide classes to the occupants of the small homes community on budgeting and basic thriving skills...
- Very aged, substandard housing stock in the more "affordable" areas of Delaware County. Not enough apartment units in multi-family housing complexes. Too many lower income households struggle with utility and general maintenance costs for keeping up yards, basements, attics, etc.

Continuum of Care System

- Address inefficiencies in the Continuum of Care system.
- Add online system to access Coordinated Entry that can be used by multiple organizations.
- Paperwork is redundant.
- Improve communication between service provider and client.
- Modernize the system and use innovative thinking to develop appropriate referral, shelter, and housing.
- Be consistent with unified messaging.

Case Management and Supportive Services

- Some clients who have been deemed "higher risk" receive services faster while they may be told to wait months even years for help even though they too are fleeing DV and are at risk of serious harm. Triaging trauma and threat levels in a DV shelter is really upsetting and triggering for clients.
- Continued connectivity with Drug and Alcohol and Mental Health services.
- Youth services are needed.
- Increase staff to assist with navigating the system.
- [There is] no support for young people who hardly get support and usually end up in jail or victims of violence. They can't get public assistance or housing assistance and we wonder why there's so much growing violence. We really need to address this now not later! 13-35 years old.
- Effective case management that helps individuals access homeless prevention services, foreclosure pre-counseling; mental health court to prevent eviction. Enough funding to prevent eviction.
- People to help them navigate the system, be available to answer their questions, give them information and walk them through what their options are when it comes to housing, finding housing, maintaining housing.
- I think more support services are needed for the population that we put in RRH, TBRA, etc. Many people fail out because they do not have the skills to maintain housing on their own. However, if they had someone able to teach them budgeting, cleaning, budgeting, and provide hands-on assistance they may be more successful.

- I think that the system is drastically understaffed and there needs to be an increase in capacity. Rather than our current model of triage and shuffle to the appropriate services, we could do a more holistic person-focused assessment of individuals who interact with the system if there was an increase in capacity.
- Lack of police presence that are sensitive to the needs of its community without bias of race.
- Need for police to notify service agencies prior to evictions.
- Often getting services takes too long. Especially for those fleeing domestic violence there tends to be a lack of resources to get them into a shelter, a hotel room, help them plan a safe place to go in the immediate. Homelessness is often more complicated by more than one factor (physical needs, mental health/physical health needs, etc.) as such connecting the homeless with other services is important and often happens slowly if at all. There is a strong lacking in trauma-informed practices to help reconnect the homeless to their community.
- Needs more literature about County resources.

Service Delivery

What needs or gaps do you see in Delaware County's **service delivery** system for individuals and/or families that are homeless, at risk of homelessness, fleeing, or attempting to flee domestic violence, sexual assault, stalking, or human trafficking, or other vulnerable populations requiring services of housing assistance to prevent homelessness?

Access to Resources and Programs

- The programs offered aren't easy to find. When I was in a shelter, my case managers didn't always let me know of any resources. People are getting paid to help but the help is lacking.
- Lack of consistent information, hard to find the information.
- The process, from our clients' perspective, is demeaning, mean-spirited, complicated and inefficient.
- I don't know that there is a county wide knowledge of services that are available. Many, many years ago, I could have greatly benefited from services that were in existence that I did not find out about until many years later.
- Often, individuals do not have access to the internet to explore/find/utilize resources, such as a laptop. Once those individuals are identified, they should be provided with tools such as access to a laptop/computer and a DHS worker, who can help assist them in this process.
- Often the person needs to go to an agency in person to fill out forms, I get that, but many have no car/transport money. Could there be a voucher system for transportation?

Staff Development and Training

- The salary needs to be competitive enough to keep the staff who are knowledgeable. Staff need to be skilled at teaching clients who may have never held down gainful employment or do not believe they are capable of doing so.
- Continued training for staff and police who interact with this population.
- Those of us not doing housing directly... require referral and service delivery training.
- There are fewer options available due to severe staffing shortages.
- Not enough caseworkers willing to help people look for housing or transition to new housing.
- No service available to help find shelter for the evicted.
- More staff are needed to help organizations to provide more patience to consumers because with the amount of clientele that are in need of these assistance has been overwhelming due to shortage of staff.

- Need for wraparound case management in the system to help people in search of employment. I think there is some of these services, but we need to increase capacity to make it more robust.
- A major gap is TRAINING. Staff at DV and homeless shelters should receive ongoing training around vicarious trauma, crisis response, and updates on available county resources. Online JARS is a great intro course to prep any new staff, but is not sufficient for preparing for real crises, interpersonal struggles, parenting concerns, safety breaches, and trauma responses as they occur in real-life. Additionally, the JARS training on cultural humility and inclusion is incredibly lacking. Staff should be constantly engaging in self-reflection on internalized biases, updating language/terms to be more inclusive, and responding positively to community feedback when needs are expressed in regards to inclusivity.

Additional Services Needed

- There are frustrating accounts by some that have expressed a lack of satisfaction. Often, some have felt disengaged from the provider on the phone. There is little referrals made when a person does not fit a program or is turned away, so they often feel abandoned or that nothing can be done to help them. Many seem to be missing the connection needed to help problem solve and create a plan for a program or to try elsewhere. Many have grown frustrated with the shuffle between programs to still get no help at the end of it.
- Clients who need help may have intellectual disabilities and not be able to advocate for themselves.
- I see that there are not enough programs that give people the tools they need to become self-sufficient and be able to secure housing permanently...If we aren't equipping the people with job security, income that meets the cost of living, affordable childcare so that families can work and still survive... then we really are just continuing the cycle of housing instability.
- Many individuals who are at risk, struggle to maintain employment, preventing any source of income, ultimately leading to difficulties like gaining information regarding these circumstances. Oftentimes, people cannot afford a phone/nor do they have access to one, which can severely hinder the ability to use the internet in order to discover assistance.
- Transportation, affordable housing, medical and mental health services, case management in the community

Availability of Shelter and Housing

- When individuals are in the shelter system, it takes a long time for them to obtain low-income housing or other housing to meet their needs - either section 8 or other benefits
- Need for more affordable housing.
- Access to emergency housing. Can take some time before a person is willing to accept shelter. Once they are ready, there has not been a place for them to go.
- Not enough beds to accommodate increased population. Difficult for persons to obtain low-income housing without income or waiting on SSA benefit determination.
- The need for more homeless shelter providers in Delaware County for families, single adults, women and men and elderly.
- Our shelter system is small and unfortunately inadequate to serve the need. I also know that the sites are concentrated in just a few communities, many of which are located in our county's disadvantaged communities. This hyper-localization of need means that there is now an inherent barrier to those individuals accessing the resources that would allow for them to change the circumstances they face. Work is encouraged for all shelter participants but no shelter is located in the business centers of Haverford, Media, or Springfield where there are countless businesses hiring.

- There are many different numbers for individuals to call but no way of knowing how available a resource is, so clients are left calling 5-15 numbers trying to find housing or other resources which has to be exhausting.
- Relationships with willing private apartment complexes to take on emergency housing needs.

Shelter System

What needs or gaps do you see in Delaware County's **shelter system** for individuals and/or families that are homeless, at risk of homelessness, fleeing, or attempting to flee domestic violence, sexual assault, stalking, or human trafficking, or other vulnerable populations requiring services of housing assistance to prevent homelessness?

Shelter Provision

- The availability of non-congregate housing units.
- There needs to be more diversity/creativity in housing options and partnership within communities to think outside the box where emergency shelter for families is concerned. Many times, my homeless families consist of 3 or more children and a single parent. I have families in shelter programs right now and all of their children are not with them because the shelter cannot accommodate them... but there needs to be a way to keep these families together for the social and emotional health of the entire family.
- Need for more shelter space, particularly for families, persons with mental/behavioral health issues, persons with chemical/substance abuse issues, domestic violence and LGBTQ+ persons, and the elderly.
- Couples cannot be together. People with immune illnesses cannot be exposed to others in shelters.
- There aren't enough shelters and the shelters that are available often can't accommodate the family as a whole; for an example, an all-women's shelter would cause a single mother with boys to have to choose whether to separate from her children or be homeless.
- Would be beneficial to have more emergency housing for families and reduced time that families, for the sake of the children, should have to remain in the shelters. Most housing available is for individuals with disabilities and are chronic.
- There are not enough beds in general but in addition there is only one shelter that will accept pets. Many who are homeless with pets will not use a shelter that forces them to abandon their pet.
- Lack of LGBTQ+ safe shelters or shelters that are inclusive for all domestic violence survivors including men and LGBTQ survivors.
- Provisions around gender specific shelters need to be examined, especially for the DV community. The LGBTQ+ community is massively underserved due to the gendered restrictions, binary language, and heteronormative messaging amongst DV service organizations and shelters in our county. We know based on numerous studies that this population already underreports DV and is discouraged from accessing homeless services historically.

Length of Stay

- I think getting people out in a safe and timely manner is lacking. I was in a shelter for nearly a year. I was pregnant for all of it. Instead of moving with a preemie newborn, housing should have been figured out before. Families, and expecting mothers, should be prioritized. But singles shouldn't get completely ignored.
- Time restrictions on how long they can remain in the shelter.

- Once accepted into a shelter, individuals should be made aware of housing assistance, regardless if they qualify or not. If these individuals do qualify, assistance should be provided to help them apply.

Related Issues

- Culture shift reflected in language used across organizations, ongoing inclusivity trainings for all staff, updating policies and procedures to provide considerate options to protect and care for LGBTQ+ individuals in our shelters/safe houses, outreach into the LGBTQ+ community, and acknowledgement/accountability for the past mistakes all of our organizations have made in heteronormative, exclusionary messaging and service provision.
- More funding needs to be given to community agencies to assist individual and families with security and first month deposits.
- Recidivism.
- Accessibility to the programs/ remove the stigma by prioritizing funding and training for staff.
- Limited times/place homeless person can access coordinate entry.
- There is without a doubt a shortage of affordable housing inventory in Delaware County. The rent burdens are also deeply inequitable. Renters of color are more likely to face unaffordable rents with more than half of black renters paying more than 30 percent of their income on rent. In Delco, a worker needs to make \$24.23 an hour in order to afford a modest 2-bedroom home. Therefore, more affordable rents and housing for purchase COUNTY WIDE would be a much-needed boon to families in need. This housing must be located all over the county not just in those places typically reserved for individuals with low income.

Housing Inventory

What are the current gaps within Delaware County's **housing inventory**?

Price / Rent

- Very high rents, low vacancy rate
- Difficulty finding housing that accepts vouchers.
- The lack of area rent control laws.
- FMR [Fair Market Rent] is not matching the reality of the cost of rents in Delaware County.
- The prices for apartments and housing is astronomically so high that families are unable to afford today's housing. More funding needs to be put in the budget for Section 8, public or any type of affordable housing.
- There is a gap in finding affordable housing for those in need. The cost of living has increased but the wages have not. Vulnerable populations are at risk of becoming homeless because they can't afford to pay current rent, or they are in situations they need to get out of but there isn't anywhere for them to go. Vulnerable populations often also cannot meet the requirements to get housed, such as passing a background check or having enough of a credit score to qualify. They may be employed but their income is not even to qualify to rent in Delaware County because of the income requirements.
- So many barriers and stipulations. People are suffering all over due to unfair renting practices and requirements. Huge down payment fees or pre-screening requirements like credit. Many people are homeless because they don't have good credit history... If everyone could afford to have great credit, they would probably own more so than rent.

Availability and Location

- Not enough affordable housing in safe neighborhoods, landlords unwilling to participate in housing programs, increased rent.
- Housing inventory is extremely limited and the housing that is available is extremely expensive.
- Fewer landlords are accepting HUD vouchers or rental supplements and FMV has not kept pace with increasing rental and housing costs.
- Need more housing navigators equipped with the tools needed to assistance our population.
- Rents not affordable for minimum wage workers.
- Many don't take pets.
- LGBTQ-safe housing

Ownership and Condition

- Mostly corporate landlords, need to encourage small landlords. Property management will not house subsidies due to one or two negative occurrences. Due to the amount of properties in Delaware County, in conjunction with the FMR [Fair Market Rent], finding housing has been extremely difficult.
- Landlords due not keep up with building maintenance.

The Philadelphia Inquirer

100 S. INDEPENDENCE MALL W, STE 600, PHILADELPHIA, PA 19106

Affidavit of Publication

On Behalf of:

DELAWARE CO OFFICE OF HOUSING and COMMUNITY DEVELOPMENT
ATTN: MAUREEN DELONG
2 W BALTIMORE AVE, STE 202
MEDIA, PA 19063

STATE OF PENNSYLVANIA COUNTY OF PHILADELPHIA:

Before the undersigned authority personally appeared the undersigned who, on oath represented a and say: that I am an employee of The Philadelphia Inquirer, LLC, and am authorized to make this affidavit of publication, and being duly sworn, I depose and say:

1. The Philadelphia Inquirer, LLC is the publisher of the Philadelphia Inquirer, with its headquarters at 100 S. Independence Mall West, Suite 600, Philadelphia, PA 19106.
2. The Philadelphia Inquirer is a newspaper that which was established in in the year 1829, since which date said daily newspaper has been continuously published and distributed daily in the City of Philadelphia, count and state aforesaid.
3. The printed notice or publication attached hereto set forth on attached hereto was published in all regular print editions of The Philadelphia Inquirer on

Legal Notices

as published in Inquirer Legals in the issue(s) of:

3/8/2023

4. Under oath, I state that the following is true and correct, and that neither I nor The Philadelphia Inquirer, LLC have any interest in the subject matter of the aforesaid notice or advertisement.

Helene Sweeney

Katherine V. Harley
Notary Public

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KATHERINE V. HARLEY, Notary Public
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Ad No: 130392

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COPY OF ADVERTISEMENT

COMBINED NOTICE COUNTY OF DELAWARE HOME ARP ACTION PLAN

PUBLIC COMMENT PERIOD and HEARING

As a Participating Jurisdiction (PJ), the County of Delaware (County) was allocated \$3,732,740.00 in HOME-ARP funding through the American Rescue Plan Act of 2021 for the HOME Investment Partnerships Program to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability. PJs must submit a HOME-ARP Allocation Plan to identify unmet needs of the qualifying populations and gaps in housing, shelter and services, and describe how the funding will be used to address gaps through eligible activities. As part of the citizen participation process, the County will hold a public hearing to obtain the views of citizens, public agencies and other interested parties on the draft ARP Allocation Plan of priority needs to be addressed and types of activities to be undertaken with the HOME-ARP funding. The public hearing will be held Monday March 20, 2023 at 2:00 pm. Citizens and interested agencies are encouraged to participate in the meeting and may attend either in person at 2 W. Baltimore Avenue, Room 202, Media, PA 19063 or may request a Microsoft TEAMS invite to join electronically. Please contact Phil Welsh at welshp@co.delaware.pa.us for an invite. The County will also accept public comments at the Tuesday, March 14, 2023 County Council agenda meeting at The County Council Room, 201 W. Front Street, Media, PA 19063 The Draft plan is available for review at <https://delcopa.gov/hcd/Index.html> or by visiting the Office of Housing and Community Development (OHCD) at 2 W. Baltimore Avenue, Media, PA 19063. Comments will be accepted at both meetings identified above or via email until March 23, 2023. Comments should be emailed to welshp@co.delaware.pa.us Persons with Limited English Proficiency, a disability, or that require other accommodations to participate are asked to contact the OHCD (610-891-5425) at least 48 hours prior to the meeting to discuss those needs.

Philip Welsh, Director
Office of Housing and Community Development

Housing & Community Development

Home / Departments / Housing & Community Development

ALERT - EFFECTIVE 12/22/22

THE OFFICE OF HOUSING AND COMMUNITY DEVELOPMENT MOVED TO:

2 W. BALTIMORE AVENUE
SUITE 202
MEDIA, PA 19063

Due to the evolving Novel Coronavirus (COVID-19) pandemic in our region, Delaware County is taking measures to keep the public and county employees safe by minimizing social contact.

During this time, we are using email as the primary method of communication. Please refer to our staff directory link [here](#) or leave a message at 610-891-5425. If you are not able to conduct business online, staff is available by appointment.

The mission of the Office of Housing and Community Development (OHCD) is to promote sound housing and community development in Delaware County with the use of federal, state and local resources. OHCD is responsible for the planning, administration, and oversight of three federal programs: the Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME) and Emergency Solutions Grants (ESG) Programs. The office is also charged with oversight of state initiatives funded through the Pennsylvania Department of Community and Economic Development and County initiatives, as funds become available.

RECENT UPDATES AND ANNOUNCEMENTS



The County of Delaware (County) was allocated \$3,732,740.00 in HOME-ARP funding through the American Rescue Plan Act of 2021 for the HOME Investment Partnerships Program to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability. The County prepared a draft HOME-ARP Allocation Plan to identify unmet needs of the qualifying populations and gaps in housing, shelter and services, and address how the funding will be used. A public hearing will be held Monday March 20, at 2:00 pm to obtain the views of citizens, public agencies and other interested parties on the draft plan. Citizens and interested agencies are encouraged to participate in the meeting and may attend either in person at 2 W. Baltimore Avenue, Suite 202, Media, PA 19063 or request a Microsoft TEAMS invite to join electronically. The Draft plan is available for review [here](#) or by visiting the Office of Housing and Community Development (OHCD) at 2 W. Baltimore Avenue, Suite 202, Media, PA 19063. Comments will be accepted at the meeting or via email until March 23, 2023. Comments and TEAMS requests should be emailed to welshp@co.delaware.pa.us.

The Delaware County Lead Hazard Reduction Program (LHRP)

Did you know that qualified homeowners, landlords, and renters can improve the safety of their properties and homes by testing for and remediating lead paint? Learn more about this grant program [here](#).

HOUSING & COMMUNITY DEVELOPMENT NAVIGATION

- > [Contact Us](#)
- > [Housing and Community Development](#)
- > [Consolidated Planning](#)
- > [CDBG Program](#)
- > [HOME Program](#)
- > [ESG Homeless Assistance](#)
- > [Housing Initiatives](#)
- > [LHRP Lead Program](#)
- > [Blighted Property Demolition Fund](#)
- > [Fair Housing](#)
- > [Additional Resources](#)
- > [UCC Board of Appeals](#)
- > [Career Opportunities](#)

Philip Welsh, Director
Housing & Community Development

2 W. Baltimore Avenue
Suite 202
Media, PA 19063
Phone: 610-891-5425
Fax: 610-566-0532
Email: OHCD@co.delaware.pa.us



OHCD provides services without regard to race, color, religion, sex, handicap, familial status, age, or national origin.

[illegible]

DELAWARE COUNTY HOME-ARP PUBLIC HEARING



Welcome

The County of Delaware (County) was allocated \$3,732,740.00 in HOME-ARP funding through the American Rescue Plan Act of 2021 for the HOME Investment Partnerships Program to assist individuals or households who are homeless, at risk of homelessness, and other vulnerable populations, by providing housing, rental assistance, supportive services, and non-congregate shelter, to reduce homelessness and increase housing stability. The County has prepared a HOME-ARP Allocation Plan to identify unmet needs of the qualifying populations and gaps in housing, shelter and services, and describe how the funding will be used to address gaps through eligible activities. This hearing provides citizens, public agencies and other interested parties to comment on the draft ARP Allocation Plan of priority needs to be addressed and types of activities to be undertaken with the HOME-ARP funding.

Objective

ARP requires that funds be used to primarily benefit individuals and families in the following specified “qualifying populations.” Any individual or family who meets the criteria for these populations is eligible to receive assistance or services funded through HOME-ARP without meeting additional criteria (e.g., additional income criteria). All income calculations to meet income criteria of a qualifying population or required for income determinations in HOMEARP eligible activities must use the annual income definition in 24 CFR 5.609 in accordance with the requirements of 24 CFR 92.203(a)(1)

Homeless

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence
- (2) An individual or family who will imminently lose their primary nighttime residence
- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition

At-Risk of Homeless

- (1) Has an annual income below 30 percent of median family income for the area
- (2) Does not have sufficient resources or support networks; family, friends, faithbased or other social networks, immediately available to prevent them from moving to an emergency shelter or another place
- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition

At-Risk of Homeless

(3) Meets one of the following conditions:

- (A) Has moved because of economic reasons two or more times during 60 days prior to the application for homelessness prevention assistance;
- (B) Is living in the home of another because of economic hardship;
- (C) Has written notice that their 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 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 unit in which there reside more than 1.5 people per room,
- (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);
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness

Fleeing Domestic Violence

Any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking. Includes cases where an individual or family reasonably believes that there is a threat of imminent harm from further violence due to 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 or remain within the unit.

In the case of sexual assault, this also includes cases where an individual reasonably believes there is a threat of imminent harm from further violence if the individual remains within the unit that the individual is currently occupying, or the sexual assault occurred on the premises during the 90-day period preceding the date of the request for transfer.

Other Populations

(1) Other Families Requiring Services or Housing Assistance to Prevent Homelessness is defined as households (i.e., individuals and families) who have previously been qualified as “homeless” as defined in 24 CFR 91.5, are currently housed due to temporary or emergency assistance, including financial assistance, services, temporary rental assistance or some type of other assistance to allow the household to be housed, and who need additional housing assistance or supportive services to avoid a return to homelessness.

Other Populations

(2) At Greatest Risk of Housing Instability is defined as household who meets either:

(i) has annual income that is less than or equal to 30% of the area median income and is experiencing severe cost burden

(ii) has annual income that is less than or equal to 50% of the area median income AND meets one of the previous conditions of the “At risk of homelessness” definition

Eligible Activities

- (1) Tennant Based Rental Assistance
- (2) Development and Support of Affordable Housing
- (3) Provision of Supportive Services
- (4) Acquisition and development of non-congregate shelter

Consultation

OHCD conducted a robust consultation process to inform the development of the HOME-ARP Allocation Plan. For this effort, OHCD solicited input and recommendations from county agencies, stakeholders and organizations that serve and represent the Qualifying Populations, including those with lived experience. The consultation process included participation from 14 government agencies and 25 organizations.

Consultation

The HOME-ARP Survey was completed by 61 individuals at 22 service provider organizations, six (6) county agencies, one (1) public housing authority, and two (2) school districts.

The majority of respondent's report that individuals have difficulty accessing emergency shelter. More than half (53%) state it is very difficult or difficult to get into a shelter and 25% state it is somewhat difficult while only 8% state it is easy or somewhat easy. Sixteen percent (16%) of respondents do not know how difficult it is to enter shelter services.

Survey respondents also ranked the priority of potential HOME-ARP-funded activities. The majority of respondents selected the Development of Affordable Housing (62%) as the greatest priority followed by Non-Congregate Shelter (21%), Tenant-Based Rental Assistance (11%), and the Provision of Supportive Services (5%). Refer to Graph 2: Priority Activities for complete responses.

Next Steps

Submission of HOME-ARP Plan to HUD commences HUD 60 day review.

Consult with Human Services on creation of RFP for non-congregate shelter

Issue RFP for development of affordable housing

Discussion

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:

23-6003046

5b. Federal Award Identifier:

M21-UP420209

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*** a. Legal Name:**

County of Delaware

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

23-6003046

*** c. UEI:**

HBWCWN9U72H8

d. Address:

*** Street1:**

2 W. Baltimore Avenue

Street2:

Suite 202

*** City:**

Media

County/Parish:

*** State:**

PA: Pennsylvania

Province:

*** Country:**

USA: UNITED STATES

*** Zip / Postal Code:**

19063-3740

e. Organizational Unit:

Department Name:

OHCD

Division Name:

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

Prefix:

Mr.

*** First Name:**

Philip

Middle Name:

S.

*** Last Name:**

Welsh

Suffix:

Title:

Director

Organizational Affiliation:

*** Telephone Number:**

610-891-4014

Fax Number:

610-566-0532

*** Email:**

welshp@co.delaware.pa.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:

Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

* 12. Funding Opportunity Number:

N/A

* Title:

2021 HOME Investments Partnership Program - American Rescue Plan

13. Competition Identification Number:

Title:

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

Add Attachment

Delete Attachment

View Attachment

* 15. Descriptive Title of Applicant's Project:

HOME-ARP funds will to provide housing and emergency non-congregate shelter for identified qualifying populations and OHCD program administration.

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.

Add Attachment

Delete Attachment

View Attachment

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

* a. Federal	<input type="text" value="3,732,740.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="3,732,740.00"/>

*** 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

Add Attachment

Delete Attachment

View Attachment

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:

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.

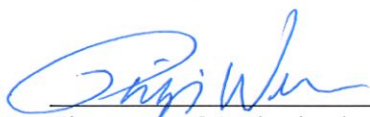
Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

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

03/24/2023

Date

Director

Title

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 Director
APPLICANT ORGANIZATION County of Delaware	DATE SUBMITTED 03/24/2023

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
Expiration Date: 02/28/2025

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.


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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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SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	<input data-bbox="876 1333 1469 1365" type="text" value="Director"/>
APPLICANT ORGANIZATION	DATE SUBMITTED
<input data-bbox="113 1470 844 1501" type="text" value="County of Delaware"/>	<input data-bbox="876 1470 1469 1501" type="text" value="03/24/2023"/>