

## HOME-ARP Allocation Plan

### Guidance

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

**Participating Jurisdiction:** City of East Orange

**Date:** January 9, 2023

### Consultation

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

#### *Summarize the consultation process:*

The City of East Orange (The City) recognizes that consultation is important to support evidence-based solutions and intentional planning. The City made this a top priority to comply with all regulatory guidelines governing HOME-ARP funds, including Notice CPD-21-10: Requirements of the Use of Funds in the HOME-American Rescue Plan Program (the Notice).

The City consulted a multitude of stakeholders including those required under the Notice, such as:

- The CoC serving the jurisdiction's geographic area,
- Homeless service providers,
- Domestic violence service providers,
- Veterans' groups,
- The Public Housing Agency,
- Public agencies that address the needs of the qualifying populations, and
- Public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

For all processes involving the administration of funds through the U.S. Department of Housing and Urban Development (HUD), the City follows consultation and public participation criteria outlined in our approved Citizen Participation Plan (CPP). The City's CPP encourages input from the community and emphasizes involvement of low and moderate-income persons of the community, particularly those living in the targeted areas. The Plan also encourages comments and participation from all city residents, including minorities, non-English speaking persons, and individuals with disabilities. For the purposes of the HOME-ARP Allocation Plan, consultation and public participation focused on receiving input from qualifying populations, as defined above, and related service providers.

All stakeholders were provided the opportunity to complete a priority needs survey, exchange ideas related to HOME-ARP funding priorities, and ask questions about the City's HOME-ARP allocation.

Email reminders were sent to inform stakeholders about the importance of attending and engaging in allocation to underscore HOME-ARP allocation was the top priority for HOME-ARP partners. For the consultation process, The City developed a PowerPoint presentation to inform partners of all relevant details concerning the HOME-ARP grant.

Stakeholders were also consulted where discussions involved soliciting input on the housing and service needs of the qualifying populations, identifying gaps in the housing inventory and homeless services delivery system, and revealing resources available for assisting qualifying populations. Direct consultations took place during January and February of 2023.

The data received from service providers, City departments, and the public helped to inform the funding priorities identified in this plan.

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

<b>Agency/Org Consulted</b>	<b>Type of Agency/Org</b>	<b>Method of Consultation</b>	<b>Feedback</b>
East Orange Department of Health		Survey / Internal Stakeholder Meeting	The City of East Orange needs both congregate and non-congregate shelter programs for seniors, disabled adults, vets, and children and families. Funding for supportive services provided by non-profit agencies is necessary to ensure that those who are homeless or at risk of homelessness are linked to services. Addressing the NIMBY issues should be incorporated in planning.
East Orange Department of Human Services	CoC; public agency that addresses the needs of QPs 1-4	Survey / Internal Stakeholder Meeting	Funding for improving and increasing the capacity of existing shelters in the City is needed.
East Orange Department of Senior Services		Survey / Internal Stakeholder Meeting	No comments received.
East Orange Reference Department	Public agency serving the needs of QPs 1-4	Survey / Internal Stakeholder Meeting	As Head of the Reference Dept here at East Orange P.L., I can attest to the growing need of supportive services, one such as a housing counselor (social worker) to advocate on behalf of homeless individuals that rely on the library daily for shelter. Librarians provide pertinent information and direction for services to the homeless but can not advocate in their best interest for additional integral services, life altering services that they require. I strongly believe that funding for an in-house social worker would tremendously benefit the homeless population in the City of East Orange.
East Orange Economic Development Division		Survey / Internal Stakeholder Meeting	No comments received.
East Orange Mayor's Office of Employment & Training		Survey / Internal Stakeholder Meeting	No comments received.

Isaiah House	Homeless Shelter and Service Provider	Survey / External Stakeholder Meeting	Costs related to offering or increasing access to supportive services is their preference. Nonprofit operating expenses also aid our organization as it pays for needed security. There should be an agency to help families keep their homes and train people and give them some kind of skill that will allow them to be more productive in society. There should be a rent cap. The community is in need of help with housing.
Sierra House	At-Risk Youth Service Provider	Survey / External Stakeholder Meeting	No comments received.
Joi's Angels	Homeless Supportive Services & Shelter	Survey / External Stakeholder Meeting	Lack of affordable housing, waitlist for Section 8, staff capacity concerns, and increased wait times for services for larger size households.
Virtual Santiago	Nonprofit Service Provider: Bilingual Services / Domestic Violence Consulting / Life Skills	Survey / External Stakeholder Meeting	Gaps exist in the current system to service and assist the residents in need.
Mental Health Association of Essex & Morris, Inc.	Nonprofit Mental Health Service Provider	Survey / External Stakeholder Meeting	No comments received.
Zadie's of The Oranges	Childcare Facilities	Survey / External Stakeholder Meeting	No comments received.
Essex County CoC	Homeless and At-Risk of Homeless Service Provider	Survey / Meeting	Priority populations in order are persons who are homeless, persons who are at-risk of homelessness, persons who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, and other households who require services or housing assistance to prevent homelessness. Number one priority assistance was supportive services.



Urban Renewal	Homeless Service Provider	Survey	Need for non-congregate shelters Focus on quality, person centered, housing focused case management ADA accessible shelters Safe shelters for LGBTQ+ households Lack of shelters for households that aren't able to take care of themselves (have medical needs) Additional funding for non-congregate shelters Resources for those with criminal background history
Mental Health Association	Needs of People with Disabilities	Survey / Phone Call	ADA compliant units  ADA accessible shelters  Prioritize accessibility in all projects and create equitable opportunities for the disability community.
SoliderOn	Mental Health / Veterans / Homeless	Survey / Phone call	Kelly McGuinness raised the need for more affordable rental units/TBRA and additional supportive housing for elderly Veterans who do not qualify for nursing homes.
East Orange Housing	Public Housing Agency (PHA) /Fair Housing / Civil Rights / Needs of people with Disabilities	Survey / External Stakeholder Meeting	Stressed the need for education services for tenants on their rights, suggested increased TBRA for security deposits. Also the greatest need in the city is affordable permanent housing. Even with housing vouchers, there needs to be more available units in the market as rent is currently above what QPs could pay.
East Orange Community Development Corporation	At Risk of Homelessness Service Provider/Rental Assistance/Relocation Assistance/Case Management	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Access Family Services	Domestic Violence Shelter & Service Provider	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.

Family Success Center	Family Service Provide / Financial Literacy	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Purple REIGN	Domestic Violence Supportive Services	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
East Orange YMCA	Recreational Services	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Fresh Start Academy	School District	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Big Bro/Big Sis	Children & Family Support / Mentoring Services	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Disabled American Veterans	Disabled Veterans Supportive Services	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Essex County College	Public Community College Institution	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
NAACP	POC Advocacy Services	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
New Community Corporation	Affordable Housing & At Risk of Homelessness Supportive Services	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.

Urban League of Essex County	Financial Literacy Supportive Services	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Essex County RAIN Foundation	LGBT+ Emergency Shelter & Supportive Services	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Muslim Outreach for Anti-Violence	Faith Based Supportive Services Organization	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Family Connections	Mental Health / Domestic Violence Supportive Services	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Center for Family Services	Domestic Violence Supportive Housing & LGBT+ Affirming Care	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
East Orange Salvation Army	Faith Based Social Services Organization	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Real House Inc.	Addiction Treatment Services & Shelter	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Turning Point Community Services Inc.	Housing & Supportive Services	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Covenant House	Homeless Shelter & Service Provider	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.

New Hope Village 4 Veterans	Veteran Housing & Supportive Services	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.
Love Thou Neighbors Corp.	At Risk of Homelessness Supportive Services	Consultation email, survey sent, and invitation to Stakeholder meeting.	No comments received.

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

Stakeholders noted in the chart above who participated prioritized affordable rental housing development and the provision of supportive services as activities most needed to reduce homelessness and increase housing stability within the City. However, there was an additional need for TBRA, indicating the community feels there is a need for funding most eligible activities.

Some providers advocated for the sub-population they work with directly, while others advocated for sub-populations where they saw a gap in services. A common thread throughout the consultation meetings was that HOME-ARP funds provide an opportunity for additional services that will help people exit homelessness.

There was also a consensus around the need for supportive services to assist with housing navigation and educating prospective and current tenants on their legal rights, as well as housing stability case management to help people post-move-in maintain their housing. Several stakeholders stressed the need for more outreach services. Additional feedback received highlights the difficulty of housing clients with physical and mental disabilities, advocacy for additional shelter opportunities, addiction and mental health support, and the need for additional rental housing for low and very low-income housing. Consultation with these entities focused on the community's needs and how the funds can best meet those needs within the structure of eligible activities.

## Public Participation

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



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

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

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

- ***Public comment period:*** February 12, 2023 - February 28, 2023
- ***Public hearing:*** February 22, 2023

Public participation is an essential element in assessing the needs and gathering input from the residents of East Orange. The 15-day HOME-ARP Allocation Plan public comment period was from February 12th - February 28th, 2023. A public hearing was held on February 22nd at 6pm.

In addition, the notice was displayed on the City's website, Star Ledger, City's social media platforms and emailed to the City's list of stakeholders.

Due to the "moderate" community risk level and recommendations around COVID-19, the public hearing was done via Zoom instead of public gatherings and social distancing protocols on February 22nd, 2023, to review and accept public comments on the plan.

Comments could also be submitted in writing via e-mail and U.S. mail.

***Describe any efforts to broaden public participation:***

The City implemented a robust public participation process intended to solicit meaningful input to inform the use of its HOME-ARP dollars. The City makes every effort to hear from neighbors and service providers when determining funding priorities and implements a virtual approach to community participation by conducting multiple virtual engagements. To ensure the planning process was inclusive, all print materials and digital platforms used to solicit input were formatted for accessibility and City staff were available to receive and comply with any requests for accommodation.

Traditional methods of outreach often unintentionally exclude underserved populations, particularly the qualifying populations of focus under the HOME-ARP program. The City recognized this and committed to making changes to our planning process with the intention of eliminating barriers to participation. Public notices and survey materials for the public hearing were created and sent to local businesses, libraries, community agencies for distribution through their email lists, website, and the City's social media sites to encourage public participation.

The City of East Orange promoted the surveys, community and focus group meetings, 15-day comment period, and public hearings. Consultation provided multiple opportunities in various formats for stakeholders and residents to share their experiences with working and providing services to qualified populations.

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

Full survey response is attached

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

All comments were accepted

## **Needs Assessment and Gaps Analysis**

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

Homelessness is a particularly troublesome and complex issue that plagues communities across the nation. Often, persons experiencing homelessness face multiple overlapping challenges, which presents real challenges to local jurisdictions, social service providers, and Continuums of Care (CoC) working to address homelessness. The economic realities of the housing market during this time impose constant pressure on the supply of housing, particularly for those most vulnerable to homelessness and qualifying populations.

A primary approach to addressing homelessness is to take proper inventory of the scale of the issue. This is done through data analysis, outreach, and consultation with stakeholders to assess the individual needs of qualifying populations. By doing so, not only does the city have a better understanding of needs for the homeless and at-risk of homelessness, but service and housing providers will also have greater insight into the particular needs of the homeless and other qualifying populations.

In order to accurately represent the needs of East Orange's qualifying populations, The City conducted a needs assessment and gap analysis.

The analysis also revealed several gaps in the homeless delivery system that are detailed in this section but include:

- 1) Access to available, affordable units;
- 2) Access to services;
- 3) Education and awareness;
- 4) Sufficient standardized policies;
- 5) Agency coordination;

- 6) Landlord participation; and
- 7) Data accuracy

See the full needs assessment and gaps analysis detailed below

**OPTIONAL Homeless Needs Inventory and Gap Analysis Table**

Homeless													
	Current Inventory					Homeless Population				Gap Analysis			
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	12	5	17	17									
Transitional Housing	20	8	19	16									
Permanent Supportive Housing	64	35	36	36									
Other Permanent Housing						8	12	3	15				
Sheltered Homeless						48	63	5	10				
Unsheltered Homeless						3	45	2	TBD				
<b>Current Gap</b>										78	48	94	55

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

**OPTIONAL Housing Needs Inventory and Gap Analysis Table**

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	18,500		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	5,658		
Rental Units Affordable to HH at 50% AMI (Other Populations)	3,645		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		4,465	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		2,595	
<b>Current Gaps</b>			1,758

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

<b>Figure i. Number of Homeless Persons by Municipality and Percentage of County Total</b>						
<b>Municipality</b>	<b>Total Homeless Persons</b>	<b>% of Total Homeless Persons</b>	<b>Sheltered Homeless Persons</b>	<b>% of Sheltered Homeless Persons</b>	<b>Unsheltered Homeless Persons</b>	<b>% of Unsheltered Homeless Persons</b>
Bloomfield	31	1.7%	30	1.7%	1	0.7%
City of Orange	1	0.1%	0	0.0%	1	0.7%
East Orange	51	2.7%	48	2.8%	3	2.0%
Essex Fells	2	0.1%	2	0.1%	0	0.0%
Fairfield	4	0.2%	4	0.2%	0	0.0%
Irvington	43	2.3%	42	2.4%	1	0.7%
Maplewood	1	0.1%	0	0.0%	1	0.7%
Montclair	41	2.2%	34	2.0%	7	4.7%
Newark	1,695	90.6%	1,561	90.7%	134	89.9%
Nutley	1	0.1%	0	0.0%	1	0.7%
<b>Total</b>	<b>1,870*</b>		<b>1,721</b>		<b>149</b>	

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

#### **Homeless as defined in 24 CFR 91.5**

The 2022 Point In Time (PIT) Count completed by the Continuum of Care on January 25th, 2022, a total of 51 individuals experienced homelessness on this specific night.

The majority (65%) of the homeless population identifies with being male. Less than 5% identified as Hispanic/Latino in ethnicity, where 52% identified as white and 42% identified as being black in regard to race. Just over 5% identified with multiple races. Twenty-four percent of the individuals were experiencing chronic homelessness, meaning they have a disability and have been homeless for at least 12 months over the past three years.

#### Single Adults

Majority of the homeless population within East Orange are single adults without children. As of the 2022 PIT count data, there were 51 individual adults identified as homeless, 5 of them being young adults between the ages of 18-24 while the other 46 were over 24 years of age. The gender makeup included 21% female, 89% male.

#### **Risk of Homelessness as defined in 24 CFR 91.5**

As of the 2022 Emergency Rental Assistance Program Treasury Demographic Report, a total of 98 households were assisted in East Orange. All of these households were and may continue to be at risk of homelessness due to inadequate income and the cost of housing. With an increase in individuals reporting their first episode of homelessness in 2021, (HUD CoC System Performance Measures), it is presumed their first experience with homelessness could have been avoided through expanded resources for homelessness prevention.



***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***

Through consultations with senior service providers and disability service organizations, it was revealed that those with disabilities or needing to age in place with limited financial and social resources, living independently is not a realistic or sustainable option. There are not many units that are ADA compliant and affordable for someone on a fixed income reliant on SSI or SSDI alone.

At times, people needing in-home healthcare either fall into homelessness, end up with family or friends, or are advanced to an even higher level of care, like an assisted living or nursing home facility due to the lack of independent, affordable and accessible housing and lack of supports to keep people in their homes, aging in place.

According to the New Jersey State Police Uniform Crime Reporting Unit, in 2020, there were 34 reported incidents of domestic violence in East Orange, which is a decrease from the previous year's 52 reported incidents.

As for reported sexual assault cases, in 2020, there were 13 incidents reported in East Orange, which is an increase from the previous year's 8 reported incidents. It is important to note that these statistics only represent reported incidents, and many cases of domestic violence and sexual assault go unreported.

Additionally, the statistics do not differentiate between dating violence and domestic violence, as New Jersey law considers dating violence to be a form of domestic violence.

According to the National Crime Victimization Survey, individuals with disabilities experience violent victimization at rates that are twice as high as individuals without disabilities. Additionally, a report by the Department of Veterans Affairs found that veterans with disabilities are at a higher risk of experiencing violence than veterans without disabilities. The City is committed to continuing partnerships with agencies and nonprofits to develop safe pathways for services and resources.

EAST ORANGE VIOLENT CRIMES

POPULATION: 68,903

	MURDER	RAPE	ROBBERY	ASSAULT
Report Total	UNREPORTED	UNREPORTED	UNREPORTED	UNREPORTED
Rate per 1,000	UNREPORTED	UNREPORTED	UNREPORTED	UNREPORTED

via Neighborhood Scout

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

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

*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:*

### **Supportive Services**

Throughout consultations with local organizations serving those nearing or experiencing homelessness, victim service providers, and PHAs, there was a general consensus that supportive services for housing location and case management to sustain housing are not provided to the fullest extent needed. Specifically mentioned among a few providers were supportive services, care navigation and intensive case management services for permanent supportive housing programs.

Many providers shared that there needs to be more resources dedicated to supportive services for serving all of the qualified populations. Another challenge mentioned multiple times was the difficulty in locating and identifying affordable housing suitable for the qualifying populations.

This creates additional barriers due to conditions imposed on the rental market directly related to the pandemic and little to no resources to fund supportive service helping the qualifying population with navigation.

### **Outreach and Engagement**

Home-ARP funds can be used to support outreach and engagement efforts to connect people experiencing homelessness with services and resources. This may include street outreach programs, mobile medical clinics, and other initiatives that provide basic needs, such as food and hygiene items, to people living on the streets.

### **Tenant-Based Rental Assistance**

Renters are struggling to find affordable rental units and cost-burdened renters are one unexpected expense away from homelessness. Existing rental assistance programs, such as the ERAP, Section 8 Housing Choice Voucher Program, public housing, and programs available to

homeless persons through the CoC and its partners, are overextended with either long or closed waiting lists.

There are elderly low-income renter households that are cost-burdened and low-income renter households with a disabled member have a housing problem and require housing assistance. The market characteristics for TBRA described above also substantiate the need for this type of program.

### **Permanent Supportive Housing (PSH)**

As indicated in the Housing Needs Inventory and Gap Analysis Table above, there are already limited units available for 30% or below AMI-earning households. These PSH slots are competing for these same, limited units. Expanding the number of affordable units for those earning 30% AMI and below would improve efficiency among the existing PSH programs, allowing participants to find appropriate permanent rental housing more quickly and providing options suiting an array of needs associated with ADA compliance.

Based upon feedback from homeless/at-risk of homelessness community-based organizations, homeless populations experiencing homelessness need the following:

- Development of permanent, affordable housing
- Continued access to emergency shelter and transitional housing at existing facilities
- Continued access to supportive services in the form of
  - o Case management
  - o Legal services
  - o Mental health services and counseling
  - o Health services
  - o Housing stability case management
  - o Financial literacy training
  - o Job training

### ***Identify priority needs for qualifying populations:***

Based on information from the feedback received by consultations and a review of the needs assessment and gaps analysis, including data from the 2022/2023 PIT count and other available data sources, the greatest priority should be given to the production of affordable rental housing, including permanent supportive housing, and provision of supportive services, as well as TBRA.

Additionally, in no particular order, the following are priority supportive services needs for all QPs:

- Housing navigation services;
- Outreach services;
- Case management services;
- Education services;
- Housing search and counseling assistance;

- Legal services;
- Mental health services;
- Landlord-tenant liaison services;
- Services for special populations, including trauma-informed services;

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

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

1. Non-congregate shelter – of which there are limited beds in the PJ localities - is an essential option for the increasing population of persons experiencing unsheltered homelessness who frequently are resistant to entering congregate shelters due to perceived lack of safety, severe mental illness, etc. Moreover, non-congregate shelters may address the ongoing need to ensure safe emergency housing options for persons who are transgender, persons experiencing severe mental illness, and to reduce the spread of COVID-19 and other communicable diseases. Research has found clients in the non-congregate motels and hotels had greater sense of stability, increased feelings of privacy and belonging, and reduction of interpersonal conflict in a safe location that could be accessed 24/7. These benefits resulting from more private settings led to a reduction in premature program exits and returns to homelessness, increased engagement with program services, and better outcomes for the clients. Since the unsheltered population typically has greater housing and health needs compared to the sheltered homeless population, non-congregate shelter is the priority need for this population.
2. There is a substantial gap in eviction prevention resources for at-risk of homeless households. The data (both quantitative and anecdotal) also shows a supportive services program gap in terms of serving persons experiencing severe mental illness. Mental illness is the most prevalent disabling condition amongst those experiencing homelessness per local CoC data, and stakeholders have reported an increase in the severity of mental health needs among clients served. This increase has created a significant gap in services needed with local capacity as well as the inability of the homeless service providers to provide necessary case management to clients on site with severe mental illness.
3. Finally, some stakeholders supported the need for a community wide landlord navigator who would build relationships with landlords in order to create a centralized list of available, affordable rental units, to build trust with landlords in order to rent to tenants with a subsidy, and be a point of immediate contact for tenant questions or problems if case management is not available.



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

**Affordability** – Or rather, the lack of affordable housing causes a cascading effect on cost burdened residents and increases their risk of homelessness. Lack of affordable housing will result in longer wait times and limited availability for Public Housing units and Section 8 vouchers. Inevitably, this will force residents to find housing elsewhere, which typically includes living with friends or family. Depending on the size of the family and unit, this can result in overcrowding causing substandard living conditions.

**Housing Quality** – Affordable housing is typically affordable due to the conditions and state of the home. Conditions could include lack of utilities, insufficient maintenance, or not meeting current building codes. Older units tend to be relatively more affordable than newer units, but they can add costs in repair, maintenance and upgrades. Over 32% of East Orange’s residential building stock was built prior to 1940, and 82% was built prior to 1980. Less than 5% of East Orange housing units have been constructed since 2000.

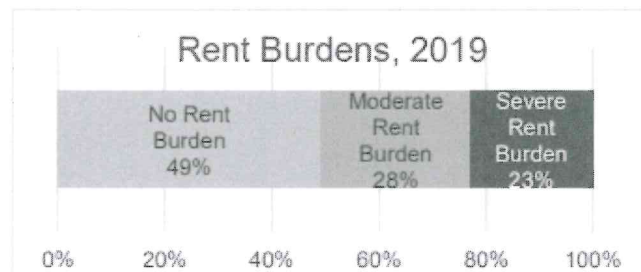
East Orange is what you can categorize as a renter community. Roughly 70%-80% of households rent their home. More than half of renters are burdened by housing costs, meaning they spend more than 1/3 of their income on rent. More than a quarter are severely rent burdened, meaning they spend more than half of their income on housing costs.

## Rent Burdens

Before the pandemic hit, rents were growing faster than incomes. **Incomes grew 6% since 2010, in real terms, compared to 9% increase in rents.**

Roughly half of all renters are rent burdened, meaning they spend more than they can afford on their housing.

	2019	Real Change since 2010
Median Renter Income	\$36,030	+6%
Median Gross Rent	\$1,114	+9%



The Federal standard is that people should spend no more than 1/3 of their income on rents:

- 51% of all East Orange renters were cost burdened
- 23% of all East Orange renters were severely cost burdened, meaning they spent more than half of their incomes for shelter.

Affordability by Size of Unit	All Units	0-1 Bedroom	2 Bedrooms	3+ Bedrooms
Rental Units Affordable at 30% HAMFI	17%	21%	11%	14%
Rental Units Affordable at 50% HAMFI	39%	55%	20%	22%
Rental Units Affordable at 80% HAMFI	84%	95%	79%	54%
Total Units	17,140	9,070	5,102	3,153

	Socioeconomic Indicators				Local Rental Affordability		
	Median Household Income	Median Renter Income	Renter Rate	Poverty Rate	LMAR	Local Median Gross Rent	Affordable Rent Gap
Orange	\$42,966	\$36,030	80%	21%	\$901	\$1,160	- \$259
East Orange	\$48,072	\$39,449	74%	18%	\$986	\$1,114	- \$128
Irvington	\$45,176	\$35,997	72%	19%	\$900	\$1,048	- \$148
Newark	\$35,199	\$29,784	78%	27%	\$745	\$1,085	- \$340

In East Orange, the gap between what people can afford to pay, and the going gross market rents, is smaller than the other municipalities. Still, the typical renter pays on average \$128 more than they can afford each month.

***Identify priority needs for qualifying populations:***

The priority needs among the qualifying populations are for shelter space for homeless populations, including shelter specifically for those fighting substance abuse and mental health, and for permanent supportive housing to move homeless households into permanent housing with the comprehensive services they need to ensure their housing stability.

Another priority is for permanent affordable housing serving those who are cost/servery cost burden, housing instability, and those with a range of disabilities including behavioral health and Intellectual and Developmental Disabilities (IDD), to improve their housing security and decrease their risk of becoming homeless.

**Homeless persons (Sheltered and Unsheltered)**

- Recovery and Transitional Housing
- Rehabbing Transitional Housing, Shelters, and Rapid Rehousing.
- Financial Services

- Job and Life Skills Training and Classes

**Persons at risk of homelessness (housed but at risk of homelessness)**

- Permanent housing with on-site Supportive Services for Youth exiting Foster Care
- Youth After School Programs and Services
- Tenant-Based Rental Assistance (TBRA)
- Intensive or Full-Time Care or Assisted Living for those with Severe Mental Illness or Issues due to Aging
- Affordable Housing

**Persons fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking, or human trafficking**

- Affordable Housing in Good School Districts
- Case Management and Peer-Support Services
- Childcare Service Vouchers
- Transitional and Recovery Housing
- Mental Health Programs
- Transportation
- Permanent housing with on-site Supportive Services

**Veterans and families that include a veteran family member that meets one of the preceding criteria**

- Behavioral Health Services
- Wrap around Support Services on site of provided Housing Services
- Basic Life Skills Trainings
- Emergency and Transitional shelters available for Veterans' Family Members
- PTSD Services

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

The starting point for The City was completing the Homeless Needs Inventory and Gap Analysis Table and the Housing Needs Inventory and Gap Analysis Table in the HOME-ARP Allocation Plan Template. The findings from completing these two tables warranted further data exploration. The most used data source to identify the gaps in housing and delivery of services was the HMIS/CHAS database – including data from the Coordinated Entry Program that is captured in the HMIS. Throughout the entire process, the City followed the data and continued to research further into the needs and characteristics of the qualifying populations and where gaps exist in the community.

## **HOME-ARP Activities**

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

Pending HUD approval of its HOME-ARP allocation plan and Annual Action Plan Substantial Amendment, the City of East Orange will issue a Notice of Funding Availability (NOFA) for interested homeless service agencies, affordable housing developers and experienced developers of permanent supportive housing and/or affordable housing. In addition, there will be a posted public notice in the local newspaper as well as on the City's website.

The City will ensure the application reflects all preferences and requirements as outlined in this Allocation Plan.

Grant(s) will be made based on the applicant's project scope as it pertains to the outlined QP needs in this plan and the applicant's familiarity with utilizing Federal funding and ability to comply with all Federal and Local requirements.

The City will not administer any eligible activities directly.

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

No portion of The City's HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan.

## **Use of HOME-ARP Funding**



	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 371,904		
Acquisition and Development of Non-Congregate Shelters	\$ 278,928		
Tenant Based Rental Assistance (TBRA)	\$ 371,904		
Development of Affordable Rental Housing	\$ 650,832		
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 0	0 %	5%
Administration and Planning	\$ 185,952	10 %	15%
<b>Total HOME ARP Allocation</b>	<b>\$ 1,859,520</b>		

*Additional narrative, if applicable:*

**SUPPORTIVE SERVICES**

Below is a list of activities that the City of East Orange will either expand on or start with the funds allocated for Supportive Services. During the stakeholder engagement the following services were prioritized as the most needed for the qualifying population now.

Case Management: The responsibilities include interacting with both individuals and families who have housing issues and connecting them with emergency shelters. The case manager must also assist homeless adults and at-risk youths in finding safe and affordable accommodations.

Education Services: One of the needs consistently mentioned by the stakeholders was a need for education or financial literacy. Funds can be rendered to service providers for education, but only when the distribution involves housing. There is a need to educate members of the qualifying population on how to budget, maintain their financial affairs and overall economic self-reliance. Most stakeholders feel that an investment in education can only have positive effects on housing stability in the City by increasing the percentage of the population transitioning into a better housing and financial position.

Moreover, the City will continue to support organizations that provide supportive services to help program participants achieve self-sufficiency, as many of the families and individuals who receive assistance to mitigate homelessness or to flee violent circumstances require all-encompassing supportive services. Through our feedback received from organizations that work closely with QPs, the need for more outreach services, along with housing navigation services and case management services, was noted to be most in need, as demand for these services has increased since the start of the pandemic. TBRA will also address these challenges by providing temporary rental assistance and/or security/utility deposits to expedite the transition from homelessness or to prevent it.

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

The proposed allocation is based on the priorities and recommendations that arose from the consultation sessions with stakeholders in the city. A top priority identified in this process was the significant need for the development of affordable rental housing.

## **HOME-ARP Production Housing Goals**

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

Based on the competitive RFP process allocating funding to specific projects after HUD approval of the HOME ARP Allocation Plan. The City of East Orange has a goal of 5 to 10 units of affordable rental housing.

Additionally, because the City will use an RFP/competitive process to award HOME-ARP funds, it is expected that proposed projects will leverage other funding sources such as Low-Income Housing Tax Credits (LIHTC), Housing Trust Fund and Federal Home Loan Bank grants, and other community or private philanthropic sources to increase the number of units produced.

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

Each of the eligible activities presents an opportunity to advance significant efforts in East Orange to address the significant challenges facing low-income and housing insecure households. There is a particular focus on prioritizing the increase of housing units that assist people both temporarily to stabilize their housing situation, but also with long-term affordability. Strengthening supportive services ensures that households receive additional assistance with barriers that have prevented them from remaining stably housed.

The primary goal will be to help address the lack of affordable housing in the City and to assist as many QP households as possible with supportive services. Through adding affordable units and increased funding to supportive services, East Orange aims for the HOME-ARP allocation to contribute to the overall goal of reducing homelessness and housing instability for the most vulnerable populations. Housing for single adult chronically homeless and at-risk households is a top priority need and the competitive NOFA/RFP process will recognize and elevate proposed projects that produce housing that meets this need.

## **Preferences**

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

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

The City of East Orange will not provide preferences to any population or subpopulation.

***If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:***

Not applicable

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

Not applicable

## **HOME-ARP Refinancing Guidelines**

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

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

Not applicable. East Orange does not intend to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing.

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

The City will enforce

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

Not applicable

- *Specify the required compliance period, whether it is the minimum 15 years or longer.*
- *State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.*

HOME-ARP funds will not be used to refinance ANY multifamily loans insured by other Federal programs, including CDBG.

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